



Beverly Compton, [REDACTED]  
 September 16, 2021

**COMMENTS - SOUTHERN HD'S LANDSCAPE RESTORATION PROJECT DRAFT EA**

Page #	Topic	Paragraph	
No page #	Why is Bull Creek, Little Bull Creek and Fosset Gulch road in this area excluded?		See included addendum as to why the entire Bull Creek watershed should be included.
No page #	The Chimney Rock view shed must be addressed in this EA and how this proposed action may be out of the view shed compliance.		
No page #	Where is the proposed new road in Bull Creek to be, where are the construction documents in this EA? Provide map/documentation.		
No page #	12/20 scoping issue summary	page 2	Document states that Armstrong/Trail/Long Canyons are too dangerous for RX fire because of topography, smoke, drought. Provide in this EA where those conditions are in other canyons/streams in this EA that match those conditions and are unsafe for these proposed treatments.
No page #	new well sites		No where in this EA is there a list and accumulative impacts of all new, proposed well sites on this landscape and the environmental consequences. These potentially new well sites must be factored into the EA.
Page 5	Introduction	1st bullet point 2nd bullet point	What is the desirable fire behavior and beneficial fire? Describe improve forest and ecosystem resilience for what species? Providing habitat without knowing what species are present and what is not is not ecology or ecosystem science, it is just hopeful wishing. Habitat without knowing if anything is inhabiting it is meaningless in attempting to understand if the treatment goals are met.
	Cultural Resources	3rd bullet point	SJNF needs to re-study the landar photos to re-establish where the cultural resources are and what has been destroyed by oil and gas drilling. NSJB CBM EIS - "there are many known sites that have not been evaluated. This sites must be evaluated before any disturbance is created.
	Reduced fuel plan	4th paragraph	Reducing fuels also leads to compaction of soil, burning slash sterilizes the soil and leads to weed infestation later on - both requiring high maintenance by a land management agency SJNF that has already admitted failure in noxious weed control. What does the SJNF plan to do different to manage this problem?

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	Wildlife	5th bullet point	improve wildlife habitat diversity for what species? What wildlife species are there, what species are missing, what are the number of each species habitat diversity will be created for? If you do not know what and how many wildlife species there are now on the land than improving wildlife habitat is meaningless.
Page 7	Wood demand	5th paragraph	In board feet, what is the local demand for wood?
Page 8	Forest Health...	1st paragraph	What is the desired vegetation conditions to benefit what wildlife?
	Wildlife Habitat		What wildlife habitat will this project benefit besides deer and elk? What pre-activity wildlife surveying/counts be done beforehand for what species? Noxious weeds will overwhelm all openings made for deer and elk. This can be seen on every 2 acres oil/gas well pad on the HDs,. Once you disturb the land, and weeds take hold and you can never completely remove them, you can on control them yearly, the weeds have moved deep into the undisturbed areas and needs to be controlled. Saving topsoil, which is non-existent on the HD's has become completely covered in or non-native noxious weeds, leaving the saved topsoil useless.
	Wildlife	4th paragraph	Overall goal of improving forest health for what wildlife species? What are the numbers and health of the wildlife species now? How will these species be monitored to insure improvement happens? What wildlife species are present now? What species are missing?
	Control Lines	6th paragraph	The statement that most control lines would be narrow features that may be restored... weed control of control lines will have to be done multiple times every year. One you open the the forest and disturb the soil you can never completely remove noxious weeds that will be there.
Page 8	Summary of Need	1st paragraph	Outcome - healthier over story trees - because of the warming climate, what scientific evidence is there that the act of burning under large Ponderosa trees and other tree species actually damages the health of these over story trees and they do no recover? Please list the native wildlife species other than deer and elk that will benefit from this proposed project. What wildlife species, especially closed canopy, dark timber dependent species will be harmed? What are their current numbers and how many will be lost?
Page 11	Proposed Action	1st paragraph	"will move project area towards desired conditions" desired conditions for what wildlife species and harm what species?
		2nd paragraph	"phases over several years" how many years?
		3rd paragraph	"one mile of temporary roads" no new temporary roads should be added. Fosset

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	Temporary Roads		Gulch road and Bull Creek road are lined with noxious weeds and invasive native plants like the common sunflower and now those highly damaging species are found deep in the forest. The same infestation will happen with any new temporary roads.
	Fire lines etc.	4th paragraph	Cutting of any fire lines, control lines, any hand lines will never, ever be restored back to its healthy, native condition. Cutting these lines insures a continually seeding of non-native plants into the forest and is wrong. Support of fire crews etc. - list in detail the destruction that may occur to the native landscape if these fire support vehicles would need to be used and where that may happen?
	Disturbances	5th paragraph	Same question as above - all disturbances caused by the many potential thinning machinery will for ever damage the soil and will not be "restorable" Provide on the ground examples where restoration has happened, long term. Please provide a map where public firewood collection and small commercial firewood sales might happen. Will new roads/trails be created to do so?
Page 12	Mature Oak	1st paragraph	Provide proof on the ground, post mechanical thinning where the soil has been completely restored and no weeds are found. If there is none, then a new plan is required.
	Goats		Managed grazing by goats - will the goat herder be with the herd 24/7? If not, why not? Let's not teach predators to kill livestock including goats. Goats cannot eat/remove small diameter trees that are ladder fuels, remove this from the EA.
Page 12	Trees	General Comment - Trees	In general, I am very concerned about the cutting of trees on the HDs. The impact of rising temperatures and that affect on these trees. Heat stress on seedlings ability to survive and grow, and lack of water to sustain new trees. Ponderosa Pine trees are struggling to grow because of the heat and lack of moisture If you open the forest will the species survive?
	Design Elements	Wildlife	Other than deer, elk and peregrine falcon what other wildlife species will benefit from this action and what species will be harmed and harmed to what extent?
	Recreation	Prescribed Burning	How will the general public be notified about these burns. I hike in Bull Creek every week.
Page 13	Timber	2nd paragraph	Where, when and how many acres are planned for timber harvest of Ponderosa Pine trees?
Page 14	Target stand structure		Dead standing, falling down and on the dead ground trees must be saved for wildlife.

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	Old Ponderosa		Please mark so they are not cut down.
Page 15	Aspen	4th paragraph	Any and all Aspen should be saved and allowed to spread after any tree treatment. More Aspen will provide expanded wildlife habitat and is a tree species that can slow down future wildfires.
Page 23	Climate Change	2nd paragraph	With the growing concern and evidence that warmer temperatures and decrease in moisture is decreasing the re-generation of younger trees. The notion of treating a "larger percentage of the analysis area" must include smaller size areas, spread across many years so we will know if the strategy actually worked and did not leave a non-regenerated forest. Because of climate change you cannot treat a large percentage of the analysis area because you simply do not know what climate change will do to the openings you create.
	Noxious Weeds	5th paragraph	Noxious Weeds and Invasive Plants - any plans, activities and efforts to control noxious weeds and invasive plants in general, on the forest is a complete failure. Once they are introduced they move quickly into the forest and no one is going to control them every year. Missing from this noxious weed table is the native yellow sweet clover and common sunflower that is taking over all open, disturbed areas. It no longer matters whether they are on any noxious weed list or not, the evidence in the field is clear. These two species are a great threat to plant biodiversity and food for wildlife.
Page 24	Noxious Weed Table	Page	
Page 25	Invasive Species	1st paragraph	"The proposed action has the potential to spread invasive species". This statement is scientifically wrong - the proposed action <b>WILL</b> spread invasive species and All SJNF plans, efforts and intentions to control noxious weeds on the forest has failed. To continue the same rhetoric about control is meaningless. There will be no mitigation, design measures that will stop the spread, SJNF cannot treat and does not monitor the never ending spread of noxious weeds and invasive species. This portion of this proposed EA must have a new plan that is based on widespread out of control weeds. Don't believe me, meet me in Bull Creek and I will show you first hand. The EA statement: In general, we expect noxious weeds will continue to spread Addresses the SJNF's willingness to continue to try and use the same methods That have proven not to work. SJNF cannot continue to do the same thing over and over and expect a different outcome. If the SJNF knows weeds will continue to spread then as the lead stewards of this land its time to develop a new, more

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Page #	Topic	Paragraph	
Page 25	Invasive Species	1st paragraph	effective way of dealing with weeds BEFORE any action in this EA is taken. Weeds are everywhere, the Forest Service has failed and the well owners have failed in their responsibility of controlling weeds.
Page 25	Flora Species	3rd paragraph	Threatened or Endangered Flora Species - there is SW Willow Flycatcher potential habitat on the Piedra River at Bull Creek - mapped by the USGS and potential Yellow-Billed Cuckoo habitat also at this location, mapped by the U.S. Fish & Wildlife Service and Rare Plant Species Occurrences on the HD, in the planned area by the Colorado Natural Heritage Program. Mexican Spotted Owl habitat may also occur in and around Bull Creek but no one is looking. All mapped endangered species on the Piedra River are outside this plan BUT if SJNF is going to use conservation biology to direct this plan then the Piedra River impacts but be considered and included. The Knowlton's cactus may occur in Bull Creek and may not have been found simply because no one has looked for it. The potential habitat is there.


**U.S. Fish & Wildlife Service**  
**ECOS Environmental Conservation Online System**  
*Conserving the Nature of America*

[ECOS /](#)  
 Yellow-billed Cuckoo (*Coccyzus americanus*)



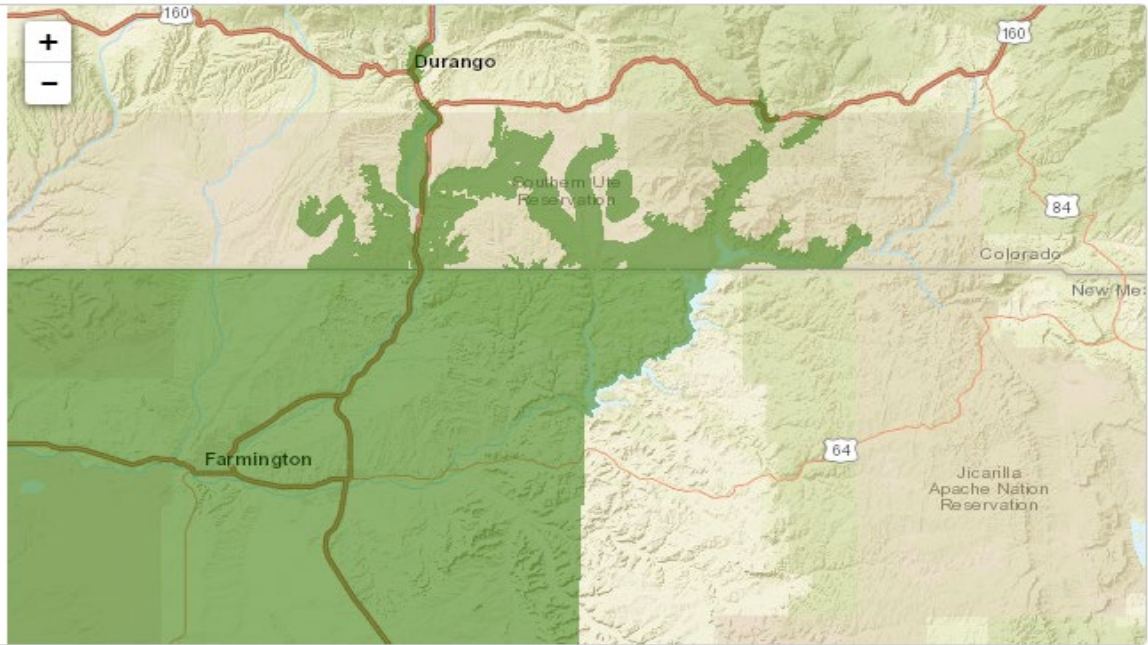
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Page #	Topic	Paragraph
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U.S. Fish & Wildlife Service  
**ECOS Environmental Conservation Online System**  
 Conserving the Nature of America

ECOS /  
 Knowlton's cactus (*Pediocactus knowltonii*)



Page 25	Sensitive Plants	Last Paragraph
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Region 2 Sensitive Flora Species  
 What is the age of the plant species inventory used in this EA? If it is older than 10 years then it is useless. Climate science has already documented the loss of plant species to increased heat and the movement of plants to survive. Current, comprehensive field inventories need to be done to insure nothing is lost simply because no one looked.

Page 25	Sensitive Plants	Last Paragraph
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The notion in this paragraph that nothing will be lost or not effected is not science; it is the re-using or simple clerical copying and pasting of old science and is not ecology, climate science or even current nor accurate. If there was no harm to plants at risk there would be no reason to proceed. Those species that may be affected need to be found, flagged and not harmed. Species are lost by losing one individual of a species at a time.

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<b>Page #</b>	<b>Topic</b>	<b>Paragraph</b>	
Page 25	Sensitive Plants	Last Paragraph	Astragalus iodopetalus (violet milkvetch) found in Chimney Rock. Bull Creek and nearby area is the same landscape as Chimney Rock. If no known populations are not known its simply because no one has done a thorough field inventory. Repeating the same "science" found in previous EA is not doing science is "copying and pasting" and this is not land stewardship. Get out there and look. If this plant is found at Chimney Rock it will be found on the forest nearby. Again, go look, loss of species happens one plant at a time and with global warming we cannot afford to be responsible for the loss because we simply cannot be bothered to look.
Page 29	Plant Inventories	5th paragraph	Missouri milkvetch - what is the date of the last field inventory of this species? If it is more then 5 years old then another inventory is critical. If the habitat is present then the known locations is meaningless unless all locations of the habitat are field checked for this species. A Botanist much be present on the ground during the implementation of this project.  Again, the notion that weeds will spread and SJNF will simply continue doing what it has always done and expect a different outcome is not management. This is not land stewardship. All other potential endangered plants and plants of concern with no protection - the above comments apply
Page 30	Aztec Milkvetch	4th paragraph	If this species is found at the Chimney Rock National Monument then it existed on the eastern side of the HD's on national forest lands. A through field survey must be done to identify and flag this species. A Botanist must be present during the implementation of this project to insure these plants are not destroyed. Extinction happens one plant at a time; find them and protect them. Every EA and EIS states that individual species may be lost but not the species. Species are lost one individual at a time. Determining that no harm will be done is using the same, old, species destructive rhetoric and is protecting nothing.
Page 31	Yellow Lady Slipper		You cannot say none of this species has been found in the same sentence that says no specific survey have occurred. This EA is the time to thoroughly

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<b>Page #</b>	<b>Topic</b>	<b>Paragraph</b>	
Page 32	Stream Orchid	2nd paragraph	<p>search for this plant. Do the field inventory work before you cause more damage.</p> <p>There are pockets of Cottonwood/Willow in the stream course of Bull Creek and surrounding lands. These pockets must be inventoried for this species. It may be too late to do so this summer and may require doing so next spring. This EA states that "while we are unaware of any stream orchid populations" if SJNF is unaware because no one has gone and looked then its time to go look for them.</p> <p>Again, species are lost one plant at a time.</p>
Page 34	Bull Creek - Piedra River	Chart	<p>The chart talks about the watershed and yet the entire watershed is not in this EA. The entire watershed up and including the headwaters of Bull Creek must be included if the SJNF is going to do landscape science instead of subjectively boundary line drawing. Burning 45% of the lower half is unsustainable. With the warming climate and the lack of any current field inventory of important plant and animal species may be lost. What are the plans for prescribed fire and mechanical treatment on the upper half of Bull Creek? Are they consistent with what is planned here? The old growth mapped stand of Ponderosa Pine trees just after the confluence of Little little Bull and Bull Creek needs to be saved and the gambel oak underneath needs to be removed.</p>
Page 35	Affected Watersheds table	Entire page	<p>Combining the Southern and Northern HD's landscape restoration plan affected watersheds, 41,185 acres are proposed to be altered.</p> <p>These two EA need to be combined into one EIS and all of the impacts needs to be addressed at the same time using the most current climate science. The two EA's plan to remove 74% of the vegetation in the Bull Creek watershed. Explain how that can possibly be sustainable? How will you control noxious weeds? Where have you removed 74% of vegetation and what is there now? Weeds?</p>
Page 36	Opening Forest Canopy	Last Paragraph	<p>What harm will opening the forest canopy in Bull Creek do to the potential SW Willow Flycatcher and Yellow-Billed Cuckoo habitat right at the Piedra River where all sediment runoff from Bull Creek would flow?</p>
Page 37	Road system	1st paragraph	<p>Currently the EA states that roads in the area comply with the road density guidelines. When adding new well pad roads will the road density be out of compliance?</p>
		2nd paragraph	<p>Precipitation of 15 - 29 inches per year. What years does this cover? If it is not the Precipitation from the past 5 years of climate change these numbers need to be updated.</p>



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<b>Page #</b>	<b>Topic</b>	<b>Paragraph</b>	
Page 38	Soil Compaction	3rd paragraph	Provide evidence of successful noxious weed control after significant soil compaction activities such as these that are planned. If there are no successes then how to control noxious weeds needs new science and plan before any soil disturbance is done. No new temporary roads in Bull Creek, there are noxious weeds everywhere, on the hillsides, below the roads and ATV trails and deep into the forest. The SJNF has already admitted failure in the control of weeds to creating another road for them to travel is failure on top of more failure.
	New Roads	4th paragraph	No new roads. SJNF are the Stewarts of our public local lands. Every new road means more traffic, more ATV traffic which is more noise, more garbage, more inappropriate behavior and harm to the natural world and more weeds that SJNF cannot control and has failed to do so. Leave the last remaining unroaded areas alone to offset the miles of roads leading to oil and gas well pads and other related structures.
	Rehabilitate roads		Provide several examples where weeds have been eliminated on any rehabilitated road. If there are no examples, then the rehabilitation is a complete failure and new science and methods must be created before any of this road building is done.
	Bull Creek new Road	Last Paragraph	Until the forest service and the well owners in Bull Creek completely eliminate all the noxious weeds along the existing road, ATV trails and deep into the forest, no new roads should be made. The forest service has failed. The sides of the roads and well pads are completely covered in yellow sweet clover and now common sunflower. This is an ecological disaster and failure. The weeds can be found up above and far below the road and ATV trails. I've been there and have many photos.
Page 39	Best Management Practices Rehabilitation of Temp Roads	1st paragraph	Because of the uncontrolled noxious weed infestation all roads and ATV trails Best Management Practices is a complete failure. Rehabilitation of temporary roads will be a failure. Once the weeds are established you cannot remove them unless you remove the plant, the root, the seeds and bring in new topsoil, destroying some other place and water twice a day for 2 summers. Provide evidence of temporary roads on the HDs that rehabilitation was complete and a success. New science and plan must be created before making any temporary roads. Let's not continue to fail.

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<b>Page #</b>	<b>Topic</b>	<b>Paragraph</b>	
Page 39	Skid trails etc.	2nd paragraph	With warming climate there is no guarantee that all the ground disturbance will ever return to its natural state and the combined ground disturbance may cause more harm then doing nothing. What proof, on the ground
			is there of recent skid trails etc. at this elevation have completely recovered? This is all conjecture, not based on actual success. The hillsides at the bottom of Bull Creek from the forest service fence up stream, right side or north side is covered in foxtail. What disturbance will happen in this area and what actions will be taken to not drive this noxious farther upstream?
Page 40	Stream impacts  Bull Creek Cottonwood/ Willow pockets Functioning at Risk	2nd paragraph	"most stream system currently fall into the at risk or diminished classes" and the forest service wants to do similar activities in this plan and states that more disturbance will not future harm these streams? This is not science but wishful thinking. Where is all the disturb soil going to go? What if a prescribed fire blows up and damages or destroys a stream? What happens to those stream banks that are not heavily covered in vegetation allowing sediment to flow into the creek bed. There are a least 3 cottonwood/willow areas in Bull Creek's creek bed just below Bull Creek ATV trail 682 where it crosses the creek bed. Have these been inventoried and will they be protected and the rest in the creek bed? Creating bare soils and those soils flushing into these at risk streams will only make all of these steams more vulnerable to increased destruction. Future exasperating SJNF's failure to protect. Flushing soils into these streams WILL NOT protect, soil, aquatic and riparian systems.
Page 41	Impacting the Piedra River	1st paragraph	"mechanical treatment - done on lower slopes..." These type of treatment may very well impact the Piedra River from Bull Gulch. If 66% of the vegetation is removed soils will flow into the creek and into the river. Affecting USGS mapped potential habitat for the SW Willow Flycatcher and US Fish & Wildlife mapped Yellow-billed Cuckoo potential habitat.
Page 44	Fish and Wildlife 1996 US Fish &	5th paragraph	Any document/study/assessment done is 1996 does not have current critical climate science driving the analysis and the impacts of water

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<b>Page #</b>	<b>Topic</b>	<b>Paragraph</b>	
Page 44	Wildlife Assessment	5th paragraph	use and prescribed fire. The SJNF as the managing organization of the public lands on the HDs and MUST revisit this biological opinion and have it updated with current, critical and dire climate science.
Page 45	Federally listed terrestrial wildlife species	1st paragraph	The EA states "no affect" on federally listed terrestrial wildlife species and yet The San Juan Forest Plan contains no obligation to conduct monitoring or surveying of species within a proposed project area. which means you have no idea what is there and what is not.
	Eleven Terrestrial FS sensitive fauna species	2nd paragraph	What species have become more at risk since this list from 2013? All species listed have plenty of habitat BUT if you do not know that the species is there GREAT HABITAT IS MEANINGLESS. Of all species listed, what is the population currently of each? What current field science and inventory that supports the statement that none will be harmed? Climate science says many species are in serious decline. Which of the listed species are? The NSJ CBM FEIS states that "very low number of goshawk active territories" a study prepared sometime prior to this 2009 FEIS. With the decline of these watersheds what is the current active territories and has it declined even more? Removing vast areas of vegetation will decrease the prey animals this species requires. What is the plan to prevent additional decline of the Northern Goshawk because of absence of prey?
	Northern Goshawk	4th paragraph	This chart demonstrates no impact or only impacts to individuals. What is the date of the science used to create this chart and does it precede climate science and the accelerated rate of species decline? How many proposed and existing EA's and EIS say the same thing - no impact across the forest? How can all species be ok when their habitat - watersheds and the planet is in decline? What species are in decline?
Page 46	No harm to sensitive wildlife species	Chart	
Page 49	No decline in Habitat	1st paragraph	"Without implementation of the proposed action, there will be no significant change in the amount and distribution of habitat for these species". This is patently false, the science in this EA states that all streams are "functioning at risk" you cannot have declining habitat and state that all species are not in danger. The science in this EA is highly contradictory and must be corrected.
Page 50	Effects -	2nd paragraph	"The effects of past projects upon the evaluated species cumulatively

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<b>Page #</b>	<b>Topic</b>	<b>Paragraph</b>	
Page 50	Inconsequential and Insignificant	2n paragraph	are inconsequential and insignificant". You cannot manage overall decline of the potential for a stand replacing fire and state that 1. with doing harm to species and say there's plenty of habitat in adjacent stands - the same habitat you are trying to lower the fuel load. You cannot have streams in decline and not have habitat and species in decline. This not analysis nor science it is simply hopeful thinking.
Page 51	Impacts on Roadless areas	Entire page	"Uncontrolled fire could create bare, sterilized soils that would lead to erosion and impact water quality." If the areas that are opened through this project do not revegetate but become covered in weeds what is the harm done to the habitat and species. The EA already states that " In general, we expect noxious weeds will continue to spread" All of the well pads are now completely covered in weeds and will be a seed source for ever. The proof is clear, opening the forest and expecting it to recover is a failure. The same will be true of this project. SJNF has failed in their responsibility to control weeds. This project will be no different - skid trail soil compaction will not recover but be another continuous weed seed source. Need for SJNF Archeologists to be one the ground during all project disturbances: SJNF LRMP – Page C-28 There is a high probability of finds on the ridge or mesa tops, in the meadows, and along the intermittent stream drainages. Page 3-561 “Given the fact that only a small amount of systematic, intensive up-to-date cultural resource surveys have been conducted in the APE in comparison to the entire Southern Colorado River Basin context area, the potential context area, the potential for finding additional important archaeological sites within the APE is consider good. Go find them The 2006 NSJBCBM EIS states: In the southeastern portions of the APE elevations – there is an increase in sites (cultural resources) at higher elevations Chapter 3, page 3-553. Go find them. The landscape of the Chimney Rock National Monument is the same landscape as the Southeast portion of this proposed project and the high probability of new findings must be taken seriously. Current GIS information will not include these yet to be found sites and Archeologists must be present, in the field to find them when the land is being disturbed through this project.
Page 52	Cultural Resources		
Page 53	Cultural	1st paragraph	If Archeologists are NOT present during the proposed disturbances

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<b>Page #</b>	<b>Topic</b>	<b>Paragraph</b>	
Page 53	Resources	1st paragraph	new finds will not be found and protected and this plan will adversely effect the important cultural resources. This plan does not succeed in protecting cultural resources if only existing data and locations of finds is used.
	Class III Intensive Inventory	3rd paragraph	When will the "class III intensive inventory occur for cultural resources? When will this document be available to the public?
Page 55	No EIS	Entire page	<p>Compelling reasons for a EIS 1. disturbed soils may never revegetate and become weed seedbanks into the future - visually impairing human use.</p> <p>2. All areas that will be prescribed burned must be included as disturbed soils and weeds must be controlled there far into the future. There is no guarantee that the burn areas will re-vegetate leaving a permanent seed bank of weeds.</p> <p>3. Impacts to cultural resources - will be significant if archeologists are not on site during the disturbances to find/locate and protect NEW cultural resources.</p> <p>4. The use of current science and climate science is not found in this EA and because of the rapidly deterioration of our local climate this science must be used.</p> <p>5. "the forest service has considerable experience in the types of activities planned and yet all streams are "functioning at risk" clear evidence that what the forest service has done in the past is not working, in fact failing. New science and new implementation is required.</p> <p>6. "None of the resource impacts analysis identified any significant cumulative impacts" The complete failure of control weeds on existing well pads is overwhelming, all well pads are covered in weed and this is significant</p> <p>7. "This project will have "no adverse effect" on cultural resources" no adverse effect on those already found, adverse effect on new cultural resources that will be destroyed in this project because no one qualified will be looking for them during the activities.</p> <p>BA's for Federally listed species - no impact. Any impacts to the Piedra River at the bottom of Bull Gulch will impact the USGS mapped potential habitat of the SW Willow Flycatcher and US Fish And Wildlife mapped Yellow-Bill Cuckoo. The language "when possible" is the same language used in the 2009 and has clearly</p>

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<b>Page #</b>	<b>Topic</b>	<b>Paragraph</b>	
Page 55	No EIS	Entire page	proven that when possible means nothing will be done and the land will continue to deteriorate with weeds and garbage left behind.
Page 67	Wildlife	2nd paragraph	NSJB CBM FEIS and has no regulatory control. "when possible" has repeatedly been proven to be meaningless. The forest service and well owners do not heed the request. We cannot "request" we must insist what needs to be protected or the level of protection during this project.
	Live, Dead Standing Trees		Live and dead standing trees with cavities must be flagged so they are not damaged.
	District Biologist		The district biologist must be out in the field searching for important, endangered plant and animals during all disturbances planned.
	SW Will Flycatcher Yellow-Billed Cuckoo		The USGS mapped potential SW Willow Flycatcher and US Fish & Wildlife Yellow-Billed Cuckoo habitat along the Piedra River at the mouth of Bull Creek cannot be harmed because of sediment run-off from Bull Creek because the SJNF has had 47% of the vegetation removed in lower Bull Creek.
	Watershed		Existing pockets of cottonwood/willow in Bull Creek's creek bed must be clearly marked.
	Debris Entering Streams		Removing debris in stream - not to exceed 2 days - by then all life in the stream will have been killed. Debris must be removed immediately and the stream must be left to recover before work is continued.
	Crossing Streams with Machinery		All stream crossings, landings, the number of times each stream will be crossed, skid trails, constructed, reconstructed on existing and temporary roads must be included on the list of overall disturbed lands in this EA. These disturbances must be on a list of those areas that need regular checking and re-habitation, and done as many times as necessary Soil compaction will not recover but be another continuous weed seed source.
	Weeds, Weeds, Weeds		A new plan and strategy must be implemented in this EA as to the how control of noxious weeds will be done and what the frequency of doing so will be.
Page 69	Soils Old Growth Recruitment Trees Pre-settlement trees	Bottom of Page	All soil disturbance from the spreading of slash must be recorded on the master list of disturbance and also monitor and rehabilitated as many times as necessary. Older trees that are candidates to become old growth trees must also be protected. Slash piles saved for later burning must also be included in the overall

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Page 69	Soils	Bottom of Page	area of disturbance in the EA and must be checked and rehabilitated as many times as necessary to insure restoration success.
	Noxious Weeds		How will the pre-treatment and post-treatment of noxious weeds be done? The Forest Service botanist must be present during all operations to insure that invaluable plant species are not lost. Providing materials for crews to use is ineffective and unscientific.
	Special Status Plant Species		
	Knowlton's Cactus		On the ground, field surveys must be done BEFORE any disturbance is done as a part of this EA. Providing materials for crews to use is ineffective and unscientific and speaks directly to the Forest Service's lack of commitment to protect valuable plants.
	History Properties	Cultural Resources	Because of the high probability of unknown cultural resources the Forest Service has listed in several EA's the Forest Service Archaeologist must be present during all disturbance listed in this EA to insure that important cultural resources are not lost.

## BIOLOGICAL EVALUATION FOR SOUTHERN HDs ECOSYSTEM RESTORATION PROJECT DRAFT EA - Bevely Compton

Page #	Topic	Paragraph	
page 1	Abundance of the Species in the Region 5	2nd paragraph	Provide on-the-ground field inventories of all species done in the last 5 years. Anything older will not capture the affects of climate change, a warming planet and drought.
	Are suspected of occurring	3rd paragraph	The term "suspected" is not science but guessing and hoping these plant and animal species are present. If you do not go out and count the plants and animals you really have no idea what's other there. Guessing is a layman's term
Page 3	Total area to be altered	1st paragraph	Any form of landscape ecology, landscape science, conservation biology always looks at the larger landscape when proposing a new project. This EA does not. The Northern HDs ecosystem Restoration Project proposed to alter 13,646 acres or a total of 48,646 acres of the HDs. This is the landscape that is about to be altered. Where is the science in this BE that describes, in detail, the overall impacts on plants and animals. How many years will this project take? New, temporary road cannot be constructed, it will become a endless conduit for well established noxious weeds that the SJNF was admitted it cannot control. The overall acres to be disruptive is 35,761 and needs to added to the beginning of all documents.
Page 4	total area to be altered All disturbed areas	1st paragraph	Again, all acerage on the HDs about to altered must be studied, factored in and reported. All distrubed areas mus be account for in the total acerage that will need to be rehabilitated including control lines. Once you dig down to the mineral soil you have removed all of the existing plant life. What does the SJNF think will revegetate these lines?
	soil disturbance	2nd paragraph	A master list of calculated soil disturbance is needed and the soil disturbed including rubber-tired or tracked skidders, forwarders, mechanical harvester, stroke de-limbers hydro-mower hydro-axe and slash piles that once burned will leave disturbed soil ready for noxious weeds that once burned will leave disturbed soil ready for the noxious weeds the forest service admitts that it has failed to control.
	Goats	last paragraph	Goat herders must stay with the goats overnight so predators do not kill them. We do not want to teach the predators about goats and killing them. Location of goat herds with dogs must be made public BEFORE they are in place so those of us hiking with our dogs can avoid the area.
Page 5	Wet soils, damage done	2nd paragraph	Wet soils that are damaged by equipment must be added to the master list of soil disturbances and actively revegetated.
Page 6	Stream crossings	1st paragraph	Stream crossing must be added to the needed master list of soil disturbances and actively revegetated.
	Minimize connected disturbed areas	2nd paragraph	the term "minimize" has no regulatory control and will be violated as needed.



**BIOLOGICAL EVALUATION FOR SOUTHERN HDs ECOSYSTEM RESTORATION PROJECT DRAFT EA - Bevely Compton**

<b>Page #</b>	<b>Topic</b>	<b>Paragraph</b>	
	6 skid trails, overland access routes	4rd paragraph	All skid trails, overland access routes must be added to the needed master list of soil disturbances and actively revegetated.
	lands	4th paragraph	Landings must be added to the needed master list of soil disturbances and actively revegetated.
	stream debris	5th paragraph	Any debris must be removed immediately, waiting up to 2 days will guarantee that life in the stream is killed.
	Recruitment old growth trees	6th paragraph	Old trees that will become old growth must also be protected.
	Riparian or Wetland	10th paragraph	Provide accurate, ground truth map of all riparian and wetlands in this project area that will be protected. I know where several are in Bull Creek
	Control of weeds	11th paragraph	A master list of all proposed disturbed soil must be created and used in the on-the-ground spraying of noxious weeds. All language that says" "inventoried, monitored and treated as necessary within the project area for a minimum of five years" Is patently wrong, not science but wishful thinking, cutting and pasting of old language from old documents in the hope that the noxious weed epidemic will simply go away. This is not science, it is not addressing this overwhelming problem of noxious weeds having moved deep into the forest and does not force the SJNF to develop new ways of control. This statement completely ignores the SJNF admittance that they have failed at controlling noxious weeds. Once a noxious weed is introduced into a native site one can never remove it completely but only controlled indefinitely. This single issue is why this EA and project SHOULD NOT be done.
	Special status plants and animals	Last paragraph	Providing laymen with identification materials to protect the loss of important plants and animals is not science but hopeful wishing. All field scientists need to be out in the 'FIELD' looking for and protecting what we are fast losing.
Page 7	Knowlton's Catcus	1st paragraph	Protecting this plant which is a bit larger than a penny will be a failure if forest service ground personnel are looking for it while doing their job. Again, expecting a layman to do the work of a field scientist is hopeful wishing and not science. Botanists and other plant scientists need to be on the ground where the disturbances in this plan are happening to do a science based field inventory.
	Undocumented historic property	2nd paragraph	Who will be in the field that would be finding "undocumented historic property" a layman forest service worker with no Archeologist training or the Forest's trained Archeologist. That Archeologist must be on the ground, field inventorying while the disturbance is happening.
	Snags of trees	6th paragraph	All dead standing along with snags must be flagged and protected.

**BIOLOGICAL EVALUATION FOR SOUTHERN HDs ECOSYSTEM RESTORATION PROJECT DRAFT EA - Bevely Compton**

Page #	Topic	Paragraph	
Page 7	When Possible	7th & 8th paragraph	"When possible" has no regulatory control and will be violated as needed.
Page 8	Raptor Nest Northern Goshawk	9th & 10th paragraph	Having layman be responsible for the identification of raptors and their nests is not science. The District biologist must be present, in the field when all disturbances are being done. Lets not lose more birds and bird species because of lack of training.
	Active work locations	1st & 2nd paragraph	States no more than two or 5 active work locations - does that mean 2 or 5 all in the same area? Please provide much more detailed information -will they work locations be spread out over the proposed treatment area or what?
	Peregrine Falcon Eyrie	3rd paragraph	Having layman be responsible for the identification of raptors and their nests is not science. The District biologist must be present, in the field when all disturbances are being done.
	SW Willow Flycatcher Habitat	4th paragraph	Provide map of known, field confirmed map of SW Willow Flycatcher habitat including small localized willow stands. What is the plan to prevent sediment flowing down Bull Creek into the Piedra River where SW Willow Flycatcher habitat has been documented by the USGS?
Page 9	Cross-country and overland vehicular travel	8th paragraph	Provide a map and number of acres cross-country and overland vehicular travel will occur during this project and add the amount of soil disturbance expected to the much needed master list of soil disturbances.
	Chimney Rock National Monument view shed	Not listed	Will the Chimney Rock National Monument watershed be damaged. Please provide detail.
	Bull Creek activities	10th paragraph	Please provide when all of the Bull Creek disturbances will happen including the upper and lower areas of the watershed.
	Roadless areas Prescribed burning	12th paragraph last paragraph	No new temporary overland motorized use cannot happen in the HDs roadless areas. Please add to this sentence and notifying the public of prescribed burning.
	Overland motorized routes	1st paragraph	Provide map of proposed overland routes and add the soil disturbance to the much needed master list of soil disturbances. Rehabilitation may be endless and need to be documented and included here.
Several years	2nd paragraph	A timeline, calendar of what is known now of the work that will be done, when and where must be included in this EA. Something as simple as "year 1 - where, how many acres.	
Prescribed fire & mechanical treatment	4th paragraph	For clarity this paragraph must include the total acres to be burned and mechanically treated. which is 35,761 acres. That's the total disturbance and is critical information.	

**BIOLOGICAL EVALUATION FOR SOUTHERN HDs ECOSYSTEM RESTORATION PROJECT DRAFT EA - Bevely Compton**

Page #	Topic	Paragraph	
Page 9	Riparian areas impacted	chart on bottom	10 acres of riparian areas will be mechanical, prescribed burned or grazed. Complete contradiction to information found on page 41 of the EA that says "riparian corridors would be left intact. It cannot be both. With climate change ALL riparian corridors need to be protected.
Page 10	Wildlife Biologist field visit	1st paragraph	How many acres of the 35,761 acres to be disturbed did the wildlife biologist actually visit? Did he do day and night inventorying. Provide a list of locations, what was seen and most importantly, areas that were not visited. And what does visit mean? Did he do comprehensive inventories of all species or just take a look around? If so, this is not science but wishful thinking that everything that might be in danger has been recorded.
	Formally or informally consulting	2nd paragraph	Science only does formal consulting. Layman do informal consulting. This is the time in the history of the HDs that formal, thorough science consulting must be done so the affects of climate change, a warming environment and less moisture will not have a catastrophic affect on top of all the plant and wildlife that will be lost because of this project. Use science.
	Federal Listed Species	chart	Habitat for the SW Will Flycatcher and the Western yellow-billed cuckoo have been mapped on the HDs or on the Piedra River at the HDs - see above maps. There is a great possible effect if sediment moves down Bull Creek into the Piedra River. There are many conflicting studies as to what Mexican Spotted Owl habitat is and the only way to know for sure if the species is present IS TO GO LOOK FOR IT. Using only those habitat descriptions that are convenient for this project is not science. Species extinction is racing along while no one on the SJNF care enough to go look. Do the job of a field scientist by looking on the land not just 'cutting and pasting' from old documents from the past.
	M. S. Owl surveys		Provide map of actual field surveying of 495,905 acres - no one has walked through all 495,905 acres of land on the HDs. This statement is patently false. Regardless, if no field surveys have been done in the past five years to adjust for the affect of climate change and species moving north to get away from the increased heat, all older surveys are not only meaningless but no longer current science. The time is now, we all are at the tipping point of massive loss of plants and animals due to climate change. The time is now because this is a new project and needs current, now science directing it. Do the work, don't just "cut and paste" science from older documents. The description of "narrow rock walls in a true mixed-conifer describes the pictured cliff sandstone walls in the bottom of Bull Creek. Please field check.
Page 11	SW Will Flycatcher	3rd paragraph	There are a string of cottonwood/willow areas in the Bull Creek creek bed starting where the ATV trail 682 crosses the creek bed and potential more down stream. Have these been field surveyed for this species. The habitat is there.

**BIOLOGICAL EVALUATION FOR SOUTHERN HDs ECOSYSTEM RESTORATION PROJECT DRAFT EA - Bevely Compton**

Page #	Topic	Paragraph	
			Potential SW Willow Flycatcher habitat, as mapped by the USGS occurs on the Piedra River at Bull Creek. What will be done to prevent sediment moving down the creek bed during rain and in the spring destroying this habitat?
Page 11	Western Yellow-billed Cuckoo	4th paragraph	NRCS has mapped potential Western Yellow-billed Cuckoo habitat on the HDs. Have they been field surveyed to determine if the bird is there. If not, doing so need to be done BEFORE any disturbances are done.
	Cumulative Effects	6th paragraph	"No direct or indirect effects on any federally list species" while all these species are declining rapidly and with climate change many will be lost sooner than later. What is the climate science being used to in this study to insure that these species will not be lost simply because no one has looked.
	No habitat	last sentence	No true, because of climate change, habitats are changing. What is the climate science habitats for these federally listed species?
Page 12	No impact	Chart at bottom of page	No impact, affects only individuals of a species. Extinction happens one plant or animal at a time until so many are lost the species is finally eliminated. Fourteen years ago in the NSB CBM EIS the statement "this project will affect individuals but not the species" This same language and lack of species science is used in this EA. Climate science has made it clear that species extinction is happening at a never recorded pace. What is the climate science on species loss in this statement? There is none, it is simply cutting and pasting from older documents and believing that everything is ok. That's not science but wishful thinking. DO THE SCIENCE!
	All individual species descriptions		All language pertaining to the notion of "impacting individuals but not the species" - how can staff at the SJNF believe that all is well on our forest while the entire planet is dying? This entire BE is "head in the sand" thinking. You cannot state that there will be no impacts, only impacting individual anything in every action by the SJNF over the entire forest at the same time, year after year and believe no harm is being done. To think that while the rest of the planet is dying because of climate change is not science but wishful thinking. Climate science and change must be at the forefront of this EA and proposed action. Where is any of the below climate science for SW Colorado factored into the BE and the proposed EA?

## Mountain Studies Institute Website - Durango, CO

### Temperature

- Southwestern Colorado has warmed about 2° F in the last three decades (i.e., 1977 to 2007). This rate of warming is the same as for Western Colorado, but greater than the Western US, or any other region of the US except Alaska.
- Temperatures are likely to increase by an additional 1.5 to 3.5 °F by 2025 and 2.5 to 5.5 °F by 2050.
- Summers are projected to warm more than winters. By 2050, typical average monthly temperatures in the summer are projected to be as warm as or warmer than the hottest 10% of summers from 1950 to 1999.
- The climate of the mountains is projected to migrate upward in elevation and the climate of the Desert Southwest to progress up into the valleys.
- Examples of Potential Impacts:



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- Changes in agricultural crop production and spread of agricultural pests.
- Earlier snowmelt and timing of peak river flows.
- Increased energy usage for heating and cooling.
- Increased heat-related illnesses and spread of disease.
- More amenity-led migration to the mountains from desert communities.

### **Evaporation and Evapotranspiration**

- Due to increased temperatures, the rate at which water is evaporated from water bodies, soil, and vegetation is very likely to increase.
- This will make the environment drier even if precipitation stays the same.
- Examples of Potential Impacts
  - Decrease in streamflow and water stored in reservoirs, especially in hot, dry years.
  - Decreased soil moisture for crops and natural vegetation.
  - Increased irrigation needs or shifts to more drought-resistant crops.
  - Shifts in elevation ranges of plants and animals.
  - Increased wildfire occurrence and forest die-offs.

### Precipitation

- The San Juan Mountain region is difficult to model for precipitation due to complex topography and natural variability in precipitation patterns.
- Projections of change in amounts of precipitation for the region are not in consensus. Some studies indicate that annual precipitation will decrease slightly while others project an increase in the winter.
- Some models project more variable precipitation patterns with more frequent extreme events.



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- Examples of Potential Impacts:
  - Increased storm events and severity.
  - Change in aquatic habitat.

### **Snowpack and Streamflow**

- Warming temperatures are projected to have significant effects on snowpack, timing of snowmelt, and streamflow even without a decrease in precipitation.
  - It is likely that in the future more precipitation will fall as snow, snowpacks will decrease and melt earlier, and peak streamflow will occur earlier in the spring.
  - From 1978 to 2004, snowmelt already shifted about two weeks earlier in Western Colorado. Snowmelt has shifted even earlier in the Pacific Northwest and Northern California, however.
  - Decreases in the amount of water contained in snowpacks are projected to be greater at elevations below 8,200 feet (i.e., a 20 to 60% reduction of snowpack by the period 2040 to 2069). Above 8,200 feet, the snowpack is anticipated to decrease by 10 to 20%.
- 

- Examples of Potential Impacts
  - More flooding in the spring.
  - Reduced water availability in the summer.
  - Shorter seasons for ski/snow and white water recreation industries.
  - Increased summer recreation and tourism opportunities.



***Scientific evidence for warming of the climate system is unequivocal.***

- Intergovernmental Panel on Climate Change