



Intermountain Forest Association

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USDA Forest Service
White River National Forest
Adam Bianchi, District Ranger
c/o Kathleen Gray
PO Box 620
Silverthorne, CO 80498

Subject: Swan Mountain Project

Submitted: via: <https://www.fs.usda.gov/project/?project=60771>

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 White River National Forest, we are very supportive of the proposed Swan Mountain Project on the Dillion Ranger District. 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 Swan Mountain Draft Environmental Assessment:

Overall, IFA is very supportive of the White River and their willingness to manage National Forest lands to reduce the risk of catastrophic wildfire and to foster forest resilience in a changing climate. After reviewing the Draft EA for Swan Mountain, we ask that you consider the following as you continue the process:

Proposed Action

Transportation

This project has a lot of road work, including realignment, temporary roads, decommissioning and trail creation. These actions can be very expensive and may need additional funding outside of a traditional timber sale to be accomplished.

Appendix A: Swam Mountain Fuels Proposed Action

Given that almost all the units fall within 5.41 Elk/Deer Winter Range, it will be important that any contracts for implementation be long enough in length to be achievable given the timing restrictions. Also, several of the mechanized units are very small and may be less economical to implement.

Appendix B: Design Features

Recreation

- **#5-** If the FS is unable to close a trail and a flagger must be utilized, we request this be at the expense of the Forest Service.

Fuels

- **#3** -The requirement to lop and scatter slash within 18 inches of the ground in mechanized units is not practical. We request this design criteria be changed to specify the difference between hand units and mechanized units, with mechanized units requiring 3 feet, rather than 18 inches.

Wildlife

- **#7** - This design criteria is overly broad and we request it be changed to allow for nighttime hauling. Nighttime hauling is critical during certain times of the year to minimize road damage and use conflicts.

Botany

- **#2** - The requirement to have a qualified, independent third-party contractor (ITPC) onsite during all activities that might impact a Threatened, Endangered, Proposed or Candidate (TEPC) plant species could be very expensive. We request this design criteria be at the expense of the Forest Service.

Transportation

- **#9** - Dust abatement is very expensive. Please make note that this expense will be part of the appraisal process.

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

Sincerely,

Molly Pitts

Molly Pitts
Intermountain Forest Association
Colorado Programs Manager