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First name: PATRICIA

Last name: DORSEY

Organization: National Wild Turkey Federation

Title:

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Mr. Derek Padilla, District Ranger

Dolores Ranger District

San Juan National Forest

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

RE: SALTER VEGETATION MANAGEMENT - Environmental Assessment

The National Wild Turkey Federation (NWTF) is proud to be one of the Forest Service's most active national partners. We have been engaged with the Forest Service since establishing the Making Tracks Program in 1986. The NWTF is a co-convenor, with the US Forest Service, of the Rocky Mountain Restoration Initiative (RMRI). The RMRI is a partner-driven organization of over 70 partner organizations and more than 200 individuals, making it a national pilot and model of shared stewardship with the goal of increasing the pace and scale of forest restoration work.

The four shared values of RMRI: wildlife, water, communities and recreation are at risk from catastrophic wildfire. Past fire suppression, a lack of active forest management, climate change, severe drought, beetles and disease are increasing the risk of catastrophic fire. We understand that prescribed and managed fire are important and necessary on the landscape. We describe "catastrophic fires" as large, high intensity fires that fall outside the natural fire regime, have little ecological benefit and threaten homes, our water supply and other important community values.)

Southwest Colorado was unanimously selected by the RMRI partners as the primary landscape, in which to start this forest restoration work. The Southwest Colorado proposal includes treating a total of 310,000 acres of public and private land in the ponderosa pine forest type, along the US Highway 160 corridor, connecting the local communities of Dolores, Mancos, Durango, Bayfield, etc.

The Salter Vegetation Management plan objectives are to: improve the resiliency of ponderosa pine forest ecosystems, increase the diversity of ponderosa pine forest, and provide economic support to local communities by sustainably providing timber to local industries. These objectives align with the overall goals and values identified by the RMRI partners. Including local industry benefits the community and is a cost-effective way of managing forests into the future. Local industry is a partner in providing forest resiliency, reducing the risk of catastrophic fire and restoring ecosystem services that healthy forests provide.

We realize that there are some short term effects of active management as the US Forest Service works toward the long term objectives. We appreciate that the San Juan National Forest has done a thorough analysis of those effects and has developed mitigation measures to minimize short term, adverse effects to the trail system, recreation, public safety, etc. We also appreciate that the San Juan National Forest has included protection of critical wildlife habitats, such as raptor nests, elk production and winter range, snags and wild turkey feeding areas in their project design. The installation of guzzlers in treated areas without perennial water, as an included/other action shows the coordinated effort to make this a forest vegetation treatment that benefits multiple values.

The adaptive approach chosen allows the San Juan to adjust management with changing conditions. The San

Juan also sees this adaptive approach as a vehicle for communication with the Dolores Watershed Resilient Forest collaborative (DWRF). Communication with the interested public will be important in achieving the long term objectives of the project.

We understand the desire of the public and the US Forest Service to keep large trees and the need to maintain some flexibility within the management prescription. We have observed that a diameter cap has limitations and may limit the ability to achieve the long term objectives. Ecosystems are complex and diverse that are not well served by a one-size-fits-all approach. It is our concern that a 20" diameter cap may perpetuate homogenous forest conditions and create stands that lack diversity of species, age class, and seral stage. Supporting a diverse array of wildlife species requires a forest with diverse composition of tree species, age classes and structure. The danger in prescriptive management is the risk of creating unintended consequences without flexibility to address them.

The NWTF supports science-based alternatives that provide managers with flexibility to address forest health conditions at the landscape level. We also support giving managers the tools needed to meet the goals of achieving forest health and long-term ecological benefits. The proposed alternative allows Forest Service professionals the flexibility to manage on an individual stand basis for desired outcomes, maintain high quality habitat for wildlife, and be accountable to the public, addressing concerns about trust.

The NWTF feels that the proposed alternative goes a long way toward creating fire resilient forests, and enhancing wildlife habitat. Thank you for your consideration of our comments. The NWTF looks forward to working with the Forest Service in developing this amendment. Please keep us informed as this process progresses. If you have any questions or concerns, please reach out to our District Biologist, Jamie Nogle, who can be reached via email.

Sincerely,

Patricia Dorsey  
Director of Conservation Operations, West Region  
National Wild Turkey Federation