



# Intermountain Forest Association

886 S Charlo Drive Pueblo West, CO 81007

928-521-9476

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White River National Forest  
Dillion Ranger District  
Adam Bianchi, District Ranger  
c/o Kathleen Gray  
PO Box 620  
Silverthorne, CO 80498-0620

SUBMITTED VIA ONLINE:

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=63395>

SUBJECT: Town of Frisco Backyard Fuels and Recreation Project

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 excited about the proposed Town of Frisco Backyard Fuels and Recreation Project on the Dillion Ranger 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 Town of Frisco Project and your initiative to actively manage lands to prevent and reduce the risk of high intensity wildfires within the wildland-urban interface. As our forests face increase pressures from climate change, it will be crucial to reduce overall density and fuel loadings to make our forests more resilient. Given these conditions, we concur with the Purpose and Need and the Proposed Action as stated on pages 3-4.

## **Detailed Comments – Proposed Actions**

- 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 hand treatments and helicopter logging 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.

- Some of the project units are very small in size and may be difficult to implement cost effectively. Mobilization of equipment to different units can be very expensive.
- 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.
- As the project develops, we ask that you carefully consider each design criteria that is recommended and determine whether it is actually needed or whether concerns can be met through implementation contracts. Furthermore, if included, we ask that the forthcoming analysis explicitly discuss the economic costs for implementing the various design criteria. It is possible to have design criteria that are so stringent that the project becomes economically infeasible.

We appreciate your consideration of these comments and suggestions as you move forward with the planning of the Town of Frisco 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