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First name: Molly

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Organization: Intermountain Forest Association

Title: Colorado Programs Manager

Comments:

April 7, 2023

USDA Forest Service, Rio Grande National Forest

Attn: Dan Dallas, Reviewing Officer

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1055 9 Street

Del Norte, Colorado 81132

Subject: Cantonment Vegetation Management Project Objection

Dear Mr. Dallas:

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 Rio Grande National Forest, we are very supportive of the Cantonment Vegetation Management Project on the Saguache District. Recognizing the importance of being involved with the process, IFA submitted comments during scoping. Therefore, having standing as outlined in 36 CFR Part 218.8, we submit the following objections to the Environmental Assessment and Finding of No Significant Impact (FONSI) and the Draft Decision Notice

Overall, IFA is very supportive of the Rio Grande National Forest and their willingness to actively manage National Forest lands to maintain and improve ecosystem function, resilience, and sustainability, while also supporting the local timber industry by providing wood products.

Environmental Assessment

Proposal Development

We were disappointed to see that the Proposed Action was modified, and overall treatment acres were decreased, especially with regards to sanitation and salvage. If these stands are not healthy, this analysis and subsequent projects are the best option for providing treatment to increase forest health.

Environmental Impacts

To be better understand the implementation opportunities, we request a table be added that shows each unit and the corresponding timing restrictions.

Project Design Features

We disagree with the requirement to lop activity slash within green harvest units to a height of two feet or less. This is very expensive and could reduce financial feasibility. We request this design feature be changed to three feet or less.

We forward to working with you to resolve the issues discussed above as you move forward with the Cantonment Vegetation Management Project.

Sincerely,

Molly Pitts

Molly Pitts
Intermountain Forest Association
Colorado Programs Manger