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Organization: Intermountain Forest Association
Title: Executive Director
Comments: Intermountain Forest Association

June 30, 2023

Subject: Black Diamond Landscape Resiliency and Risk Reduction Project Objection

Dear Mr. Williams:

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 National Forest, we are supportive of the Black Diamond Landscape Resiliency and Risk Reduction Project on the Canyon Lakes Ranger District. Recognizing the importance of being involved with the process, IFA submitted comments during scoping and in response to the draft Environmental Analysis. Therefore, having standing as outlined in 36 CFR Part 218.8, we submit the following objections to the Final Environmental Assessment and the Draft Decision Notice.

Overall, IFA is supportive of the Arapaho and Roosevelt National Forest and their willingness to manage National Forest lands to improve/maintain forest/landscape health and resilience, support local communities in their efforts to be more fire-adaptive, and improve wildfire response.

Proposed Action

Management Action Alternatives Framework

We object to the fact that the Management Action Alternatives Framework does not include any consideration for providing wood products through treatment. For example, does the treatment include merchantable wood that will be harvested? We request this language be included.

Lodgepole Pine Forests and Spruce-fir Forests

We strongly object that the management within Lodgepole Pine, and Spruce-fir forests will be directed primarily towards resource protection and fire will be the main disturbance driver. This is especially valid when considering design features such as "Wildlife 13", which would only serve to promote hazardous fuels accumulations on the landscape. Allowing an average mortality amount of up to 75 percent in untreated stands only serves to exacerbate hazardous fuels accumulations, move the forests further from historic/natural conditions, and does not allow the ARNF to meet the purpose and need of the project including purposes 1 through 4.

Untreated lodgepole pine and spruce/fir stands can often exceed 60 (or more) tons per acre of woody biomass - which is predominantly accounted for in the boles of the trees. 75 percent mortality in such a stand would result in extreme fuel loads as those killed trees fall to the forest floor. USFS GTR-105 describes natural/historic coarse woody debris loads in ponderosa pine, and lodgepole pine, ranged from 4.8-11.3 and 12.2-25.9, respectively. GTR-105 also discusses that where fires had continued to burn closer to historic return intervals the fuel loading was and would be much less than stated previously. If the intent is to restore fire adapted ecosystems (purpose 1), heavy fuel loads post prescribed fire will not meet that. If the intent is to promote resilient watersheds (purpose 2), heavy fuel loads will not accomplish that. The same can be said for reducing the likelihood of complete loss (purpose 3) in "old growth" stands (certainly 75 percent comes close and the fuel loads would only ensure future mortality when burned) and for reducing hazardous fuels (purpose 4). Killing the trees and leaving them to fall to the forest floor only reorients the fuels, increasing availability, and does not remove the fuel from the landscape or from a hazardous situation. Without additional restoration and creation of stand diversity through mechanical means, the ARNF will be unable to meet numerous needs outlined in the EA. We believe that timber should be considered a valued resource and management actions should include opportunities for mechanical treatment. We request this language be changed and management options for these landscapes be broader than just prescribed fire.

Additionally, we object to the size of the current POD boundaries within these landscapes. Currently, POD boundaries within these landscapes are very large and we request they 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.

Appendix B: Design Features

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

* Wildlife 10 - We object to the 1/8-mile buffer as proposed around "potential" future gray wolf den sites. This design criteria has not been justified with a citation and request it be removed.

* Wildlife 13 (d) - We strongly object with the proposed acceptable mortality resulting from prescribed burning operations. We have discussed our concerns previously in this objection and request a mortality level no greater than 10 percent for all trees over 5" DBH. Additionally, we request the pod boundaries be broken into smaller units to further reduce the likelihood of high severity fire effects.

* Wildlife 16 (b) - We object to the one-mile radius buffer season activity restriction, especially without citation. We request this restriction be removed.

We look forward to working with you to resolve the issues discussed above as you move forward with the Black Diamond Landscape Resiliency and Risk Reduction Project.

Sincerely,

Ben Wudtke

Executive Director