



Intermountain Forest Association

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Kevin Khung, Pagosa District Ranger
San Juan National Forest
PO Box 310
Pagosa Springs, CO 81147

SUBMITTED VIA ONLINE: <https://cara.ecosystem-management.org/Public//CommentInput?Project=57071>

SUBJECT: Upper Rito Buckles Vegetation, Fisheries, Watershed and Travel Management Project

Dear Mr. Khung:

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 San Juan National Forest, we are very supportive of the Upper Rito Buckles Vegetation, Fisheries, Watershed and Travel Management Project on the Pagosa Ranger District. On behalf of the members of the Intermountain Forest Association, I appreciate this opportunity to offer comments on the Draft Environmental Assessment.

Overall, we are very supportive of the San Juan National Forest being proactive in recovering timber value from dead and dying trees while also reducing the potential for impacts from other insects and disease and promoting a more balanced forest structure. After reviewing the Draft EA, we concur with the Purpose and Need for Action as stated on pages 3 and 4.

Detailed Comments – Alternative 2 - Proposed Action

- We disagree with the concept of retaining/deferring a minimum of 25% within the project area as “biological legacies” without further information and written

clarification. We especially do not feel deferral is appropriate in Management Area 5, unless the deferral acres are on steep slopes, inaccessible with traditional harvesting equipment, and/or hydrologically sensitive areas. The project area contains 11,097 acres and as written, the proposed action is only for 2,565 acres. This equates to only treating 23% of the landscape within the analysis area. Therefore, there is absolutely no need for further deferral unless for the reasons stated above. Additionally, we disagree with leaving more standing dead trees than what is required under the Forest Plan.

- IFA members vary significantly in the businesses they run and the materials they can economically utilize. Some treatments may need to be accomplished through contracting methods such as stewardship. Ideally, the best quality material would be offered via traditional timber sales, whereas lower quality/ small diameter would be treated via stewardship. This is especially true for non-vegetation work such as fish habitat improvement projects, road and trail decommissioning, and trail building.

Detailed Comments – Design Elements

Watershed and Soils

- We disagree with restricting mechanical harvesting operations to slopes of 35% or less and recommend you change this restriction to slopes of 40% or greater. Not only can modern harvesting equipment handle slopes up to 40%, but the current Forest Plan does not limit mechanical harvesting to slopes less than 35%, and the draft EA does not justify the restriction. Furthermore, rather than this restriction, other types of mitigation measures such as requiring dry/ frozen ground or specific machines could be utilized to minimize disturbance.

Measures for Reclamation

- We disagree with the requirement to decompact temporary road surfaces to a minimum of 6 inches. New research through the Spruce Beetle and Aspen Decline Management Response (SBEADMR) has showed that ripping to a 4-8" depth is sufficient and areas with greater than 40% surface rock (fragments >3") should not be ripped at all. If ripped too deep, the subsoil (B horizon) is mixed with the surface soil (A horizon) which reduces overall soil productivity. The 40% surface rock provision is necessary because areas with high rock content typically do not compact, so ripping is not necessary and can cause large rocks to be pulled the surface crating an undesirable "boulder field" effect.

Recreation

- Please clarify if "limit logging activities during the opening weekends (Friday-Sunday) of the first, second, and third big game hunting seasons" includes hauling.

Detailed Comments – Affected Environment and Environmental Consequences

Wildlife and Fish – Federally List Species

- Given the effects determination of “may affect, is likely to adversely affect” for Canada Lynx, it would be helpful to understand the overall size of the Lynx Analysis Unit(s) (LAU) and the number of acres available for treatment under the current cap as outlined in the Southern Rockies Lynx Amendment. Please include this information within the analysis. That being said, we fully support treatment within LAUs and recognize the caps were put in place to allow some treatment to occur, while still protecting the lynx.

We appreciate your consideration of these comments and suggestions as you move forward with the Upper Rito Buckles Vegetation, Fisheries, Watershed and Travel Management 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