September 17, 2021

James Simino
Columbine District Ranger
367 Pearl Street
Bayfield, CO 81122

Re: Comments on Southern HDs Landscape Restoration Project, Pre-decisional EA, #58742

Dear Mr. Simino,

We appreciate the opportunity to provide comments on the Southern HD's Landscape Restoration Project Pre-Decisional Environmental Assessment (PEA). Great Old Broads for Wilderness is a grassroots organization led by women, with its national headquarters in Durango, that engages and inspires activism to preserve and protect wilderness and wild lands. Founded in 1989, we have 8500 members and supporters, as well as 40 local chapters across the United States, who work on education, advocacy and stewardship for our nation's public lands.

We value the District's efforts in the Southern HDs PEA to recognize the ecological role of fire and the history of disturbed fire frequency and forest management factors that have impacted southwestern forest structure, ecology, and function. We appreciate the plan for prescribed burning at restricted times and conditions as a principal management method across the entire project area of 35,000 acres. We concur with a need to consider the wildland urban interface and proximity of private land and homes when evaluating wildfire hazard reduction methods.

However, we do believe that more can be done to protect large diameter trees, and most importantly, large diameter trees as a part of healthy, functioning ecosystems. We are concerned with the extensive size of the project area where "forest restoration across such a large area does not allow for some of the site-specific analysis that is needed to ensure protection of old growth ponderosa pine ecosystems.

In addition, we note our particular concern that there are map and map layers that appear to be missing in the overall analysis, as noted below.

Finally, we are pleased that the Armstrong Canyon OHV trail has not been included in the PEA, and feel that this is an important step to maintain the important values of the

HDs for migration of elk, mule deer, and other species; and for habitat for sensitive species such as flammulated owl, Northern goshawk, Olive-sided flycatcher, Lewis' woodpecker, hoary bats, fringed myotis, and others that may be present, particularly in older forest ecosystems.

TIMBER AND OLD GROWTH:
Our most urgent concerns revolve around the lack of specific and detailed attention to old growth ecosystems within the HD Mountains. Note the importance of old growth stands, particularly ponderosa pine, as mentioned in the San Juan National Forest Land and Resource Management Plan (SJNF L&RMP), updated in March 2021:
"3.25 HD Mountains Vegetation: The HD Mountains support a variable mix of vegetation types, ranging from sagebrush to cool-moist mixed conifer forests. Old growth ponderosa pine forests and aspen forests still stand in portions of the HD Mountains area. The stands of old growth ponderosa pine in the HD Mountains area are particularly important (because this is a rare resource in the planning area). In addition, Townsendia globella and the riparian natural plant communities of boxelder-narrowleaf cottonwood/red osier dogwood forest, strapleaf willow shrubland, and narrowleaf cottonwood-rocky mountain juniper forest are also important vegetation types of the HD Mountains."

Likewise, it is our understanding that the SJNF L&RMP authorizes only prescribed fire in old growth vegetation areas, and only after proper field review and documentation of analysis, as stated:
"3.25.20 Management activities avoid disturbance to old growth vegetation. Prescribed fire may be used in old growth vegetation areas after site-specific field review and documentation of analysis and affirmative decision is completed."

We appreciate the plan to retain "old ponderosa pine established prior to approximately 1880", but are concerned that the existing old growth inventory completed for the HDs by SJNF has neither been mentioned or included. The inventory should be evaluated and utilized for a project of this size and importance, and all GIS data and maps should be included in the analysis and available for the public to consider as part of the project record. Due to the limited extent of old growth ponderosa pine on the SJNF, an extra effort must be made to protect these trees, and in particular, the unique ecosystem that they support. In other words, special evaluation based on pre-existing data, as well as potential new analyses, should be done to ensure the protection of entire old growth ponderosa pine ecosystems in the limited areas where they occur.

The lack of mention of the old growth inventory and the failure to include GIS data and maps in the Pre-Decisional EA would indicate that proper analysis, documentation, and field review has not been accomplished. It does not appear that the following screening against the current SJNF old growth database has occurred as described in the SJNF L&RMP:
"2.2.74 Prior to any proposed agency actions on forested lands or woodlands, the affected stands should be screened against the current SJNF old growth database in

order to determine their old growth status. Within landscapes not meeting desired conditions for old growth, ponderosa pine forest stands and mixed conifer forest stands that currently are not in the old growth development stage, but that contain significant old growth attributes should be prioritized as old growth recruitment areas, largely based on tree age and distribution across the SJNF, and managed for their old growth values."

We recognize the significance of protecting old growth forests from potential wildfire in an era when climate change is leading to increasing fire severity and intensity. It is precisely for this reason that the old growth inventory must be used, allowing for full analysis of GIS layers and related data. This approach would allow for location of old growth trees that are particularly at risk of burning when either wildfires or prescribed burns might get out of hand. Utilizing the existing inventory and GIS layers, a more detailed protection plan could be developed for these unique and ecologically significant areas.

Concomitantly, the old growth inventory would provide valuable information to determine which forest areas have value as old growth. We do not believe that looking only at old ponderosa pine established prior to 1880 is a scientifically-valid characterization of "old growth", and certainly not of old growth forest ecosystems. There are substantial numbers of trees that are over 80 years that should be protected for their ecosystem value, as well as their importance for future old growth recruitment.

Lastly, we appreciate the retention of large diameter (>6" Gambel Oak), but fail to understand where they might be cut where it would present "an immediate hazard to retention of desirable trees within clumps or groups". In these cases, we would recommend retention of the large diameter trees adjacent to clumps or groups. We also note the care needed when masticating or removing oak brush in areas noted in the SJNF FL&RMP as relatively unique for bear habitat: "The relatively unique occurrence of oak brush on north-facing slopes in the HD Mountains adds to the importance of the area as bear habitat."

ROADLESS AREAS:
Overall, the protection of the more than 25,000 acre HD Mountain Roadless Area and its important wildlife, recreational, and roadless values appear to be considered for protection through implementation of the BMP and EDE in Appendix A. However, we are surprised that there is no overlay map of roadless areas in the project map, and an insufficient delineation of the Roadless Area that would indicate that its significance has been fully considered within the PEA, and that managers will give it the full consideration that it requires.

The HD Mountains area includes the 25,140-acre HD Mountain CRA. This area is important for recreational opportunities, pristine and primitive conditions, wildlife habitat, and roadless values (including those described above). The roadless area may also take pressure off of the more heavily used wilderness areas and WSAs within the

planning area by providing solitude and quiet, as well as dispersed recreation opportunities.

CULTURAL RESOURCES:
The HD Mountains are traditional homelands of the Ute/Nuuche people, and the HDs are in close proximity to the current day Southern Ute lands. It is unclear based on the Cultural Resources section whether the Southern Ute, Ute Mountain Ute, Ute Indian Tribe of the Uintah and Ouray Reservation or others have been consulted or whether the SJNF has documentation of trees of cultural value to the Ute people, such as those used as mother trees, cradleboard trees, cambium cuts, trail blazes, etc. We raise the question as to how such trees and related culturally significant areas will be protected, and whether culturally-appropriate documentation has taken place.

We appreciate the opportunity to comment on the Southern HDs PEA and look forward to continuing to engage in this process.

Sincerely,

Executive Director