



Intermountain Forest Association

886 S. Charlo Drive Pueblo West, CO 81007
928-521-9476

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USDA Forest Service
Arapaho and Roosevelt National Forest
Canyon Lakes Ranger District
2150 Centre Avenue, Building E
Fort Collins, CO 80526

Subject: Black Diamond Landscape Resiliency and Risk Reduction Project

Submitted: via <https://cara.fs2c.usda.gov/Public//CommentInput?Project=62591>

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. Given that several of IFA's members heavily rely on timber output from the Arapaho and Roosevelt (A/R) National Forests, we are very supportive of the proposed Black Diamond Landscape Resiliency and Risk Reduction Project. On behalf of the members of the IFA, I appreciate the opportunity to continue to be involved in the process by offering additional comments on the Preliminary Environmental Analysis:

Overall, IFA is very supportive of the A/R and their willingness to manage National Forest lands to reduce the risk of catastrophic wildfire and to foster forest resilience in a changing climate. We appreciate the A/R taking a landscape-level approach to planning and are excited about the idea of conditions-based management. This type of planning and management is critical given the forest health crisis facing many of our National Forests. After reviewing the Preliminary EA for Black Diamond, we ask that you consider the following as you continue the process:

Need for the Proposal

Given the multiple-use mandate of the USFS and the fact that the project area does include suited timberlands and nearby forest utilization businesses, we were disappointed that

maintaining infrastructure and providing material to local businesses was not listed as a purpose under “Improve/create/facilitate fire adapted communities.” We request that maintaining a healthy timber industry be included as a new Purpose, titled “Maintain and grow local implementation capacity and infrastructure.”

Proposed Action

Management Action Alternatives Framework (Page 15)

Since maintaining local industry was not listed as a Purpose, there is no consideration to providing wood products under the Framework. We request a new Outcome titled “Economic Considerations” be added that includes language considering local businesses and the need to provide wood products to maintain local capacity and infrastructure. None of the community values and desired future conditions can be achieved without companies to implement the projects on the ground.

Management Action Opportunity Areas (Page 16)

We are very concerned about the opportunity to only use prescribed fire instead of mechanical treatment as the first treatment in areas that may have quality wood products. Currently, approximately 54,710 acres fall into this category. Once again, we request language be included that provides serious consideration to the local businesses and the need for raw materials.

Lodgepole Pine Forests and Spruce-fir Forests (Page 30)

We are concerned that this project does not plan on treating much in the lodgepole pine and spruce-fir forests and feel it is a huge, missed opportunity. We are also very concerned that management in these two ecosystems will be directed primarily towards resource protection and fire will be the main disturbance driver. We strongly disagree with this direction and request that language be added that recognizes timber as a valued resource. Additionally, the current POD boundaries within these landscapes are very large and should be broken into smaller units to further protect the timber resource. These ecosystems are very important not only for the timber industry but also for wildlife and should be managed accordingly.

Stand Improvement (Pages 31 and 32)

Standard VEG S5 of the Southern Rockies Lynx Amendment allows for precommercial thinning both within and outside of WUI. We strongly encourage this project to maximize the total amount of precommercial thinning to the percent allowed.

Climate Change (Page 32)

We are disappointed that the climate change discussion does not acknowledge the role of wood products play in storing carbon and helping to mitigate climate change. We request information be added to this discussion that highlights this important information.

Socioeconomics (Page 66)

The Forest Service is a multi-use agency and jobs in rural communities is very important. We are concerned that the Preliminary EA does not acknowledge the importance of local

jobs within the timber industry. The Proposed Action is critical to maintaining local jobs and infrastructure.

Soils (Page 70)

We strongly disagree with the statement that states, “no adverse impacts to soils would occur if the proposed action were not implemented.” One of the biggest risks to soils is catastrophic wildfire and this should be discussed.

Appendix A: Management Cards

Whole Tree Yarding – Activity Card 09

We strongly disagree with requiring a specific logging system in project NEPA and request this be removed. By requiring a specific logging system, you are severely limiting flexibility during implementation, as well as the number of businesses that could potentially bid on projects. Cut-to-length systems can achieve the same desired conditions when coupled with the right prescriptions and contract requirements.

Lop and Scatter – Activity Card 10

We strongly disagree with the requirement that lop and scatter depth be less than 18 inches. This is very difficult and expensive to implement. We request this management activity card be changed to at least 24 inches.

Appendix B: Design Features

Fire and Fuels

- **Fuels 7-** We strongly disagree with this design criteria and request that it be removed. Please see discussion above on Activity Card 09.

Hydrology, Soils, Watersheds and Fisheries (HSWF)

- **HSWF 5** – It is sometimes necessary to keep temporary roads open longer than a year after a project is completed to allow for reforestation and other fuels work. We recommend adding language that states, “unless necessary for follow-up activities (such as planting, burning piles, etc.).”

Terrestrial Wildlife (Including Threatened, Endangered, and Sensitive Species (TES)

- **General** - In order to fully understand the operation periods allowed under this analysis, we recommend adding a table that shows all the overlapping wildlife restrictions.
- **Wildlife 10** – We disagree with the ¼ mile no-treatment buffer as proposed, especially without citation for justification. We request this restriction be removed.
- **Wildlife 13 (c)** – We strongly disagree with the proposed acceptable mortality in areas that have not received prior fuels treatments. We request these mortality percentages be dropped significantly. This is especially important in areas that have quality wood.
- **Wildlife 16 (b)** – We disagree with the one-mile radius buffer season activity restriction, especially without citation. We request this restriction be removed.

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