



Intermountain Forest Association

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Submitted: via: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65795>

Re: Scoping Comments on the Proposed Southwest Blanco Wildlife Habitat Enhancement Project

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 Blanco Ranger District.

IFA appreciates the opportunity to provide comments as part of the scoping process for this project. We believe the United States Forest Service (USFS) is inhibiting its flexibility to manage and treat the forest in a few keyways, detailed below.

Proposed Action

In light of the purpose and need¹ and the number of seral and conifer replaced stands in the proposed project area, USFS should explain why conifer treatments are not described in the proposed action. IFA contends that this is a missed opportunity by the USFS to treat aspen/mountain shrub communities and supply local industry with commercially viable timber. IFA recommends that for the 11,775 acres (*see* Table 3) classified as seral or non-aspen forest be prioritized for removal of commercially viable timber.

¹ "The purpose of the proposed action is to improve wildlife habitat by creating a mosaic of vegetation conditions and manage fuel loading within mountain shrub and aspen vegetation communities."

Project Parameters

Riparian Zones, Stream Channels and Wetlands:

We suggest that USFS provide flexibility in design features/project parameters as it relates to riparian zones and wetlands considering the current technology of ground-based harvesting equipment, making it possible to mechanically remove encroaching conifers without operating within wetlands and other riparian areas. We recommend that mechanical harvesting be an option as long as tracks/machinery do not enter the restricted area.

Steep Slopes:

Limiting mechanical treatments to slopes less than 30% is unnecessarily restrictive considering the advances in technology for steep slope harvesting. IFA recommends that this prescription be removed and instead replace it with “mechanical treatments, such as tethered or other high flotation harvesting equipment may be used on slopes greater than 40%.”

Vegetation Management Activities

The proposed project 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. Specifically, when discussing treatments in aspen, USFS states “[c]oppice cuts would use conventional ground-based machinery to *harvest and reduce them to slash and woody litter*” (emphasis added). 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 during subsequent planning activities.

IFA appreciates the opportunity to provide this early feedback and is eager to work with USFS on how to best utilize the local industry while achieving their desired condition for the project. Allowing for product removal and enhancing wildlife habitat are not mutually exclusive. We look forward to continued conversations.

Respectfully Submitted,

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