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March 20, 2020

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

RE: SJCA Scoping Comments on Salter Vegetation Management Project

Dolores District Staff,

Thank you for considering our comments on the Salter Project. We note that neither the scoping letter or the Salter Project Scoping Package provide a NEPA project number for reference. Our comments are targeted to address both the design of the upcoming Draft or Preliminary EA as well as the topics and issues we view as necessary to be addressed and included in the document.

Purpose and Need

The Salter scoping document includes this Purpose and Need for Action statement: "The purpose and need for this project is derived from the differences between the existing forest vegetation conditions and the desired forest vegetation conditions, as defined by the SJNF LRMP." We strongly recommend that the Purpose and Need (PN) statement be written to reflect much more than "the existing forest vegetation" condition as defined by the forest plan. While the forest/veg condition may be a starting place, the PN statement should include numerous other desired conditions that are detailed in the LRMP and/or have been recognized in the seven years since the plan was finalized. There are numerous ecological desired conditions that should be recognized in the PN statement such as those associated with overall landscape resiliency as related to climate change, watershed function, wildlife, non-forest vegetation, etc. As well, there are numerous social-related desired conditions that need to be recognized in the PN to be sure they are addressed in the project design as well including recreation, the wildland-urban interface, hunting, etc. And finally, there are economic issues expressed in the LRMP to be included regarding such issues as grazing and timber products.

We believe it is vital to provide a robust and all-inclusive list of desired conditions in an effort to design a project that will "as much as possible" meet the wide range, and sometimes conflictive, desired conditions. Unless all of the objectives are delineated and therefore can be addressed in the project design there remains a possibility that important desired conditions will be overlooked and the goal of "finding the sweet spot" of designing a project that meets as many of the conditions as possible will be unobtainable.

Presentation of Possible Management Actions and Development of NEPA Alternatives

The EA should explore and provide numerous possible management actions to meet the desired conditions that are detailed in the 2013 Land and Resource Management Plan. We recommend that the EA provide an array and diversity of possible actions and tools that could be combined to best meet the desired conditions as relevant to the varying conditions on the ground.

Providing only a Proposed Action and a No Action Alternative is an insufficient approach to detailing and sharing with the public a diversity of actions that could be utilized for the project. Rather than attempting to wrap any subset of these possible actions into one or two alternatives, we recommend detailing a list of possible actions that pertain specifically to specific desired conditions and a “discussion” in the draft EA regarding their relative merit and disadvantages. Though the Salter project area is quite often considered a homogenous forest, there is indeed significant variance across this landscape, therefore and by necessity a variety of management tools/actions will need to be utilized across the region to move the forest structure from the current condition(s) to the desired condition(s).

Understanding Current Conditions

As noted in the Purpose and Need for Action statement, the Salter project aims to move the project area from current conditions to the desired conditions that are detailed in the LRMP. While the desired conditions are mostly detailed sufficiently in the forest plan, the current conditions across the 35,000 acre project are not, or at least not as currently available to the public. Fortunately, the Dolores District has taken steps through presentations during the “pre-scoping phase” of the Salter project to lay out the current conditions in a generalized manner, and this has been of good service to stakeholders and the public who have been involved to date.

We strongly recommend that the Dolores District take two actions that are the next steps in disseminating information about the project area that will be necessary to the public’s involvement in the NEPA process. First, the agency should organize and make available the common stand exam (CSE) data and associated files, shapefiles, etc. along with a key or instructions to access this information for use in providing comments in this NEPA project. The CSE should be organized and exhibited to the public in a manner that is easily understandable to the public, preferably in a format that has a visual representation of the data. For the public to “weigh in” from an informed point of view there likely will be a need to explain the data and provide points of context. This is a great opportunity for the public to be further educated about the forest that is their watershed, recreation area, hunting grounds, firewood collection acreage, etc. Ideally the public will be able to review the document and be able to make informed remarks as related to various metrics of their forest from the shared CSE data and other current condition information.

We recommend a thorough examination within the EA of the possible actions that might be employed per the emphasis on the Salter project area being an MA-5 zone. Over the past several years, both in the field and in meetings with the Dolores Watershed and Resilient Forest, I have heard a variety of suggestions from wood products industry members on how best to proceed per the long term goal of maintaining timber production. An examination of the possible costs and benefits of these various approaches would be a helpful addition to the Draft EA to allow the public to understand and weigh these choices. Amongst the possibilities that have been shared with me (and I’m confident that there are many more) are: 1) key the basal area target entirely off the site index, 2) engage a fairly “light” timber harvest in the coming couple years to better set up an earlier return (25 years was suggested) and 3) open the canopy a good deal and target a low remaining basal area to support faster growth among the remaining trees. Hopefully comments from industry will be of sufficient depth and diversity to set a course for the examination of these possibilities within the EA.

Economic Specific Issues

The Draft EA should include an economic analysis utilizing the most current information regarding the varying actions that could potentially be elements of the project. This should include a review of the costs or income streams from the mix of actions including timber harvest, stewardship contracts, small diameter contracts, firewood, mastication, etc. as well as “non-traditional” funding such as RMRI.

We also suggest that the SJNF foster dialog with the county governments associated with the Salter project area (including associated the haul routes for derived wood products) due to the concern that industry has regarding the viability and funding for maintaining and/or improving these routes. Advance and collaborative planning will provide the opportunity to make the smartest investments in the road system necessary to affect the treatments within the Salter area.

Wildland Urban Interface (WUI) Issues

If the SJNF LRMP has a specific definition of WUI we have yet to find it, however, the Salter project needs to have a firm definition of WUI that will support specific management actions in the WUI. Certainly, with all of the work done with the HVRA and other federal as well as state wildfire hazard mapping there will be much data to utilize for project planning – that’s the good news. However, we have the concern that the entire Salter project area will be approached as being WUI which is non-sensical per the reality to apply resources and capacity in a targeted basis per fire mitigation efforts. Intensive “WUI style” treatments are unnecessary numerous miles from critical infrastructure, homes, businesses, etc., however, mis-applying available resources in areas that are truly “beyond the WUI” is a poor use of time, capacity and resources. We all know that the landscape cannot be fire-proofed and therefore we have expectation that the fire hazard mitigation will be defined clearly in the EA and backed by the latest available science.

It would be also useful to the public if opportunities were delineated for “cross-boundary” WUI-related vegetation treatment with the state and private sectors. Identifying these opportunities and anticipating who the partners are along the necessary authorization and funding would be beneficial to potentially maximize the benefits of federal land management actions.

Climate Change

Appendix G in the LRMP provides a good measure of guidance per what should be considered in NEPA processes as related to climate. Though Appendix G is somewhat slim on specifics it does layout some avenues that should be considered in a process such as the Salter project and we suggest that the climate change related issues of forest resilience along with the overall carbon sequestration/balance issue be examined and relayed to the public.

In Appendix G this very specific statement provides the direction we should follow per adaptation and mitigation, “Our primary strategy is to manage for healthy, resilient ecosystems.” The Salter NEPA process should detail the possible management actions to be taken that will provide the forest with increased resilience as related to climate change. Such issues should include choices relevant to canopy composition, vegetation/forest species diversity, basal area, relevance to varying site indexes, and others. With climate models indicating significant change across the ponderosa forest landscape, the EA should map possible decision points and opportunities related to enhancing the resiliency of the forest in the project area. This approach is reinforced in 2.9.9 from Appendix G, “Every 3 years review silvicultural prescriptions for incorporation of strategies that anticipate potential plant succession changes relative to warmer and/or drier forested conditions.”

Appendix G also supplies very specific direction regarding the carbon sequestration/balance issue, from 2.2.19, “The SJNF and TRFO forested ecosystems provide net positive carbon storage” Of course to meet this recommendation the agency will necessarily need to invest in the determination of the carbon metrics related to the Salter project.

Temporary Roads

The Lone Pine objection process spawned language regarding temporary roads that was utilized in the Decision Notice that should be carried forth into the Slater project. The added specificity per road width, grade, decommissioning timeline, etc. are helpful both to the ecologic well-being of the landscape as well as being helpful to contractors by providing the specifics they need from project bidding all the way to termination.

Conclusion

Thank you for your consideration of our comment and please contact me if there is a need to clarify or discuss any of our recommendations.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jimbo Buickerood".

Jimbo Buickerood
Program Manager
Lands and Forest Protection