



Intermountain Forest Association

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Submitted: via: <https://cara.fs2.usda.gov/Public/CommentInput?Project=62825>

Re: Comments to the Junction-Falls Creek Integrated Resource Management (J-FIRM) Project

Introduction

Intermountain Forest Association (hereinafter “IFA”) hereby submit these comments pursuant to the United States Department of Agriculture/ United States Forest Service’s (hereinafter “USFS”) comment procedures under 36 C.F.R. Part 218.25. CTIA appreciates the opportunity to comment on the proposed actions described in the Draft Environmental Assessment, and Draft Finding of No Significant Impact for the *Junction-Falls Creek Integrated Resource Management (J-FIRM) Project* (February 2024).

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. IFA’s members engage in many aspects of forest management and are an important stakeholder partner to the USFS. IFA’s members presently (and plan in the future) to engage in timber removal in some capacity from the J-FIRM Project area.

Overall, IFA is supportive of the USFS and their willingness to manage National Forest lands to reduce the risk of catastrophic wildfire and to foster forest resilience in a changing climate, and we submit the below comments for consideration.

Junction Creek Road/Logchutes Uplands Geographic Area

Vegetation Thinning:

IFA appreciates that USFS note at 12 that trees of any size class could be removed in order to meet a basal area range of 50-70 sq ft/acre. However, the statement “except for ponderosa meeting multiple pre-

settlement characteristics” is too ambiguous which could lead to varying interpretations. IFA recommends that USFS define the term “multiple” as there are seven potential characteristics that may be present which could lead to classification as “pre-settlement.”

Commercial Thinning:

IFA recommends that when making species and tree condition selections for treatments that industry interest and capacity is considered especially in light of USFS’ budget constraints related to stewardship contracts.

Conclusion

IFA believes that the above recommendations will provide clarity and ensure a successful project outcome. We appreciate your consideration of these comments and suggestions as you move forward with the planning of the J-FIRM Project.

Sincerely,

Megan Maxwell

Megan Maxwell
Colorado Programs Manager
Intermountain Forest Association