

**CENTER FOR BIOLOGICAL DIVERSITY  
COLORADO NATIVE PLANT SOCIETY  
DEFENDERS OF WILDLIFE  
ECOFLIGHT  
GRAND JUNCTION AREA BROADBAND, GREAT OLD BROADS FOR WILDERNESS  
NORTHERN SAN JUAN CHAPTER, GREAT OLD BROADS FOR WILDERNESS  
SOUTH SAN JUAN BROADBAND, GREAT OLD BROADS FOR WILDERNESS  
HIGH COUNTRY CONSERVATION ADVOCATES  
SAN JUAN CITIZENS ALLIANCE**

March 12, 2021

Derek Padilla, District Ranger  
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Via email: [kara.chadwick@usda.gov](mailto:kara.chadwick@usda.gov); [derek.padilla@usda.gov](mailto:derek.padilla@usda.gov)

Via web portal: <https://cara.ecosystem-management.org/Public//CommentInput?Project=57671>

**Re: San Juan National Forest Should Protect Large Trees in the Salter Project Area**

Dear Supervisor Chadwick and Ranger Padilla:

Due to massive logging of ponderosa pine in southwestern Colorado over the last century, large, old trees are a relative rarity on the San Juan National Forest. These trees provide habitat for a variety of wildlife, are often the most resistant to wildfire, and due to their survival through recent droughts and insect epidemics may provide a valuable seed source for forest resilience and recovery in a time of climate change. Large trees are also champions of carbon storage at a time when the new administration is focused on combating climate pollution. Though the Forest provides protections to old-growth ponderosa in some specific zones on the forest, there is also the need to preserve large and old ponderosa trees and groves *across* the Forest across the full range of Management Areas.

Large and old ponderosa pine are valuable socially as awe-inspiring giants and as sources of shade for recreationists, and especially valued in areas around Dolores, where increasing numbers of mountain bikers, hikers, and others enjoy the Forest, and where the local economy is increasingly built around enjoying the forest. Scientific research and years of collaboration in northern Arizona national forests have proven the wisdom of protecting large ponderosa pine.

We are therefore gravely concerned with the likelihood that the Forest Service will adopt Alternative 2 proposed for the Salter Vegetation Management Project. That alternative would authorize the commercial logging of trees over 20 inches in diameter at breast height (dbh), including trees up to 26.9" dbh, or more than 7 feet in circumference. The San Juan National Forest's draft environmental assessment admits that the Salter project area contains very few large trees, and concludes that there are almost no benefits from logging trees up to 26.9" dbh when compared to logging no trees over 20" dbh. In fact, the draft EA acknowledges that

logging larger trees will provide no additional benefits in terms of reducing fuel or potential fire loading. Further, logging larger trees contradicts the conclusions of the science-based Ponderosa Pine Partnership that sought to restore the San Juan's forests to more historic conditions through management practices in the 1990's.

The environmental, economic, and social case for protecting large trees is well-established, and outweighs the primary "benefit" of logging such trees: profits for mill owners. We believe that the management objectives and desired conditions defined in the 2013 San Juan National Forest Plan can only be met by **not** harvesting large and old ponderosas, making the draft EA's proposed action not only unwise but potentially illegal. We urge the San Juan National Forest not to adopt an alternative that authorizes the logging of large trees, such as Alternative 2, and to instead insure that trees over 20" dbh trees are left standing.

Thank you for the opportunity to comment.

Sincerely,

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