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Objection Reviewing Officer
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Posted to: <https://cara.ecosystem-management.org/Public/CommentInput?Project=57671>

RE: Objection (36 C.F.R. § 218.8)to the Draft Decision to the Salter Vegetation Management Environmental Assessment (Dolores District - #57671)

Objection Reviewing Officer and San Juan National Forest Staff,

This letter serves as San Juan Citizens Alliance (SJCA) Objection to the Final Environmental Assessment with Finding of No Significant Impact carried by the Draft Decision Notice for the Salter Vegetation Management Environmental Assessment. I am the Lead Objector for SJCA.

Our Objections and associated comments represent the concerns and recommendations of the San Juan Citizens Alliance's staff and board, our 1,000+ members, an additional 5,000 supporters, and members of the public including residents of Southwest Colorado and public land owners and users across the United States who are committed to scientifically based and legal stewardship of our national forest lands.

Introduction to Objection

We submit this Objection to the Salter Environmental Assessment (EA) Draft Decision with great disappointment that the San Juan National Forest has been unable to design and implement a NEPA process that is successful in gathering the necessary resource-related data, latest relevant scientific research findings and stakeholder inputs which when collated and

balanced should be able to produce a Draft Decision that adequately meets the ecologic, social and economic objectives across the Salter landscape. SJCA fully engaged the Salter NEPA process from the start with the aim of avoiding the need to submit an Objection. Indeed, SJCA was hopeful that with an adequate NEPA process woven together from the Dolores Watershed and Resilience Forest Collaborative's initiatives, on-the-ground tours, the dissemination of various scientific findings, "side conversations" and other efforts would result in no Objections to the Draft Decision being submitted. Perhaps we were naïve in our "no-Objection" hopes, but we are deeply discouraged that there are many Objections submitted representing numerous points of view on the design and proposed implementation aspects of the Salter project. We believe this is an indication that the Draft Decision is significantly flawed rather than it being an endpoint that is sometimes opined as "no one fully like the decision so it must be well balanced."

SJCA and many other entities and individuals submitted comments during the scoping and draft EA periods that we believe, if examined and reviewed carefully, "pointed the way" to a scientifically-based Draft Decision that would support the agency's "three-legged" stool of objectives. While we have not systematically reviewed all of the scoping comments received by the District to determine if issues brought forth had been addressed in the draft EA, we do know (as we will detail below) that many if not most of our suggestions per issues to address in the NEPA process were ignored and through a cursory review we know this to be true for other scoping commenters. We must ask, was the Dolores District truly earnest with an interest to gather ideas from the diversity of the community to help build a viable, balanced and durable Draft Decision? Unfortunately, our conclusion to this question has been "no", and because the District from the outset of scoping pursued a seemingly predetermined path we have collectively before us an inadequate Draft Decision that is deficient with huge components of necessary information on which any decision of worthy would be predicated. We certainly don't have the "keys to the lock" to understand why this approach was taken, but the District's approach has led to a slowed process, a lack of trust that all stakeholder input will seriously be considered, and of course to the need to engage an Objection process and perhaps subsequent litigation.

As detailed below, our Objection (and the specific objection points within) is predicated on both the NEPA process and the aspects of the resulting decision. Paramount is the reality that because the District refused to provide critical information that was requested during the scoping process and/or was elemental to the design and alternatives of a Salter area project, there was an inadequacy of information and the subsequent forming of Alternatives which rendered the Draft EA to be a document with a narrow focus. We emphasize that the NEPA process was significantly flawed and that an Objection resolution process that attempts to "jump over" the process aspect of the shortcomings of the Salter promise would be profoundly "missing the point."

1. Inadequacy of the Purpose and Need Statement (PNS)

As written in the February 2020 scoping package, “The purpose and need for this project is derived from the differences between the existing forest vegetation conditions and the desired forest vegetation conditions, as defined by the SJNF LRMP.” While we understand that this project is focused on MA-5 lands and within the suitable timber base, we believe the overly narrow focus of the PNS is foundational to the shortcomings of this NEPA process and the Draft Decision. While the scoping document mentions (very briefly) other values and resources within the Salter landscape, the PNS fails to recognize such and therefore their relative importance is minimized in the process and decision. The PNS fails to articulate, and therefore lacks in providing the necessary goal and guidance these MA-5 and suitable base for timber lands are also lands utilized by grazers, hunters, the full array of recreationists (campers, bikers, hikers, equestrians, etc.), firewood cutters, and others as well as being important for watershed/water users interests. Despite the diverse use of this landscape the PNS statement is so narrow that it negates the inherent multiple use foundation of this region, the “backporch” to Dolores and nearby residents. Perhaps the Dolores District was hoping to address these other resource and user interests through the Interdisciplinary Team (IDT) involvement, however, to anoint the IDT with this work without a clear set of resource objectives has shown not be a successful approach.

The design and application of this narrowly focused PNS has not served the Dolores District well as the resulting process and Draft Decision are commensurately narrow which we believe is a central reason as to why the District received the voluminous number of comments of concern on the EA and undoubtedly the array of Objections, too. In our scoping comments (Appendix A) we specifically call out the need to broaden the PNS and obviously our suggestions were ignored. We reiterate here in our Objection that the PNS should have included, which we believe would have resulted in a more balanced and accepted Draft Decision, language that would have at least acknowledged the other resources on this landscape and its multiple use standing. As is, the PNS went forward as originally crafted and gave rise to the opinion I have heard from many that “this just looks like a logging project.” Well, maybe it is and the entire EA is an attempt at a showpiece that it is not, but if the Salter project is truly intended to be more than a “logging project” than an appropriate PNS is a missing keystone to that aim. Even from a “marketing perspective” the Dolores District would have been smart to include something per the importance of wildfire mitigation in the PNS, but no, that opportunity was also missed.

We do note that the Final EA includes three bullets under the Purpose and Need (Section 1) below “Introduction” (page 1) that represents a broader concept of the project’s evident objectives. The text, however, does not indicate that this is an updated Purpose and Need Statement and therefore without such a specific declaration of this being a revised PNS we are operating with the understanding that the PNS shared with the public in the scoping package is still the “official/NEPA” PNS.

Suggested Remedy

Because the PNS is the foundational statement to a NEPA process the errant and incomplete PNS of the Salter NEPA process “got out to a bad start.” With a big lift and a well communicated fresh start, the Dolores District could perhaps begin again with perhaps a coalesced combination of the scoping process and the draft EA element with a broader and more inclusive PNS that reflects the multiple use nature of the Salter. This would only be possible if the Alternatives and design features that were spawned by a PNS would adequately reflect a changed PNS. Otherwise we would recommend a full fresh start at the scoping phase with a more diverse and extensive PNS.

2. Lack of Response to Scoping Comments

The Dolores District is required to respond to substantive issues raised in scoping comments received from the public and stakeholders. Despite this requirement, there was a failure to address four of the substantive issues we submitted in our scoping comments that we recommended be included (see Appx. A – SJCA Scoping Comments):

- We recommended the “Presentation of Possible Management Actions and Development of NEPA Alternatives” which included the concept of exploring and presenting a diversity of specific project design and implementation. Instead, the Draft EA minimizes the need to explore Alternatives and only presents one action Alternative in detail, the Proposed Action (Alternative 2).
 - The inclusion of the Common Stand Exam (CSE) data in a “layperson-friendly” form - the term “common stand exam” is only mentioned once in the entire Draft EA (page 11) despite the entire project is predicated on the current condition that is evidently derived from the CSE.
 - The inclusion of economic information and associated analysis regarding “varying actions that could potentially be elements of the project.” While there is some text within the regarding the forest products industry benefits there are no dollar-figure specifics as we asked for that would give the public an understanding of various possible revenue streams along with costs associated with the project. For a project with significant economically important aspects from various points of view the economics related context is sorely lacking.
 - Climate change is minimally addressed in the Draft EA despite scoping comment recommendations that both Salter site and larger scale specific information regarding critical climate-related information should be determined and analyzed. The carbon cycle/sequestration is minimally covered and is devoid of any metrics regarding the carbon balance of this proposed project. The climate/carbon component within the Salter NEPA is reminiscent of a NEPA process from the previous century rather than 2021.
- A. Within our scoping comments “ We recommend that the EA provide an array and diversity of possible actions and tools that could be combined to best meet the desired conditions as relevant to the varying conditions on the ground. Providing only a Proposed Action and a No Action Alternative is an insufficient approach to detailing and sharing with the public a diversity of actions that could be utilized for the project as we had requested be enumerated. Rather than attempting to wrap any subset of these possible actions into one or two alternatives, we recommend detailing a list of possible actions that pertain specifically to specific desired conditions and a “discussion” in the draft EA regarding their relative merits and disadvantages. Though the Salter project area is quite often considered a homogenous forest, there is indeed significant variance across this landscape, therefore a variety of management tools/actions will need to be utilized across the region to move the forest structure from the current condition(s) to the desired condition(s).” (Appx A, page 2)

Despite our recommendations that a variety of approaches and Alternatives be examined, we have come away firming believing that the silvicultural vision of the Dolores District was already pre-determined and the possibility for input from stakeholders is apparently closed. For example, there is no discussion per the possible use of a different basal area (BA) ranges relative to site indices or other metrics and no discussion of possible use of POL (products other than logs) with a supposition that there will be lop and scatter and then pile burning. It is clear that the supposed Alternative 3 is not really a fully described Alternative and therefore one that can neither be vetted on its own merits or even fully understood due to the lack of descriptive text in the EA. The Contents pages (pages i-iii) clearly reveal the disinterest in any other possible Alternative beyond the Proposed Action (Alternative 2) – Alternative 3 is not even listed in the Contents!!

- B. The Scoping Package (page 2) outlines the proposed “starting point” for the project by noting the current conditions will be defined by the agency: “The purpose and need for this project is derived from the differences between the existing forest vegetation conditions and the desired forest vegetation conditions, as defined by the SJNF LRMP.” Certainly, this approach is no surprise and we would expect SJNF to detail the current conditions, however, the draft EA document failed to include and therefore share with the public the Common Stand Exam (CSE) data upon which we would assume the current conditions are founded. This information was not shared with the public despite the specific request in our scoping comments (see Appendix A, page 2) that “strongly recommended” the inclusion of CSE data:

“First, the agency should organize and make available the common stand exam (CSE) data and associated files, shapefiles, etc. along with a key or instructions to access this information for use in providing comments in this NEPA project. The CSE should be organized and exhibited to the public in a manner that is easily understandable to the public, preferably in a format that has a visual representation of the data. For the public to “weigh in” from an informed point of view there likely will be a need to explain the data and provide points of context. This is a great opportunity for the public to be further educated about the forest that is their watershed, recreation area, hunting grounds, firewood collection acreage, etc. Ideally the public will be able to review the document and be able to make informed remarks as related to various metrics of their forest from the shared CSE data and other current condition information.”

The scoping package (page 1) goes on to describe the current conditions in the Salter area:

“The forest conditions in the proposed treatment blocks reflect an even-age structure comprised of densely spaced, over-stocked medium and large pine trees in a single structural layer.” While this is useful general information, it fails to provide any type of detailed overview of the current conditions including addressing critical data-sourcing questions such as “what is the range of density (basal area) across the Salter landscape that would imply the area is “over-stocked with medium and large trees?” Further, this page 1 description provides no information about the age of trees across the Salter landscape and what percentage of the trees might represent various cohort groups. The assumption seems

to be made by the District, or perhaps “just” in their portrayal of the current conditions, that because the area consists of “a single structural layer” that the area is entirely homogenous across numerous metrics including density and age classes. Though the scoping package text notes “Smaller trees, saplings, and seedling are infrequent or lacking entirely.” (page 1) there is no mention of the specifics regarding (for example) of other cohorts such as older trees, which are of a particular interest to our organization. The scoping package fails to describe, or even note the existence, of the diversity of the forest within the Salter project area – neither by age class, diversity of tree species, or basal area (BA) per acre. The public is being delivered a “snapshot” of the Salter area as being very much a homogenous ponderosa forest, and it is not – an hour long visit to the area easily dispels that myth.

Minimally the district should have provided the CSE from the get-go, that is, included in the scoping package which would have provided the best “picture” of the landscape for the public/stakeholders on which comments could have been predicated. Even better would have been providing to the public a “layperson’s version” of the CSE making it even easier for the public to understand the Salter forest rubric. And while it would have been best for this info to be provided at the scoping phase, it most certainly should have been available in the Draft EA as requested by ourselves and other commenters. Unfortunately, our takeaway from this lapse on the district’s part is that there was not truly an interest in sharing this current condition with the public as part of the process – we’re quite sure the information exists, so why not share it with others? The addition of “Figure 4 Diameter range of Ponderosa pine in the Salter treatment area” into the Final EA is of course welcome as shared information, but this is the type of data that should have been shared at the scoping phase ideally, or at least in the Draft. Withholding critical information until after the decision is made eliminated the public’s ability to provide data-based comments (along with possible Alternative), eroded trust in the process, decidedly narrowed the project design elements considered, and in sum set the stage for a process with a seemingly pre-determined outcome.

- C. We recommended the inclusion of economic information and associated analysis regarding “varying actions that could potentially be elements of the project.” While there is some text within the regarding the forest products industry benefits there are no dollar-figure specifics as we asked for that would give the public an understanding of various possible revenue streams along with costs associated with the project. There is no financial information describing various forest management options and therefore absolutely no sharing with the public of the financial status and foundations of the projects – certainly public lands owners who are footing the bill for any type of forest treatments deserve to have this information shared directly with them.

The only “dollar sign” (\$) within the entire Draft EA relates to the investment in the recreational sector (trails) within the project area. Though we did not request information regarding the recreational economic sector that relates to the Town of Dolores and the Salter/Boggy Draw area (naïvely believing that such foundation project area information

would be included without us asking) there is essentially no specific information about the recreation economy's current status and how it might be affected positively or negatively by the project. Neither is there context per grazing permit economic and the specific hunting-related economy.

- D. Climate change and related issues included carbon sequestration, the carbon footprint of the forest treatments, the management direction from climate change models, and others should have been fully explored in the Draft EA and our scoping comments offered some recommendations to follow to that end. Rather, the Draft EA minimally explores and address these issues despite this apparent direction from the US Forest Service's homepage:

"To stay healthy and vigorous, our National Forests and Grasslands will need to adapt quickly to the changing climate. The Forest Service is incorporating the best ecological and climate science into its management to ensure that National Forests continue to produce the benefits that the American people enjoy. Healthy forests and grasslands will also help mitigate climate change by removing carbon dioxide from the atmosphere and storing it in plants and soils. In addition to our work on public lands, the Forest Service works with private landowners, non-governmental organizations, and tribal governments to foster climate-informed, sustainable land management."

The Draft EA either glosses over or completely avoids many climate/carbon related issues such as:

- Though noting from the 2013 LRMP, Volume 3, Appendix G, 2.9.1, Timber Management and Special Forest Products, Desired Conditions (page 11) that forest management "anticipates climate-related plant succession changes (such as favoring heat- or drought-resistant tree species as leave trees, or in reforestation).", there is no discussion or even mention of the what the agency's own climate modeling indicates for the ponderosa pine forest type on the Dolores District and on nearby lands. Climate modeling including this recent compilation from USFS's Jim Worrall (<http://dwrforcollaborative.org/wp/wp-content/uploads/2018/06/projected-impacts-of-climate-change-on-forests-of-the-dolores-watershed.pdf>) indicates significant decline in the health and range of the Ponderosa pine forest/vegetation including the Salter area.
- There is no analysis of the actual carbon "footprint" of the proposed project and therefore no subsequent discussion and "weighing" of the choices to be made relative to climate/carbon issues.
- The Salter NEPA process also ignores (not mentioned either in the Draft or Final EA's) our recommendation within our scoping comments that due to continually changing forest conditions regular reviews should be undertaken at "possible decision points" to consider adjustments to the project implementation. And a methodology recommended in our scoping comments derived directly from the forest plan, "This approach is reinforced in 2.9.9 from Appendix G, "Every 3 years review silvicultural prescriptions for incorporation of strategies that anticipate potential plant succession changes relative to warmer and/or drier forested conditions." (page 3) was evidently ignored.

From the SJNF's lack of response to our scoping comments on these issues and the minimal attention given to this carbon/climate realm it is clear to us that the Dolores District does not have an earnest issue in exploring this topic and how the Salter project "fits into" the challenge we face with a changing climate. Despite the apparent direction given by Secretary of Agriculture Tom Vilsack this past February, "President Biden's nominee for secretary of agriculture, pledged Tuesday to focus on climate change initiatives and work to address racial inequities in agricultural assistance programs.", we observe a lack of commitment and interest at the project level as evidenced by the belittling of the climate/carbon issue in this NEPA process. Examining the carbon context of silviculture is a relatively new issue for the USFS to examine, but that is not a license to ignore its overarching importance to all forest management decisions.

Suggested Remedy

The CSE data (and preferably in "layperson form"), a diversity of economic information directly related to the project including the recreation economic section, and in-depth information and analysis regarding the carbon/climate aspects are all critical to the design and implementation of any project in the Salter area. This information should be made available to the public within the issue of a new draft EA which will give the opportunity to the public to view the material and comment. The review and integration of the information noted above might very well indicate and support the need for additional Alternatives which would be added to the Draft EA.

Ideally, the project should be entirely "restarted" with at least some of the missing information being shared initially (such as the CSE data) in a new scoping process which would allow stakeholder's full involvement in the process including the development of Alternatives, however, a "combined" scoping and Draft EA phase of the NEPA process could be a way forward if the public had enough information to create and submit Alternatives or management strategies and tactics.

From our experience with this NEPA process we seriously question if the Dolores District was truly interested in garnering, reviewing and possibly including information submitted in scoping comments. From our experience, and from the experience of some other stakeholders, we have unfortunately come to the conclusion the District was not earnest in their outreach for input as so much of it was ignored or minimized. This approach is a breach of the public trust, it is poor policy, does not serve the agency well in its standing with the public – plus it is unlawful.

We note that the SJNF "backtracked" after the February 2021 release of the Draft EA with a presentation to provide more information to the public which appeared to be a response to the public's early feedback that the Draft EA was woefully deficient of critical information on which to consider and make an informed decision on any Salter-situated project design choices. Much of the information shared in the Powerpoint presentation I observed in early March 2020 seems to be information not included within the Draft EA, which we are guessing was a central reason for the presentation – to provide more data. Because this "visually-shared" information

was not a part of the Draft EA it was not a part of the NEPA process, and we remain baffled as to why the agency withheld useful information (presented visually) without including it in the Draft EA.

3. Environmental Assessment Lacks Sufficient Information and Best Available Science to Support a Decision

As is integral to any National Environmental Policy Act (NEPA) process and as specified in the Act, relevant and necessary information must be generated and made available to the public to understand and comment upon a project being examined within NEPA. The San Juan National Forest (SJNF) opened the public input for this project with a Scoping Notice (February 21, 2020) after presumably gathering sufficient information internally to share the preliminary project design with the public.

SJCA submitted scoping comments (see Appendix A) that addressed salient project issues and specifically asked for specific information to be incorporated into the NEPA process to be analyzed and shared to aid in the development of the project, decision and project implementation. Section 2. above delineates the information and subsequent analyses that we requested through the scoping process. Subsequent to the scoping phase it came to our attention that there was additional information critical to the NEPA and subsequent decision making process that was either inadequate or entirely missing including:

- Information regarding the economic aspects that will be affected by the proposed Salter project another than for the woods products industry. This would minimally include the investment made in trails in the Salter area, the value of the components of the local economy related to the public use of the Salter area, and an understanding of businesses (and their employees) whose well-being is closely associated with the non-timber aspect of the Salter area including outfitters, guides, rental businesses, hunting-related businesses, grazing permittees and others.
- As we have stated above the CSE data was not shared which make it difficult, if not impossible to understand the current conditions. Anticipating the need to have this information “in hand” for use by agency staff, other land management agencies and the public should have been obvious and the NEPA process should never have commenced without the ready availability of the CSE data.

Suggested Remedy

Similar to our other Suggested Remedies, the project needs a restart to include the necessary data and context from scientific research upon which to base the project design. We note the comments (scoping and Draft EA) in which the agency received recommendations from an “outside professional” source to review various research to help guide the project and we observe most of these suggested sources were evidently not utilized. Even “inside” sources with the best available science were seemingly ignored such as the aforementioned work by USFS’s Jim Worrall.

4. Lack of Range of Alternatives¹

NEPA lays out the need for a range of Alternatives based on the premise that (in the case of a potential Salter project) the best forest management practices and their implementation are derived from reviewing a diverse array of management choices as opposed to (for example) moving ahead with an approach of “this is always have we do this.”

Even a cursory examination of the Salter project area indicates that examining a variety of Alternatives based on an array of management actions is a smart approach. The size of the proposed Salter project, even after it was trimmed to include only suitable base lands, is still very significant in size, approximately 35 square miles. These 35 miles, as we have noted above, are multiple use lands that provide access to thousands of users/visitors per year for a diversity of purposes, many of which relate to the economic foundations of the Town of Dolores and Montezuma County – in sum, this is a heavily used multiple-use area. As well, while the common stand exam data or another form of the current forest/vegetation condition was never shared with the public during the NEPA process (and still remains an unknown to us) we are sure there is a good measure of homogeneity in the forest due to the varied characteristics such as soils, aspect, elevation, etc.

Bringing together these basic elements of the Salter area (large size, heavy multiple use, heterogeneity of the forest/vegetation condition) indicates that there is sufficient diversity that an array of management strategies needs to be employed and therefore, through the lens of NEPA, numerous Alternative must be developed and presented in the Draft EA. This approach, however, was not undertaken and besides the minimum requirements of the No Action and Proposed Action Alternatives there really is no other. While “lip service” is given to a third Alternative, this Alternative is never fully described in the Draft EA – as we noted above it is not even listed in the Contents. Minimally, one other action Alternative should be fully described though it is evident to us that there was the need and possibility for another Alternative presented that could have (for example) been a balanced “mix of wood products and recreation interests” as these are the two most significant uses of the area. The minimization of the Alternatives detailed in this process calls into the question the Dolores District’s interest and commitment to examining other possibilities, including those that might be a minimal “tweak” for the commonplace approach to forest thinning or those that might detail a radically different approach to the opportunities and challenges of the Salter landscape. As the NEPA process was managed, there was no range of Alternatives offered – and of course, without the public availability of the CSE it was impossible to know fully what is “out there” on the landscape representing the current conditions. We fully understand that these are MA-5 lands and within the suitable base, but it is true that these are not the only uses of these 35 square miles nor that timber harvest is necessarily the highest and best use for this area at this time.

¹ As use as capitalized, “Alternative(s)” is utilized in this document to specifically denote NEPA Alternatives.

Suggested Remedy

As we have suggested above, the only corrective course would be to restart the Salter NEPA process. A new start would include providing a more thorough assessment of the current conditions (including the CSE), information regarding other economic interests on the Salter area and associated areas (this would include the Town of Dolores, recreational economy values, etc.), potential other “federal financials elements” (such as road support monies – including building and/or decommissioning) and other factors that would be important to the development of Alternatives. If the agency holds all of the informational “cards” they are the only ones in the “NEPA game”, rather the necessary information must be disseminated to the public so they can also development and share forest management approaches including Alternatives that support the agency in sharing the required range of Alternatives.

5. Non-disclosure within the NEPA process of the Best Available Science and other Relevant Project Information

We note that the Dolores District evidently considered issuing a new version of the Draft EA after receiving scores of comments with varying concerns regarding the project design and implementation as outlined in the February 10, 2021 document (with a 30 day comment period) along with the lack of an array of salient information. The district attempted to “backfill” the lack of specific information in the Draft EA by providing additional information in a presentation made on March 9, 2021. While this information shared with the public was significant in substance, we find it odd and troubling that much of the information provided in the presentation was not provided in the Draft EA – why was this information presented outside of the NEPA process? We would assume that the information presented on March 9 was readily available to the SJNF as it was available to share with the public less than a month after the Draft EA was released which leaves us baffled as to why this info was not included in the Draft EA. The release of this information as a presentation that was available only to those who per chance heard/read of the presentation (we are not aware that it was not an officially noticed event) **is not a substitute for the disclosure of critical information foundational to the design and implementation of the Salter project.** This information should have been included in the Draft EA from the “get-go” (some of it should also have been included in the scoping package), but it was not – though it’s particularly relevant data:

- As previously noted the Common Stand Data was not made available.
- The Draft EA fails to provide sufficient information to understand the current conditions, for example, the % of forest species components; the range, distribution and occurrence of acreage by BA (basal area).
- The EA fails to consider the ramifications of utilizing a 50-70 square foot BA across the entire 35 square mile project area and in that fails to fulfill its stated objective of a “landscape approach” to the project:
 - The SJNF utilizes the reoccurring mantra that a management goal is to work at “landscape scale” that is reiterated throughout the document as it relates to many values, interests and resources (as is detailed in these

Final EA excerpts: 1) This goal is detailed throughout the Final EA including: “...increase the structural diversity of the ponderosa pine forest represented across the landscape,” (within “Introduction” 2nd bullet, page 1), 2) “The goal is to move stands to desired conditions given the variables of this landscape. “(page 16) and 3) “These stand components will continue to influence management on this landscape to meet desired conditions.” (page 66). Despite this professed aim of landscape-scale the agency is seemingly desirous of locking into a narrow BA target.

- The detailed 50-70 BA target and the connected approach of desiring to reach this BA on every acre is both unjustified and has applied self-imposed and scientifically unsound approaches to project design elements. For example, on numerous occasions over the past two years I have been told by SJNF that a diameter cap will not be utilized as it prohibits the agency from meeting the BA target and therefore “desired conditions cannot be reached.”² Unfortunately, the Dolores District is stuck on the thinking that every treated acre must meet the BA range, yet it is evident from any aerial photograph or significant hike through the Salter area that there is a great diversity across these 22,000+ acres – there are differences in aspect, slope, soils, site index, understory context, current conditions per cohorts and canopy, and so on. A project that is restricted to a 50-70 BA target across all of these acres is inherently flawed – conditions to meet resilience and resistance objectives (as noted in the Introduction, page 1) will certainly never be meant by applying at 50-70 BA across this landscape. Though the Salter is a more homogenous forest now than was indicated by the historical range of variability (HRV) and then we desire it to be in an FRV (future range of variability), locking in a 50-70 BA across 35 square would certainly be an errant forest management approach, especially considering that the professed aim is to increase resilience and resistance through a more diverse/heterogenous forest.
- The lack of a landscape approach strategy for management on this project is exemplified by the agency’s decision to using the same BA range across the entire landscape which likely neither mimics the historical range of variability nor is a wise target for the future range of variability.
- Perhaps we have missed something in the Final EA, but we have found nothing that indicates there are research findings or other science-based thinking that informs the 26.9” inch cap to harvesting. It strikes us as peculiar that no trees will evidently be cut

² I cannot corroborate the date and the SJNF staffer who made the statement, but I was told that 38% of the Salter project area would not be able to meet desired conditions if the BA area target (somewhere in the 50-70 range) if a diameter cap (perhaps this could be also referenced as “large tree retention” approach, too) was utilized. This thinking is apparently based on the management scheme to fit every acre into the BA target which of course was neither the historical range of variability or should it the future range of variability. This “every care the same approach” is counter to resiliency and restoration foundations and objectives – “cookie cuttering” the landscape with the 50-70 BA strategy is from another era of forestry, long ago.

above this size (even if it pushes beyond the 70BA?) while the agency refuses diameter caps as a management strategy elsewhere for the project. We have heard that one of the larger wood products industry companies cannot not saw logs larger than 27" which leads to the concern that this diameter cap designated by the forest is specifically designed to fit one company's production equipment. Needless to say, that very much appears to be an approach that is not based on science and matched for the needs of one potential contractor – which certainly leads one to wonder about favoritism as associated to potential contract letting.

Suggested Remedy

The Dolores District should withdraw the Draft Decision and reissue a new Draft EA that includes all of the available and best scientific information that would inform the design and implementation of any Salter project. Pending the public release of the common stand exam data, there is perhaps some useful speculation in suggesting a range in the basal area that is a good match to the target for a future forest with of a more heterogenous stature per its age and class structure as well as other variables. We would suggest that the BA be established at a much wider range, perhaps 30-120 which would support the need to utilize a greater diversity of project design elements as it be possible to better "mimic" the inherent diversity across the landscape as well as to enhance the diversity. Amongst the project design components could be a diameter cap as it would support the need to increase the diversity through the retention of large trees, of which the information provided on page 7 of the Final EA indicates are rare across the Salter area with seemingly a sizeable diameter size drop of trees more than 22". Also, "breaking free" of the 50-70 BA focus would allow the better support of other features of a heterogenous forest such as clumps and groups which we know are important forest aspects for numerous purposes. A greater range in the BA would allow a more dense set of acres where the site index is high, moisture and aspect are favorable, etc. allowing desired (for increased homogeneity) clumps, groups, cluster of bigger and older trees that might very well push the BA (for example) toward the 120 edge of a range, while allowing another set of acres to remain or become more open as a meadowed area, an area particularly well situated for ponderosa pine regeneration or to leave "as is" knowing it is a dry are with limited productivity possibility.

6. Specific Design Criteria Objection Points

- 1). **Fuels #6.** (page 21) We are concerned that a depth as much as one foot for lop and scattered materials would be represent too much fuel left on the forest floor at least in some locales depending of forest density and soils. We would suggest 6" or a range of 6" to 9".
- 2) **Need for Proposal** It is stated that: areas treated previously in order to maintain sustainable conditions and improve scenic integrity (fifth bullet, page 9). Our rPeview of he Final EA and Draft Decision don't convince us that there is sufficient protections for this scenic objective that would need to be detailed in project contracts to protect the "scenic integrity of the desires of other users/interests of the Salter area including recreational trails.

3) The responsibility for implementing various project elements is unclear to us. For example, in the **Recreation and Public Safety section: 3**. In the event that a decrease in tree density results in easier access to dispersed camping sites beyond what is allowed by Forest Service regulations, barriers such as boulders will be installed to control the expansion of dispersed camp sites. (page 23) it is not clear whether the SJNF or contractor is responsible for installing such boulders. We would think it would be contractor who 1) has equipment on the site already and 2) it is an apparent “cost of doing business”, but the text is unclear regarding this (and other) important contract responsibilities.

4) Also, within the **Recreation and Public Safety section: 4 j**. Sections of trails will remain open for use if detours via system roads are available. If timber operations (harvesting and hauling) do not pose a safety risk to users of trails within an active sale unit the trail will remain open.(page 24). From what we can discern from this statement and elsewhere in the Final EA is unclear who will be responsible for bringing the existing trails back into their current condition and in what timeline. Southwest Colorado Cycling Association and partners have invested hundreds of thousands of dollars in the Boggy Draw trails system, but we see no guarantee this investment will be honored by returning the trails to their original operational condition.

Conclusion

As San Juan Citizens Alliance’s Land and Forest Protection Program Manager, I am the organization’s lead on forest, fire, forest watershed and other forest related issues and am a founder/co-organizer of the three forest/fire/watersheds that correspond with the three ranger districts on the SJNF. From my more than a decade’s worth of experience and involvement with all projects on the forest I have a somewhat unique perspective of assessing the relative approaches to forest/vegetation related “entries” on the forest, being it WUI treatments, timber harvest, firewood access activities, “salvage logging” and others. As part of my assessment of these projects I review the relative “balance” of these proposed projects as well as the worthiness of the associated NEPA. The balance I refer to associates with the USFS’s target of the “balanced three-legged stool” of social, ecologic and economic.

Of all the projects that I have reviewed over the past decade the Salter project is the one is most errant related to its failure to reach the social/economic/ecologic balance point as well as in the shortcomings of its NEPA process. Many aspects of the project appear to be specifically driven by the desires of the forest product industry, despite the negative consequences to the ecologic realm and other social and economic realms, most notably recreation. These observations are further supported by observing the content of the formal Objections submitted as of August 6, 2021 with 1) two (identical) letters from wood products industry representatives who points of objection are quite minimal and mostly related to insuring their maximum financial benefit, 2) the Town of Dolores letter highlighting project design concerns that they believe will adversely affect the town’s residents and infrastructure as well as the town’s economic well-being of which there has been a decided increase in recreation-based income in the last few years, 3) the comments of a very experienced forest ecologist and the objection and 4) of the most involved bike trail advocacy group in Montezuma and Dolores counties.

While, as we have noted above, we recognize that this project is located on MA-5 lands and the vegetation manipulation/removal would be located on lands designated in the 2013 SJNF forest plan as suitable timber base, it remains critically important that any management action taken on these 35 square miles whether it be forest products, grazing, recreation, watershed management or other resource must meet the “three-legged stool” standard. The Salter project, as outline in the Final EA and Draft Decision does not, and as noted in our specific objections above it fails to meet needs in all three of components, especially ecologic. We fully believed that the era of “1960’s/1970’s MBFT-first management has passed, but clearly this is not the case. Just because the term “restoration” is hung on project label (as it is with the Salter project” does not mean necessarily that it is truly a restoration project from a sound scientific standing. The Salter project, through many indicators, appears to be a project designed to boost the timber harvest numbers of the SJNF and meet industry’s eagerness to reap financial rewards off of the unfortunate status of our ill-managed national forests without considering the likely “costs” to the forest health/structure in the long term, to the residents of the Town of Dolores, to the recreationists likely to use the Salter area over the next deade, and to the economic well-being of the town of Dolores. Indeed, even the third bullet in the Purpose and Need Introduction “gives away” the Dolores District’s thinking as to economic priorities when it details “provide economic support to local communities by providing timber products to local industries in a sustainable manner.” Certainly, most of us know that there is an already existing economic foundation in Dolores **not** based on timber products – how about their sustainability?

SJCA has invested scores of hours in meetings, side conversations, submitting comments, reading research, visiting the project area, conversing with stakeholders and more – all of this being oriented to finding a balanced solution, a win-win-win, and a balanced position on the three-legged stool, with little positive result. Our scoping comments were entirely dismissed and most of our Draft EA input was as well – indeed, we are not suggesting we have “the answer, the solution” to this rubric, but it has been become clear to us that the Dolores District and its parent SJNF had no serious intention to alter their envisioned and pre-determined outcome to this NEPA process. There really is only one sensible, ethical and trust-promoting avenue to effectively move ahead, that is, start over.

Sincerely,



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Attachments

Appendix A: SJCA Scoping Comments – Salter EA Process (March 20, 2020)

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