



Intermountain Forest Association

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March 3, 2020

San Juan National Forest
Dolores Public Lands Office
Attention: Derek Padilla
29211 Highway 184
Dolores, CO 81323

SUBJECT: Salter Vegetation Management Project

Dear Mr. Padilla:

Intermountain Forest Association (IFA) is a member-based organization that advocates for healthy forests and healthy communities, including actively promoting sound forest management that provides a stable and sustainable supply of timber from public and private forestlands. Given that several of IFA's members heavily rely on timber output from the San Juan National Forest, we are excited about the proposed Salter Vegetation Management project on the Dolores District. On behalf of the members of the Intermountain Forest Association, I appreciate this opportunity to offer comments on the initial scoping.

Overall, we are very supportive of the San Juan National Forest being proactive in responding to the on-going beetle epidemic that is impacting pine stands within the project area. Not only does the project address the recent mortality, it also address the surrounding stands with the goal of making them more resilient and effective in fighting off future beetle attacks. We are also very supportive of your initiative to actively increase age class diversity and structural diversity within the project area. As our forests face increased pressures from climate change, it will be crucial to have forests that are more resilient. Given these conditions, we concur with the Purpose and Need as discussed on pages 2-3, as well as the Proposed Actions on pages 3-5. Below are some other comments we ask you to consider as you move forward:

- IFA members vary significantly in the businesses they run and the materials they can economically utilize. As the project is further developed, please keep in mind that forest product markets change rapidly and therefore it is imperative that flexibility be built into

the overall project design, including design criteria and specific silvicultural treatments. Some prescriptions, such as precommercial hand thinning, commercial thinning, and mastication may need to be accomplished through contracting methods such as stewardship. Ideally, the best quality material would be offered via traditional timber sales, whereas lower quality/ small diameter would be treated via stewardship.

- Most forest product businesses heavily rely on the ability to log the entire year, weather depending. We ask that you consider not limiting the NOS within the NEPA document, other than identified wildlife operating restrictions.
- Similar to limiting the operating season, hauling restrictions can really affect project implementation. We ask that hauling restrictions be kept to a minimum and that trucks be allowed to haul on weekends and Federal holidays where practical.
- Keep in mind that road maintenance (blading, drainage, and surfacing), the reopening of level 1 roads, and road decommissioning can be very expensive. Therefore, the volume per acre and/or unit must be high enough to be cost effective. Furthermore, temporary roads can be very expensive and should be minimized as possible.
- The construction and use of temporary roads is critical in allowing for economically feasible project implementation. We ask that you consider not limiting the construction of temporary roads to access planned timber sale units as was done on the Lone Pine EA.
- On good growing sites (higher site index), we recommend retaining closer to 80 square feet of basal area per acre across each stand. Reducing the basal area down to 50-70 across all stands will limit future growth production and could compromise the industry long-term.

We appreciate your consideration of these comments and suggestions as you move forward with the planning of the Salter Vegetation Management Project. I would be happy to discuss these comments if you have any questions.

Sincerely,

Molly Pitts

Molly Pitts
Intermountain Forest Association
Colorado Programs Manger