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Comments: Thank you for the opportunity to comment on the Salter EA.

I think I oppose this project but must admit that the poor description of the proposed action and the effects analysis make it difficult to tell. Ponderosa Pine management in the Salter area is a good idea. But the confusing nature of this EA and the problems with the Chicken Creek project reduces my trust in the SJNF. The NEPA document seems to harken back to the decades of the 80s and 90s when public land agencies treated NEPA as an annoying federal regulation. The results of those NEPA documents tended to hide the scope of projects and find no impacts as a result of the intended project. Boxes were checked that paved the way for industry to move in and do the work. Such an approach however usually landed the FS/BLM in court with everyone fighting with everyone else.

Some of my concerns and questions are:

1. What is the status of ponderosa pine and beetle kill? How will this project specifically help with mitigating beetle kill? How will it specifically increase the health of the forest? What science has been used to apply best logging practices to improve the health of the forest? What research is available on how to best mitigate the impacts of the roundheaded pine beetle? The EA seems to rely heavily on Negron 2008. Is there more research available?
2. What is the exact impact of the project on the recreational uses of Boggy Draw? What trails will be closed and when? How fast will trucks be going? What are the possible impacts to public safety? What if children, dogs, cows, or even adults are wounded or killed as a result of recreational/industrial interface? What about dust? Why aren't there buffer zones to the trails in this important recreational area?
3. What is the economic impact to the town of Dolores in relation to the disruption of recreational activities on the area?
- 4.

In specific terms of the Forest plan:

[bull] How does this project maintain or improve ecosystem function?

- * How does this project add to the resilience, and sustainability of the ecosystem?
- * How does this project provide economic or social support to local communities?
- * How does this project ensure current and future needs for Native American tribal use, including that associated with special forest products (for example, teepee poles)?
- * How does this project support innovation in utilization, including conversion of cut-tree mass into biofuels, pellets, biochar, or other useful products?
- * How does this project efficiently balance or reduce costs of implementation of treatment activities?
- * How does this project anticipate climate-related plant succession changes?

1. How much brush will be removed over the project area? Will it be like Chicken creek where most of the oak was removed?
2. What about clumps and openings? Will the treatment resemble the park like status of Chicken Creek where there are neither clumps nor openings? Or will it be like the Chucky Bear Clear cut which is a mess of unimaginable proportion? How does this project differ from those two areas?
3. Where, when, and why will be reforestation done?
4. Where is the monitoring data for Abert squirrels for the Dolores District? Is the population stable throughout the

San Juan or does vary from district to district? Isn't clumpiness important for Abert squirrels? Why isn't this addressed in the direct and indirect impacts?

5. What is the trend data for deer and elk? How will the proposed action help these species?

6. What is the trend data for goshawks? How will the proposed action help these species?

7. Why are Merriam's turkey not mentioned?

8. What is the trend data for Hairy Woodpecker? How will this have proposed project effect populations? Why have bird surveys not been conducted? I can assure you that Hairy and Downy Woodpeckers and Olive Sided Flycatchers are present in the project area. Why do you assume that they even are not present?

9. How will you mitigate the impact on nesting birds and violations of the Migratory Bird Treaty Act?

10. Why doesn't this project discuss the relationship with climate change and carbon balance?

Thank you for your interest in my comments,