



1309 East Third Avenue  
PO Box 2461  
Durango, CO 81302  
970.259.3583  
sanjuancitizens.org

March 12, 2021

Dolores Ranger District  
San Juan National Forest  
Attention: Derek Padilla  
29211 Highway 184  
Dolores, CO 81323

RE: SJCA Comments on Draft Environmental Assessment for the Salter Vegetation Management Project - 57671

Dolores District Staff,

Thank you for considering our comments on the Salter Project.

We have framed many of our comments utilizing the so-called “three-legged stool” that USFS staff often refer to as a basis for their management planning and project implementation - the combined social, economic and ecologic context of a project, or SEE. We agree that addressing all of the SEE issues should be a priority for the Salter project, yet as we have discovered through a review of the Draft EA and associated documents the project does not meet muster in this regard. Unfortunately, our review of the EA also reveals that it misses addressing critical and relevant issues and is deficient in sharing with the public all of the necessary background and foundational information needed for this type of decision document. Our comments will address these informational shortcomings as well as recommend a way forward towards a balanced and scientifically-based decision for the 22,000+ acre Salter Project landscape.

### **Lack of Data and Related Analysis**

#### **Forest/Vegetation Conditions**

While the current forest/vegetation conditions of the Salter project area are described in narrative form in the EA, it is described in a general manner and we can find nothing in the EA or associated documents that provides specificity regarding the current conditions. Common stand exam, other types of survey results, and/or other data that provides more detail that a narrative description is necessary for this type of EA both to comply with NEPA standards and to support the public in providing informed comments. In very basic terms, if the starting (current) point is not known than the ability to comment on how best (project treatment design) to reach the desired conditions is not possible.

### Economic Information

The EA also lacks the necessary information regarding a wide variety of economic metrics that are necessary to make informed comments on the EA. The EA provides, once again, a narrative description of the wood products industry that provide some insight into this component of the overall economic picture of the project, however, we find no information related to what the project might entail regarding the number of possible employment opportunities, the estimated dollar amount of contracts, the possible economic impacts (positive and negative) to local/regional towns and counties as related to the project, etc. Most troubling is the entirely missing component of non-wood products industry related information, either in narrative or numeric form. The general impression shed by this NEPA document is that the wood products industry “stands alone” and that the project as envisioned is a “siloed” entity per its interactions with other uses of the forest lands including hunting, biking, hiking, camping, firewood collection, access to boating, etc.

No attempt has been made to quantify the economic value of existing uses of the national forest in the Salter area. Determinations of this information is entirely possible, in fact, the Region 9 Economic Development District is specifically organized to provide this type of information to the community as need for planning purposes, the exact need of this EA. Even amongst the scores of comment letters the public has submitted on this project there are private citizens who are attempting to place dollar values on the diverse recreation economy that now exists in the region, an economy that exists thanks to the visionary planning and determined hard work of elected officials, business entities and hundreds of volunteers from Montezuma County. It is difficult not to assess that the agency has their “head in the sand” when it comes to recognizing the strong recreational economy in the Dolores area based on both residents and visitors with a huge emphasis being on the Boggy Draw trail system.

We find the determination of a Finding of No Significant Impact (FONSI) to be invalid being the EA provides insufficient information on which to make that finding. We believe that it would have been possible to move forward with a project of this scope and complexity as an EA rather than an Environmental Impact Statement (EIS) should a diversity of economic information and related analysis have been provided, and therefore (and with using that metric) now recommend that an EIS is necessary as that is the only avenue to fold in the necessary economic data and analysis for a determination of project design that address the full spread of economic activity and interests in the Salter Project landscape and adjacent affected federal and private lands. The Dolores District had every opportunity to assess numerous conditions and metrics related to this NEPA process and failed to carry forth their responsibility to do so.

### **Purpose and Need Statement (PNS)**

We are exceptionally disappointed that the PNS has not significantly evolved since the scoping document and remains too narrow in its scope. In our scoping comments (3.22.2020 – attached as an appendix) we provided specific suggestions for broadening the scope of the PNS to better reflect a more diverse set of goals that can and should be guidance for the proposed project. We’re unsure as to why there is apparent resistance within the agency to a more comprehensive PNS that would more accurately reflect a project that needs to better reflect the social, economic and ecologic aspects of what should

necessarily be goals of the project. There is no specific reference to climate, none per restoration, nothing per WUI, and none that recognizes the substantial nature of this multiple use area and its economic standing in the county. The unfortunate takeaway from this narrow PNS is that the project is intended only to be a timber harvest proposal with no apparent reverence shown to the wider community and their interests.

It can and should be much more than that, but without a clear PNS statement to guide the project in light of a much wider set of purposes and needs, it is not.

While we heard District Ranger Padilla specifically comment at the virtual public meeting on March 10, 2021 that the PNS is not open to comment during the Draft EA comment period we are specifically “pushing on” the inadequacy and narrowness of the PNS due to the reality that it is the central framing statement of the EA. By “sticking to” the initial PNS the Dolores District is unfortunately showing a myopic approach to both the wider potential benefits and inherent challenges of this project as framed in the SEE context. The agency must and can do better.

### **Response to Scoping Comments**

I have not fully assessed the alignment between what topics were brought forth during the scoping period by commenters, however, from matching only SJCA scoping comments and those of a couple other commenters it seems apparent that many issues brought forth were never even acknowledged in the EA as salient issues. And these issues were certainly not addressed as significant issues relative to the SEE context of the projects – local non-wood products industry economics, climate issues, restoration prescriptions, and others.

Unfortunately, my takeaway is increasingly being one that scoping comments are only a “check-off” within the NEPA process rather input for the agency to incorporate into the process. During the Lone Pine NEPA process there was a significant dismissal of scoping input and though we do not have all of the details in hand per the Salter process and the range of issues brought forth in scoping comments, a “repeat” of the Lone Pine process per the dismissal of scoping seems to be the reality.

### **NEPA Alternatives**

Unless we missed something in the EA, we find that it only includes one Alternative other than the legally required No Action Alternative. Although there is mention of an Alternative 3, it is not even listed and explained in “Section 2 - Proposed Action and Alternatives” therefore is delegitimized as an Alternative under consideration by the agency and certainly indicates the pre-decisional mindset of the Dolores District. It should be clear to the USFS staff that a legitimate Alternative needs to be fully described to serve as an Alternative that can be commented upon by the public, not to mention to serve as a possible alternative management choice to the Proposed Action. On page 32 of the EA it states: “This alternative is referred to as Alternative 3 – Large Tree Retention in the *Environmental Effects* section of this assessment. There are no other differences between Alternative 2 and Alternative 3.” Once again, legitimate Alternatives should all be listed in the relevant Section 2 of the EA, not randomly detailed in the Environmental Effects section.

### **Climate Issues**

The EA is almost entirely silent on how the project interfaces with a variety of aspects related to the changing climate despite specific the scoping comments of ours (and likely others. While the climate models, including those presented to the DWRF Collaborative by USFS researcher Jim Worrall, indicate a very severe decline in the extent of the ponderosa forest type in the next few decades there is no mention of this project reality in the EA. While the intended increase in resilience of the ponderosa forest seems to be an intended outcome of the Salter project, we find nothing in the project that indicates that attention is being given to the possible loss of the ponderosa forest including what adaptation measures might be considered in light of the climate models. From what we had read in the EA the approach seems rather to be to proceed with blinders on per the imminent (and now current) climate change impacts. The EA proceeds “merely forth” with the supposition that the ponderosa forests will seemingly be there in perpetuity with intended 20-25 year cutting cycles which according to the agency’s own science is not the likely future scenario.

### **Current Conditions**

In our scoping comments we specifically called out the need to provide detailed information about the current conditions within the project area, because as it quite obvious it’s impossible to examine and determine a project design to obtain the desired conditions when the starting point is not known. The EA does include significant sections of narrative outlining the current conditions of the project area, however, as helpful as the narrative is the data of, or derived from, the common stand exam data should be included in the EA directly, or within another document in the online public access project file. To be clear, public commenters should not be relegated to asking agency staff for specific data on which to base their comments.

Subsequent to the release of the EA a presentation (Salter\_Draft\_EA\_DWRF\_Presentation) was given to some stakeholders that included an array of information related to the current conditions. I’m fully baffled, and very disappointed that this information was not provided in the EA as it’s exactly the type of information that should be included. It seems evident that the information had already been gathered and synthesized by agency staff, so it’s disturbing it was not made available to the public directly in the EA when it was released. Anytime such basic and essential data is not made available to the public the inevitably question arises, why not? Because the information provided in the aforementioned presentation was not included in the EA it will not be addressed in these comments. The lack of such data within the released EA on February 10 indicates yet another reason why a re-issue of a draft EA is indicated or a switch to an EIS be made.

### **Actions to Meet Desired Conditions**

As we understand the project, a central aim is in general to increase the age and size diversity across the project landscape which is a fit with the desired conditions from the 2013 LRMP. Our understanding is that there are two particular size/age classes that are deficient representationally, seedlings/saplings and older/larger ponderosas. (though there is no stand data to quantify such). The younger cohort of trees will hopefully increase in their overall percentage of the stand as a result of numerous outcomes from project activities including a more supportive shading/sun mix, less competition from smaller ponderosas, soil disturbance providing bare ground and the backup (hopefully

unnecessary) of planting. That said, regeneration challenges will be significant due to the drying and warming climatic trend.

While the actions and support for increasing the number of young ponderosas seems to be readily agreed upon by a spectrum of stakeholders, the approach to promoting and protecting ponderosas on the other end of the spectrum, the older and larger trees, remains surprisingly controversial. The older/larger trees provide a range of benefit to the forest including being seed sources, being most resistant to fires, and sometimes able to provide specific benefits to wildlife. Because not only are the older/larger ponderosas particularly beneficial, they also exist in fewer numbers (“Large trees, 27 inches in diameter and larger, are poorly represented with only a few trees per acre.” EA at page 7.) there is a substantiated need to retain them across the landscape.

Unfortunately, the Salter Project design does not address the need to retain older/larger trees to meet the desired condition noted in the LRMP by providing a sufficiently stout methodology to retain all older/larger trees that are either not significantly diseased or beetle infested. Though the District evidently as a descending order protocol they may apply to the project (or some elements of the project) this information is not included in the EA – again, why not? While such a decision protocol could perhaps be a useful tool, it still provides inadequate protection to the thousands of the larger/older ponderosas that the EA states are “poorly represented” in the project area.

The lack of specific and unqualified (except for diseased and infested trees) direction to maintain all older/larger trees is unjustifiable if the agency is sincere in its professed goal of reaching a more diverse age/class/size structure in the Salter area. The reasoning behind this disinterest in stipulating a size/age metric was described to me (David Casey, Dolores District silviculturist, February 2021) was that the inherent inflexibility of a diameter cap (on large trees) significantly decreases the ability to reach treatment targets such as basal area (BA) goals.

Frankly this defense for a “no-diameter cap” approach seems nonsensical to me. If the issue of concern is the inability to reach a basal area goal per acre, that is hardly an excuse to cut larger/older trees. Because older/larger trees are so “poorly represented” as explained in the EA, it would likely be rare that the density of large trees would prevent reaching a BA goal if the BA target was spread across several acres. Certainly, numerous desired condition goals are not and cannot be reached on every individual acre of the project area, and as such a relative high density of larger trees situated in a somewhat tight configuration spatially need not necessitate their removal to reach a BA goal. The EA indicates in some of its narrative that there is flexibility to apply prescriptions as necessary to adapt to variety of localized conditions such as site indices, but evidently this does not apply to the retention of older/larger ponderosas.

In sum, we believe there are numerous reasons in the SEE context to retain larger trees. Ecologically, retaining older/larger trees matches the need to increase biologic diversity across the ponderosa pine landscape which would include the desire to more closely reach the historic range of variability that certainly included many old and large ponderosas (including old, large tree) before fire suppression became a commonplace management

scheme. Socially, forest visitors as a whole seem often to be thrilled by encountering old/large trees – it seems almost everyone has special appreciations for such old and large elements of the forested landscape. Economically, hopefully we are finally on the cusp of understanding, designing and implementing economics-related measures that are based on sustainability. Retaining older/larger trees can help to provide support for a sustained and healthy ponderosa forest on the landscape that can in turn support the full array of economic benefits provided by multiple forest uses and resources. Sure, a lot of large trees could be harvested to provide short-term financial gain, however, that short-term “take” is not comparable to the long-term value of a sustained and healthy forest providing wood products a return interval. And yes, younger/smaller trees might grow into older/larger trees, but in the rapidly changing world induced by climate change there are many unknowns over the horizon. We did not predict the significantly large beetle outbreak occurring now across much of the pine belt in the Dolores District, and we truly don’t know what “twist n’s turns” might be on their way – betting that the current crop of smaller trees will necessarily become the older and larger trees of “yesteryear” does not have certainty that it did decades ago. Other than increasing the profits to the timber contractors that will likely already be sufficiently compensated there is no need – either socially, economically or ecologically to harvest old and large trees.

As stated in the EA, there is no intention or goal of reaching desired conditions across most of the ponderosa landscape with a single entry and though it is incredibly hard to conceive how too many old and large trees might “gum up the works” as we pursue an increase diversity in the structure of the ponderosa forest the agency evidently believes that retaining most of the older/larger trees is not a desirable goal.

We disagree that the assertion made on page of the EA that “Diameter caps were also used which limited prescriptions in meeting the full intent for uneven aged management and economically stabile harvests.” (Page 8) is relevant to the current situation. This page 8 reference is made to the Ponderosa Pine Partnership (PPP) prescription and harvest activity of the 1990’s, an effort that was curtailed and then terminated due to a lack of local industry – hence there was not sufficient time to attempt to reach program goals making it only a partially helpful model for comparative purposes. The PPP effort included a restoration goal, a goal that certainly is applicable to the Salter Project landscape should the agency truly be serious about reaching the desired conditions in a timely manner. To dismiss diameter caps as a management tool due to the PPP experience is “iffy” at best.

The Salter EA contains no information or mention about possible old growth in the project area and therefore we don’t know if there is indeed a lack of old growth or if this is an informational omission. Though there is narrative in the EA that indicates that old trees are “underrepresented” that does not necessarily indicate that there is no ponderosa old growth in the project area as described by DBH, spatial density, age, etc. in literature. Due to the lack of information made available we cannot assert that the EA’s project design criteria are prohibited by the forest plan, but we do note the forest plan goal: “2.2.7 Old growth ponderosa pine, old growth pinyon-juniper and old growth warm-dry mixed conifer forests are more abundant, occupy more acreage, and are well distributed on SJNF and TRFO lands.” Unfortunately, the EA is again deficient on important information to understand the characteristics of the landscape and with that creates a dynamic that makes

is impossible to fully understand the possible and proposed actions of the project including its short term, long term and cumulative effects.

### **Diversity of Economic Interests**

Unfortunately, the EA draws an overly tight focus on the economic consequences of the project proposal as related to the wood products industry and almost entirely dismisses the other local economic drivers, most of which are recreation oriented. Hunting, biking, boating (access to McPhee Reservoir), hiking, camping and others are currently very significant in terms of their economic benefit to the region, particularly the town of Dolores.

Additional “sideboards” are needed to protect the Town of Dolores’s and Montezuma County’s economic and social interests. As a small town adjacent to the national forest, Dolores’s economy and lifeways for both residents and visitors are tightly connected to the array of forest activities and resources. As we interpret the design criteria and the associated action that the EA would enable, the Dolores tourism/visitor economy could very well be “runover by logging trucks.” Other than the on-the-ground conditions based travel closures that are possible (and likely probable) in later winter/early spring, the EA states there will be closures only for specific federal holidays which amount to 10 or so days annually. Somewhere in the mix evidently there is a commitment to a project activity closure around Escalante Days, too. With weekend days all being possible work days with the exception of the holidays mentioned above, the possibility exists for 9 (to many more – perhaps 15) logging trucks rolling through town every day of the week for 80% (figuring a two month winter/spring closure) of the year in Dolores.

This heavy impact on Dolores town residents, businesses and travelers and all users north of town on the county and USFS road system is excessive and an imbalance amongst forest users and the access and use of forest resources. To provide at least a minimal amount of adjustment to the local road use we would suggest that all Sundays through the year be established as “non-project road use days for heavy equipment/truck use.” This would give every local/regional resident and visitor the knowledge (and relief) that they could visit Boggy Draw, McPhee Reservoir access through the Dolores access point, other national forest lands, Granath Mesa, and private properties on Sundays throughout the year without the added stress and worry of negotiating a somewhat narrow and mostly unpaved two lane road.

The Town of Dolores may have additional suggestions for time periods during which road closures for project traffic should be utilized and those should be approved as well. The economic and social well-being of Dolores will not gain much from the Salter Project activities in an economic sense and must not take the brunt of the project’s financial gains that will necessarily be distributed either elsewhere in the county, or even in other counties.

### **Conclusion**

We are extremely disappointed in the quality of this Environmental Assessment. This disappointment is heightened by knowing the lengthy period of time it took to develop the document, the wide array of agency staff involved, the numerous presentations and

discussions that were engaged with the DWRF Collaborative on the project, the associated field tours, and other efforts made in behalf of creating the document. While the EA has an extensive narrative explaining various components of the proposed project, there is a lack of specifics on numerous critical components of the project as well as there being complete voids of information for some key topics (climate, non-forest industry economics, WUI, etc.) There is almost no mention of the benefits of the project as it relates to the possible reduction of wildfire risk – this despite the reality that this component could certainly be one of the agency’s “best marketing” components of the plan – as pointed out by a local municipal official.

The diversity of issues in play and topics needing to be shared with the public, as well as analyzed, is much more than this EA accomplishes. We would recommend a rewrite of the EA with the aim of the second draft being a much more thorough document, or even perhaps engaging the project planning with an EIS if it is determined that the diversity and depth of issues in play necessitates this level of attention. An **insufficient** effort to gather, analyze and share relevant information has the possibility of bringing forth significant economic hardship to the Town of Dolores, a very unhappy (perhaps angry) recreational user public, a mistargeted ecological outcome, and other undesirable outcomes.

The agency had it fully within its possible grasp to design a project that could find adequate balance on the social-economic-ecological “stool,” however, the project explained in this EA does not reach that goal. That lack of attainment leads me to wonder “how could that be?” – but I will speculate that too much deference is being given to the wood products industry and their interests in desiring “as much flexibility as possible” to most easily reach their desired profits. Meanwhile, not enough credence to both the other forest users and the ecological well-being of the forest has been recognized and supported in the project design. Can the balance of the stool be readjusted – perhaps “yes”, but it will entail the industry living with some additional sideboards and frankly we’re doubtful that the agency has the resolve to carry through with that approach.

The Dolores District is receiving scores of comments on this EA – the public is engaged, paying attention and will be closely tuned to the agency’s actions relative to this project. The public comments contain a plethora of concerns, solutions and creative ideas to morph this project to one that is balanced on the SEE stool – we’ll see soon enough if the Dolores District and the San Juan National Forest is up to this challenge.

Sincerely,



Jimbo Buickerood  
Program Manager  
Lands and Forest Protection  
jimbo@sanjuancitizens.org

Appendix A: SJCA Scoping Salter Project Scoping Comments 3.22.2020