



Intermountain Forest Association

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USDA Forest Service
Arapaho and Roosevelt National Forest
Boulder Ranger District
2140 Yarmouth Avenue
Boulder, CO 80301

Subject: St. Vrain Forest Health Project

To Whom it May Concern:

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 Arapaho and Roosevelt (A/R) National Forests, we feel it is very important to be involved and provide comments on the proposed St. Vrain Forest Health Project.

Overall, IFA is very supportive of the A/R and their willingness to manage National Forest lands to reduce the risk of catastrophic wildfire and to foster forest resilience in a changing climate. We appreciate the A/R taking a landscape-level approach to planning and are excited about the idea of conditions-based management. This type of planning and management is critical given the forest health crisis facing many of our National Forests.

On behalf of the members of the Intermountain Forest Association, I appreciate this opportunity to offer comments on the Project itself, as well as the Purpose and Need and Proposed Action:

General Comments

In the Executive Summary, it states that the Project proposed action was developed over the course of many years and involved scientists, area residents, **partners** and community leaders. Yet, the first time industry was made aware of this project was late in 2021. It is unfortunate that industry was not considered to be a "partner" during the development of

this project. Since the release of the Proposed Action, I have taken steps with the local collaborative to get involved and stay informed.

Purpose and Need

Given the multiple-use mandate of the USFS and the fact that the project area does include suited timberlands, we are concerned that maintaining infrastructure and providing material to local businesses was not listed as a purpose and need of the project. We request that both be added under the “Promote resilient social and economic conditions.”

Furthermore, under the Social and Economic Conditions discussion (Pages 18 and 19), it would be helpful to include language that explains why having local harvesting capacity and a sustainable wood products industry will help reduce the overall cost of treatment and allow more acres to be treated long-term.

Proposed Action

As stated above, we recommend adding in language that includes maintaining local capacity and infrastructure to the Social and Economic Conditions Management Action Focus. None of the community values and desired future conditions can be achieved without companies to implement the projects on the ground.

Appendix B: Management Cards

Many of the vegetation management cards indicate that work will be performed typically from June 1st-November 15th. The ability to conduct logging operations during the winter is essential and can be helpful in mitigating other resource concerns. We encourage you to be more flexible in the timing of operations, unless necessary for wildlife.

Appendix C: Preliminary Design Features

Hydrology, Soils, Watersheds and Fisheries (HSWF)

- ***HSWF 2 – c)*** Given the technology of ground-based logging equipment, it is possible to mechanically remove encroaching conifers without operating within wetlands, fens, or wet meadows. We recommend revising the language to allow mechanical harvesting as long as the tracks/machine do not enter the restricted area.
- ***HSWF 6 – a & b)*** It is sometimes necessary to keep temporary roads open longer than a year after a project is completed to allow for reforestation and other fuels work. We recommend adding language that states, “unless necessary for follow-up activities (such as planting, burning piles, etc.).

Terrestrial and Aquatic Wildlife, Threatened, Endangered, and Sensitive Species (TES)

- ***Terrestrial Wildlife 6 – Timing Restrictions a)-d)*** In order to fully understand the operation periods allowed under this analysis, we recommend adding a table that shows all the overlapping wildlife restrictions.

We look forward to working with you as you move forward with the St. Vrain Forest Health Project.

Sincerely,

Molly Pitts

Molly Pitts
Intermountain Forest Association
Colorado Programs Manger