



Intermountain Forest Association

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Submitted: via: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=64845>

Re: Scoping Comments on the Proposed Big Meadows Fuel Break Project Categorical Exclusion

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. 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 Sulphur Ranger District.

IFA appreciates the opportunity to provide comments as part of the scoping process for the Proposed Big Meadows Fuel Break Project Categorical Exclusion. 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. However, we believe the United States Forest Service (USFS) is inhibiting its flexibility to manage and treat the forest in a few keyways, detailed below.

Vegetation Treatments

IFA appreciates that USFS intends to implement the project through a combination of timber sales and stewardships. However, considering market conditions and the timber being offered, we urge USFS to have a contingency plan for the possibility of the sales going no bid. One way to avoid no bid is to include material that the local industry can utilize commercially.

IFA contends that USFS is limiting themselves by restricting the removal of "large," healthy trees ("thinning activities would retain the largest, healthiest, and most fire-resistant

trees”), and submits that in some instances the removal of this category of tree would meet the desired conditions and meet the purpose and need, while providing local industry partners with merchantable timber. Further, the CE does not discuss the potential to generate *forest products* (emphasis added) from the removal of material by any mechanical or manual treatments. Instead USFS, when discussing the types of potential treatments, omits any possibility of the harvested material having any potential as forest product. IFA recommends that for vegetation treatments in the project area USFS allow for the removal of product when available and that USFS confer with industry in the area. Further, by allowing more opportunities to remove merchantable material, USFS would benefit from cost reduction and help sustain milling infrastructure in the project area.

Additionally, in the CE USFS refers to tree diameter as “smaller” and “larger.” This is extremely ambiguous and could cause confusion at the implementation stage. IFA recommends that USFS defer tree size to the timber sale preparation phase, recognizing that on-the-ground conditions may warrant “large” trees to be removed in order to achieve the desired conditions and the purpose and need. Alternatively, USFS should define “small” and “large.”

Appendix A

Hydrology, Soils, Watersheds and Aquatics: Integrated Design Criteria 15-19

- **Riparian Zones, Stream Channels and Wetlands: Buffers and Other Design Features**

We suggest that USFS provide flexibility in design features as it relates to hydrology, soils, watersheds, and aquatics in light of current technology of ground-based logging equipment, making it possible to mechanically remove encroaching conifers without operating within wetlands, fens, or wet meadows. We recommend that mechanical harvesting be an option as long as tracks/machinery do not enter the restricted area.

IFA supports 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. However, IFA believes the Big Meadows Fuels Break Project can be improved based on our suggestions herein and encourage the USFS to provide for increased flexibility as it relates to the management of the timber industry.

Respectfully Submitted,

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