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March 28, 2024

SJCA Comments on the Draft EA for the Junction-Falls Integrated Resource Management (J-FIRM) Project

Dear Noah Daniels,

Thank you for the opportunity to comment on the Junction-Falls Integrated Resource Management (J-FIRM) Project. The San Juan Citizens Alliance is a member based non-profit in the San Juan Basin that advocates for public lands, clean air and water, and abundant wildlife. Many of our members live near, and recreate within, the project area.

Scoping for the J-FIRM Project began in September of 2022. SJCA submitted scoping comments in October, raising several issues. Our primary concerns at the time were potential impacts to wildlife from the proposed downhill mountain biking corridor, expanded winter motorized access and associated parking issues, a lack of specific information regarding spring locations and proposed redevelopments, and the proliferation of trails in the Falls Creek area and potential impacts to cultural resources.

We are pleased that the Forest Service addressed many of these concerns between the scoping period and release of the Draft Environmental Assessment for the J-FIRM project and are grateful for the thorough public outreach the Columbine District has conducted since the initial proposal.

Specifically, we appreciate that the Forest Service segregated the recreation development proposals in the J-FIRM scoping from the restoration proposals that remain in the draft EA. We believe a more comprehensive approach to recreation in the region, as proposed in the upcoming Durango Northwest planning effort, will better serve the community and ensure time for thorough public participation, while still allowing the Forest Service to prepare for and implement prescribed fire, rehabilitate the Junction Creek streambank, improve springs throughout the project area, improve wildlife habitat, protect cultural resources, and ensure the safety of residents in the Wildland Urban Interface.

We are also pleased to see that the helicopter thinning along the private land boundary in Falls Creek proposed in scoping, and extended irrigation from Steineger Ditch to the historic apple orchard in Hidden Valley, were eliminated from further consideration. We agree these actions would incur undue costs and impacts relative to their benefits.

Since scoping, the Columbine District has worked closely with the Four Rivers Resilient Forest Collaborative (4Rivers), a local stakeholder group organized through the Southwest Colorado Collaborative Forest Landscape Restoration Program, to identify values in the District that could be



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enhanced through management actions and to air concerns about impacts to public resources. We appreciate the Forest Service's engagement with the collaborative and incorporation of these values into the planning effort.

The Draft EA references specific Forest Plan components that would be achieved through the project. Thank you for being explicit about how the project implements the Forest Plan. We suggest that the EA could also incorporate Desired Future Conditions articulated by the SW CO CFLRP, drawing a clear connection between collaborative restoration goals and the project. We hope that J-FIRM can serve as a model for future projects in this way and help clarify the types of projects that may be eligible for CFLRP funding.

The EA also seats the J-FIRM project within the four values outlined in the Rocky Mountain Restoration Initiative (communities, clean water, forest and wildlife, and recreation). RMRI is described in the EA, like the 4Rivers Collaborative, as a "partner group". After reviewing RMRI materials online and participating in the CFLRP collaboratives, we remain unclear about how RMRI operates in the context of project development and implementation. While we generally support the RMRI values, we ask for more transparency about RMRI and how it dovetails with Forest Service planning and the CFLRP. This will be particularly important as the Forest Service begins the larger recreation planning effort anticipated in Durango Northwest.

I. Project Wide Considerations

SJCA supports the Forest Service's efforts to return fire to the landscape through broadcast prescribed fire and pile burning across the project area. We are also pleased to see that the vegetation thinning prescriptions are narrowly tailored to specific geographic areas, focus on hand thinning of small diameter trees where practicable, incorporate protections for wildlife, and protect ecologically important features like wet meadows and snag habitats.

As we addressed in our scoping comments, given the complexity of this landscape and the increased recreation demand, we believe the project area (and the larger geography that will be considered in the upcoming Durango Northwest plan) is no longer appropriate for its MA5 suitable timber designation in the Forest Plan. We recommend a Forest Plan Amendment be enacted to remove this landscape from the suitable timber base, which will better align the plan with the current and projected uses of this landscape.

Colorado Parks and Wildlife is an important partner in J-FIRM, as the project overlaps Critical Winter Range, Severe Winter Range, and Winter Concentration Areas for big game, and shares habitat connectivity with Perins Peak State Wildlife Area. Thank you for working closely with CPW through a formal Cooperative Working Agreement to manage habitat in the project area. We hope the Forest Service will continue to work alongside CPW in future projects to avoid, minimize, and mitigate disturbance and habitat fragmentation.



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CPW is currently developing a Statewide Habitat Connectivity and Conservation Plan which we hope to see incorporated into future projects along with guidance from Trails with Wildlife in Mind. We also hope to see recreation data from the fledgling Southwest Colorado Conservation Outdoor Recreation Roundtable inform projects like Durango Northwest.

II. Junction Creek Road/Logchutes Upland

Our scoping comments requested more specificity around spring locations and proposed redevelopments. Thank you for completing a field inventory and providing a map of springs within the project area as well as a table detailing their condition and proposed actions.

We support the Forest Service's goal of repairing, redesigning, or removing historic water developments within the vacated grazing allotment to serve the ecosystem, wildlife, and the public. We ask that the Forest Service use the minimum heavy equipment necessary in spring redevelopment and be judicious with herbicides when controlling for invasives – targeting herbicides to the species and timing application optimally.

III. Colorado Trail/Junction Creek Riparian Corridor

We are generally supportive of the Forest Service's plans to rehabilitate and stabilize the streambank along Junction Creek. We agree that user-made access points have proliferated and contributed to streambank erosion. The EA describes several methods of rehabilitation including bank armoring, slope stabilization, vegetation re-establishment, and other site-specific best management practices. We ask, as the Forest Service makes site specific implementation decisions on streambank stabilization and access points, that staff continue to communicate with the 4Rivers collaborative and potentially host a site visit to discuss best practices and proposed actions.

While we recognize the need for site specific streambank rehabilitation along Junction Creek, we hope to see issues like erosion, sedimentation, and incised channels addressed systemically long term. We generally propose low tech solutions like process-based restoration to help reduce those issues, regulate flow, improve groundwater recharge, and reduce fire risk. We hope to continue discussing these options with the Forest Service and the 4Rivers collaborative, helping to identify and mitigate the causes of stream degradation while J-FIRM addresses some of the symptoms.

IV. Falls Creek/Hidden Valley

We are excited for the potential to restore 190 acres of native and other desirable plant species in the Falls Creek Valley to support big game and other wildlife habitat. We appreciate the Forest Service's coordination with CPW and consultation with Tribes as it implements the reseeded effort. We also support the precautions that the Forest Service is taking by avoiding wetlands, riparian areas and exiting native vegetation, and the use of test plots to evaluate efficacy.



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Thank you also for your work to protect cultural resources in consultation with culturally affiliated Tribes, and for conducting cultural resource inventories and implementing design features per the NHPA programmatic agreement with SHPO. We support the reduction of high fuel loads near cultural resources. We understand that dispersed social trails in Falls Creek also pose a risk to archaeological resources and ask that the Forest Service consolidate and define the trail system in consultation with Tribes. We also support authorization of an emergency egress route for the Falls Creek Ranch and High Meadows subdivision and continued partnerships with La Plata County COSWAP to identify and reduce fire risk in the WUI.

V. Conclusion

Thank you for your work on the J-FIRM Draft EA. The Forest Service has committed to thorough public process since the project's initial proposal – responding substantively to issues raised in scoping comments, homing in on a few manageable issues while separating out recreation to the Durango Northwest project, working with the 4Rivers Collaborative to identify shared values and concerns, consulting with affected Tribes, and holding an open house for the Falls Creek community. Stakeholders had ample time to review the proposal and voice their perspectives.

We hope this approach will continue for future projects, reducing conflicts and expanding funding opportunities for programs like CFLRP. We look forward to continued engagement on this project and upcoming planning efforts on the landscape.

Sincerely,

John Rader
Public Lands Program Manager
San Juan Citizens Alliance