

Data Submitted (UTC 11): 3/12/2021 11:00:00 AM
First name: James
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Organization: Montezuma County
Title: Natural Resources Director
Comments: RE; Salter Vegetation Management - 2410

Dear Mr. Padilla,

The Montezuma County Board of County Commissioners would like to provide the following input regarding the Salter Y Vegetation Management proposal.

Montezuma County would like to state that we are generally in agreement with the overall purpose and need for action. We further approve of the three main project desired outcomes stated in the scoping letter;

- 1.) Improving and maintaining the resistance and resiliency of ponderosa pine forest ecosystems to increase protection against epidemic insect and disease outbreaks.
- 2.) Increase the structural diversity of ponderosa pine forest represented across the landscape.
- 3.) The need to provide economic support to local communities by providing timber products to timber dependent local industries in a sustainable manner.

The Project is consistent with the intent of the Montezuma County Comprehensive Land Use Plan. The Project is also consistent with the 2013 Forest Plan. The project area is located on suitable timber lands within Management Area 5. Management Area 5 emphasizes active management and commodity production in order to meet multiple use goals.

Timber harvest has occurred across the entire project area in the past and the terrain is largely suitable, and accessible for commercial timber sales. We also agree that there is substantial high value infrastructure across the landscape that would benefit from landscape level treatment as proposed by this project.

The Boggy Draw block attracts some of the highest visitor use in the area. It is highly valued for its scenery, recreational opportunities, air quality, cultural resources; and it contains numerous and substantial infrastructure values that are at risk. We realize that there will be impacts to all of the resources in the project area and that some of them will be negative for a short time. However the long term benefits to all resources will out-weigh the short term inconveniences.

Montezuma County has reviewed the recommendations made by the Southwest Colorado Cycling Association (SWCCA) which include some sound, common-sense mitigation measures that we feel the USFS should carefully consider.

McPhee Reservoir and the protection of the waterways that flow into the reservoir is also a top priority. We believe active forest management on upper watersheds, which include components of commercial timber production, service contract forestry, prescribed fire, and we would like to add grazing are the best opportunities we have to use the tools at our disposal to mitigate, slow and adapt to the effects of climate change.

High value infrastructure and resources have been identified, and analyzed, through the Dolores Watershed and Resilient Forest Collaborative, which provided a transparent opportunity for local government, public, academic, and industry input. The proposed action is consistent with the objectives of the Rocky Mountain

Restoration Initiative (RMRI) and the Colorado Collaborative Forest Landscape Restoration (CFLRP) Program objectives and will work in concert with those programs.

The baseline conditions of the Salter Y area include a great deal of dense overstocked even aged ponderosa intermingled with dense, small oak shrub. We agree that dense, over-stocked, even-age, closed canopy ponderosa pine stands are more susceptible to insect outbreaks, and uncharacteristic stand replacing fire events. It is also pretty clear that the lack of structural diversity across the Salter landscape is correlated to a reduction in forest resiliency and consequently, long term resistance to landscape level disturbance events.

In general Montezuma County supports the proposed action in-part; to address insect infestations, and reduce the risk of wildfire to protect public safety, health, and welfare. However we also support the proposals intention to manage the overall forest health by moving it towards an uneven aged, open canopy forest. We believe the benefits will include better wildlife habitat and forage, better livestock forage and improved range conditions, increased watershed yields for McPhee Reservoir, and more consistent, abundant and valuable forestry products for commercial use.

Our vision for ongoing forest management includes a viable, and sustainable commercial timber industry, working in conjunction with low intensity fires used as regular and ongoing maintenance activity across the San Juan National Forest.

With regards to roads, we understand the road strategy, timing and Best Management Practices being proposed to mitigate negative effects of the proposed action. We support mid-winter harvest as much as possible because it reduces the conflicts with most other forest recreational users, reduces erosion and greatly reduces impacts on wildlife.

We support the use of temporary roads and recommend the use of natural materials such as boulders and large trees when closures are necessary. We see no credible threats surrounding potential increase of off road use. All motorized use is already limited to "open" roads, therefore further cumulative environmental impacts have already been greatly reduced. Roads that are newly created or pulled out of storage should be rehabilitated as soon as practicable after harvest operations are complete. Effective weed control is a must across the entire forest and commercial timber operations should be a priority for prevention and abatement. Cumulative impacts may be positive for this project if rehabilitation is creative and promptly completed.

Montezuma County has coordinated with the Town of Dolores on concerns that the Town has with the proposed project. The County will work with the Town to address any maintenance issues that arise on North 11th Street due to the proposed project. The County is prepared to handle any increased maintenance on Road 31.

Montezuma County is working with the Southwest Cycling Association, and the Town of Dolores to create an alternative pedestrian route adjacent to County Road 31 which will help to improve safety concerns from the Town of Dolores to the Forest Service boundary.

Montezuma County shares the concerns of the business community that this proposed action can have a negative effect and create an economic loss for recreation businesses who rely on access to the Boggy Draw Landscape. We request that the USFS do its best to minimize economic impacts to recreation based business, however we place top priority on forest health. The potential for catastrophic wildfire far outweighs the possible economic loss from recreation due to treatment.

Damage to important infrastructure like trails could be devastating from a large wildfire. Activities such as dispersed camping could become nearly none-existent. The overall user experience could be degraded to the point that some people may be turned away completely. Furthermore recovery from a wildfire can take years, if not decades, which would make the economic loss even more unbearable.

We believe that a healthy forest is key to a healthy recreational economy. If the Boggy Draw landscape is overrun by a catastrophic wildfire, the economic cost to everyone in the county will be profound. While we hope that the project can be managed to minimize economic losses, some of the risk management will necessarily have to be left up to the private business. One way to mitigate this potential loss is for private business to promote other areas of the forest that are not being treated. We feel confident that the USFS is willing, and can help to direct users to alternative areas, but we need recreational based business to self-advocate as well.

Montezuma County would like to stress that our vision includes a permanent, and sustainable, commercial harvest component. We agree that we are trying to achieve a healthy, resilient forest that is resistant to disease, insect and wildfire outbreaks. However that does not mean that we envision some sort hands-off pre-Columbian forest condition. Rather, we envision a forest that is sustained by our communities in a "hands on" managed forest scenario.

In-turn we will have a forest that sustains our communities through abundant and accessible forest and mineral products, clean and abundant water, clean air, healthy rangelands, and a wide array of recreational opportunities for all Americans.

The long term results of this proposed action will help to achieve a forest that ecologically functions at a high level, while yielding many other positive benefits that helps sustain the safety, health, and welfare of adjacent rural communities.

Thank you for this opportunity to comment.