



# Intermountain Forest Association

445 Milford Street Salida, CO 81201  
928-521-9476

March 12, 2021

Mr. Derek Padilla, District Ranger  
Dolores Ranger District  
San Juan National Forest  
29211 Highway 184  
Dolores, CO 81323

SUBJECT: Salter Vegetation Management Project

Submitted via: <https://cara.ecosystem-management.org/Public//CommentInput?Project=57671>

Dear Mr. Padilla:

Intermountain Forest Association (IFA) is a member-based organization that advocates for healthy forests and healthy communities, including actively promoting sound forest management that provides a stable and sustainable supply of timber from public and private forestlands. Given that several of IFA's members heavily rely on timber output from the San Juan National Forest and have made substantial investments to help facilitate treatments, we are excited about the proposed Salter Vegetation Management project on the Dolores District. On behalf of the members of the Intermountain Forest Association, I appreciate this opportunity to offer comments on draft environmental assessment.

Overall, we are very supportive of the San Juan National Forest being proactive in responding to the on-going beetle epidemic that is impacting pine stands within the project area. Not only does the project address the recent mortality, it also address the surrounding stands with the goal of making them more resilient and effective in fighting off future beetle attacks. We are also very supportive of your initiative to actively increase age class diversity and structural diversity within the project area. As our forests face increased pressures from climate change, it will be crucial to have forests that are more resilient. Therefore, we concur with the Purpose and Need as discussed on pages 9-12. We concur with and strongly support Alternative 2 (the Proposed Action) as written on pages

12-16, with the caveat that our comments below are considered and incorporated into the selected alternative.

Given the fact that all units proposed for treatment are located within Management Area 5, we support the Proposed Action (Alternative 2) that allows cutting of trees up to 26.9" dbh. We feel strongly that Alternative 3, with a diameter cap of 20" will not achieve the desired goals and objectives and will put stands at risk from insects and disease and catastrophic wildfire. Furthermore, it will limit flexibility in creating the necessary habitat for wildlife.

## **Project Design Features**

### **Fuels**

- We disagree with the Fuels #6 that requires all activity fuels be lopped and scattered at an average depth less than one foot. We find this requirement to be economically non-feasible and recommend you change to 2 feet.

### **Rare Plants and Invasive Species**

- We disagree with Rare Plants #1 that limits each burn pile to ¼ acre or less. This is overly restrictive and could be hard to implement. We recommend adding language that states, "unless agreed upon in writing."
- We feel that Rare Plants #6 needs additional clarification regarding the term "increasing in infestation size." We would also like additional information regarding onsite weed decontamination stations.

### **Recreation and Public Safety**

- We feel it is important to include the purchaser during the implementation checklist process. Therefore, we ask that under Recreation and Public Safety #2a, language be added that states landings and slash piles would be identified during the implementation checklist process in coordination with the purchaser.

### **Scenery**

- It is not always necessary to seed areas that have been disturbed and given the expense of seed, we request that you add "as needed" to Scenery #5.

### **Timber**

- Given the overlap between standard operating seasons and timing restrictions for wildlife and recreation, we request the final EA have a graph/chart that outlines the various treatment blocks and the times available for work during a 12-month period.

## **Environmental Effects**

### **Recreation Activities and Experience**

- See note above regarding Timber. We believe a chart that shows when work can occur in a treatment block will help reduce the level of concern regarding impacts to

recreation. It would also be helpful to include contract information that explains the process of requiring completion and closing of one block prior to starting another.

**Transportation**

- Again, further detail and description regarding average length and size of contracts, operating seasons, and typical rates of production would be helpful to better understand the impacts.

**Vegetation**

- We request additional information regarding current conditions be included within this section.

We appreciate your consideration of these comments and suggestions as you move forward with the planning of the Salter Vegetation Management Project. I would be happy to discuss these comments if you have any questions.

Sincerely,

*Molly Pitts*

Molly Pitts  
Intermountain Forest Association  
Colorado Programs Manger