



Intermountain Forest Association

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

Subject: St. Vrain Forest Health Project

Submitted: via: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=61372>

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 are very supportive of the proposed St. Vrain Forest Health Project. On behalf of the members of the IFA, I appreciate the opportunity to continue to be involved in the process by offering additional comments on the Preliminary Environmental Analysis:

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. After reviewing the Preliminary EA for St. Vrain, we ask that you consider the following as you continue the process:

Need for the Proposal

Given the multiple-use mandate of the USFS and the fact that the project area does include suited timberlands and nearby forest utilization businesses, we were disappointed that maintaining infrastructure and providing material to local businesses was not listed as a

purpose under “Promote resilient social and economic conditions.” We request that maintaining a healthy timber industry be included within this purpose.

Social and Economic Conditions

Although jobs are listed as part of a resilient landscape, the corresponding text does not mention wood industry jobs. With the number of existing wood products businesses that rely on wood from the A/R, we feel additional language needs to be included that highlight the importance of keeping those business viable and the role they play in helping achieve the other purposes.

Proposed Action

Alternatives Considered but Dismissed from Detailed Study

Lodgepole Pine Forests and Spruce-fir Forests

We are concerned that this project does not plan on treating much in the lodgepole pine and spruce-fir forests and feel it is a huge, missed opportunity. We are also very concerned that management in these two ecosystems will be directed primarily towards resource protection and fire will be the main disturbance driver. We strongly disagree with this direction and request that language be added that recognizes timber as a valued resource. Additionally, the current POD boundaries within these landscapes are very large and should be broken into smaller units to further protect the timber resource. These ecosystems are very important not only for the timber industry but also for wildlife and should be managed accordingly.

Management Action Opportunity Areas

Given the current conditions of ponderosa pine and mixed conifer stands described on page 24, we are very concerned with only using prescribed broadcast burning as the only treatment. Map 2 shows that a lot of the areas identified for Rx fire only are within management area 1.41 (core area habitat), 3.5 (forest flora and fauna habitat), and 4.3 (dispersed recreation). Furthermore, Map 6 shows that most of the areas are moderately departed from their historic condition class. Combined, we don't feel Rx fire is the best first entry. We request these areas be considered for mechanical treatment first, especially if current conditions will not allow for objectives to be met and if merchantable material can be removed and utilized by local businesses (please see conclusion on page 46 of the EA).

Focus: Social and Economic Conditions

The Forest Service is a multi-use agency and jobs in rural communities is very important. We are concerned that the Preliminary EA does not acknowledge the importance of local jobs within the timber industry. The Proposed Action is critical to maintaining local jobs and infrastructure.

Appendix A: Condition Based Management Guide and Management Cards

Patchcut/Clearcut Management Card

We strongly disagree with requiring a specific logging system in project NEPA and request this be removed. By requiring a specific logging system, you are severely limiting flexibility during implementation, as well as the number of businesses that could potentially bid on

projects. Cut-to-length systems can achieve the same desired conditions when coupled with the right prescriptions and contract requirements.

Appendix B: Design Features

Fire and Fuels

- ***Fuels 7***- We strongly disagree with this design criteria and request that it be removed. Please see discussion above on Patchcut/Clearcut Management Card.

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

- ***General*** - In order to fully understand the operation periods allowed under this analysis, we recommend adding a table that shows all the overlapping wildlife restrictions.

Visual Resources/Scenery Management

- ***Visual/Scenery 1*** – we disagree with the requirement to cut stumps flush and request it be removed. This is very hard to achieve, expensive, and depending on conditions, dangerous.
- ***Visual/Scenery 1*** – we strongly disagree with the level of specificity on stumps, slash, and landings for higher scenic integrity levels. These requirements will be difficult to implement and expensive. We request this design feature be removed and dealt with during the implementation phase.

We appreciate your consideration of these comments and suggestions as you move forward with the planning of the St. Vrain 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