Data Submitted (UTC 11): 3/11/2021 11:00:00 AM
First name: Adrian
Last name: Archuleta
Organization: Colorado Parks and Wildlife
Title: Area Wildlife Manager
Comments: RE: Salter Vegetation Management Project Environmental Assessment

Dear Mr. Padilla,

Colorado Parks and Wildlife (CPW) appreciates the opportunity to review and provide further comments on the proposed Salter Vegetation Management Project Environmental Assessment within the San Juan National Forest. CPW provided scoping comments on this project on March 27, 2020. The project proposes using a variety of mechanical vegetation thinning, timber harvest, and would potentially use fire on the project area to achieve a suite of vegetation goals on the approximately 22,346 acres of the treatment area. Most of the goals are interrelated and strive to create a healthier, more natural forest, thereby benefitting many forest users, including wildlife. Additionally, the project will require the construction of temporary roads as well as use of roads currently listed as Maintenance Level 1 Roads.

The project area encompasses a variety of ecosystem types, including ponderosa/Gambel oak forest, stands of aspen, and stands of mixed conifer. These different forest types are generally lacking a diversity of tree size and age, which makes them more susceptible to dwarf mistletoe and many different bark beetles. The project area provides habitat for a multitude of wildlife species including elk, mule deer, black bear, mountain lion, coyote, fox, bobcat, and Merriam's turkey, dusky grouse, Cooper's hawk, red - tailed hawk, sharp - shinned hawk, northern goshawk and many other species. The area contains valuable fawning and calving grounds for deer and elk, as well as critical winter range for these same species. The area also provides nesting habitat for a suite of both migratory and non-migratory birds. CPW appreciates the potential wildlife habitat improvements and benefit that this project could provide.

Big Game

The analysis area contains and is adjacent to elk calving grounds. The Environmental Assessment specifies that there will be no operations done in areas that CPW has mapped as elk production areas from May 15th to June 30th annually. The Environmental Assessment also specifies that operations will not be done in CPW mapped critical elk winter range from December 1st to April 30th annually without line officer approval. CPW understands that travel

may be necessary through mapped production areas to access non-production areas, and appreciates that we will be consulted about such travel.

Logging operations in the area will remove overstory and should promote growth of native grass, forbs, and shrubs in the treatment area as well as regeneration of trees. This will encourage use by big game. Live stands of trees and corridors to stands of trees outside of the treatment area should be maintained. These trees provide important hiding and thermal cover near what will become an attractive foraging area. Please include design features for project implementation that will ensure treatment areas will provide security and thermal cover for big game.

Prescribed burns within the project area should be planned to attempt to provide a mosaic of habitat for wildlife. Smaller, patchy fires that maintain pockets of cover and shelter will provide the greatest benefit to both big and small game.

Travel Management

Increased road density can impact the use and occurrence of many wildlife species. Vegetation management, and recreation management can impact effective use of habitat by mule deer, elk, and other species. CPW is supportive of this project's proposed travel management that aligns with the long-term goal of preserving blocks of unfragmented wildlife habitat. These blocks help hold big game on public lands where they are available for harvest by public land hunters. Maintaining or reducing road density will provide more usable habitat for wildlife within the treatment area, and will help protect crucial migration corridors between large blocks of habitat.

CPW recognizes that approximately 50 to 75 miles of temporary roads may be constructed for this project. We understand that enforcing public restrictions on these roads is difficult and so ask that any roads constructed for this project be physically blocked and signed when not in use for project actions. That would help deter public use and keep areas as undisturbed as possible for wildlife use. CPW understands that the EA states that the following use for harvest and treatment implementation, both temporary AND designed roads would be decommissioned and CPW supports this.

Raptors

The Environmental Assessment states that surveys to locate raptor nests (specifically of northern goshawks) will be completed prior to the project start. If any goshawk nests are found, all operations will be restricted within one-half mile of the active nest from March 1st to August 31st annually. The same restrictions will be applied to nests of other raptors, except with a one-quarter mile buffer instead of one-half. The level of disturbance that a raptor might experience from this project's operations at those distances will vary with individual raptors, but CPW appreciates these restrictions.

Aquatic Species

The project area encompasses several smaller drainages that do not directly support fish, but that drain into McPhee Reservoir which is a destination for trout fishing, as well as small/ largemouth bass, and supports other fish species including kokanee salmon, crappie, and perch. Colorado Parks and Wildlife's primary concern regarding aquatic species is to maintain water quality by limiting erosion and sedimentation into streams. Water quality can be maintained by minimizing

drainage crossings and surface-disturbing construction activities near these resources. The Environmental Assessment states that temporary roads will be constructed, used, and reclaimed when erosion potential is low. The Watershed/Soils section on pages 63 and 64 lists several features of the plan designed to reduce erosion, including distribution of logging throughout cutting units, and avoiding actions that might disturb soil during periods of wet soil. CPW agrees with these actions and appreciates the effort to preserve water quality.

Non-native Invasive Weeds

CPW views one of the biggest threats to ecosystem health on federal lands in this area as non-native invasive weeds. Many invasive weeds can already be found throughout the project area. Invasive weeds generally flourish following disturbance. The Rare Plants and Invasive Species section on page 22 lists six actions to prevent the spread of invasive plant species. CPW agrees with all six of these actions.

Conclusion

Colorado Parks and Wildlife supports this project since it will improve the health of the forest in the treatment area. We recognize that short term impacts to wildlife may occur from the construction and use of roads, as well as the mechanical and human disturbance during vegetation thinning. However, we believe that the improved wildlife habitat offsets these impacts in the long run.

Thank you for the opportunity to comment on the Salter Vegetation Management project. If you have any questions concerning these comments, please feel free to contact District Wildlife Manager, Matt Sturdevant at (970) 749-1435. We are glad to continue working with you for the benefit of wildlife. Please let us know if you would like to discuss any of our comments or recommendations for this project.

Sincerely,

Matt Sturdevant

District Wildlife Manager