

Data Submitted (UTC 11): 3/13/2021 4:04:31 AM

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Organization:

Title:

Comments: Comments on Salter Vegetation Management Project

March 12, 2021

To Whom it concerns:

Having come to care deeply for the ponderosa and PJ forest of the Boggy Draw area over the past 17 years, I appreciate this opportunity to provide comment on the EA for this project.

The staff of the Dolores Ranger District has clearly put time, care, effort, and thoughtfulness into trying to balance the needs of the forest, the timber interests, and the general public in service to improving the long-term resiliency of the forest for the benefit of all.

1) Forest resiliency

The primary purpose of this project is forest resiliency, and that primary purpose must be kept in the forefront at all times as the long-term health of the forest impacts all the humans and non-humans who are supported and nurtured by it. Some of the aspects of the plan, such as removing diseased or structurally unhealthy trees and enhancing the qualities of uneven aged stands certainly serve this purpose, and I support these aspects.

I am concerned, though, about the diameter class size which allows the taking of trees up to 26.9 inches. Trees of this size are well on their way to developing the characteristics of fire resistance, namely, thickening of the bark and dropping of lower branches. If trees this size are too crowded (i.e. their crowns are in close proximity to each other), the need for thinning is there. However, trees of this size also need to be protected as much as possible as the number of large trees is scant. If this size class remains, it is essential that the USFS limit the taking of trees this size to only those that are overcrowded. Preferable, the diameter class size should be reduced to the 20 inch class size.

The nature of the understory is critical to the resilience of the ponderosa forest. Detailed plans regarding the mediation of excessive oak brush must be part of this vegetation management project.

Once the timber extraction is completed, the areas should be planted with native grasses, flowers, and other plants that form the understory of a health ponderosa forest.

I do not know how much the project areas overlap with grazing allotments. Where they do, cows must be kept out of areas to allow them to fully revegetate. The subsequent numbers of cows on those allotments must be kept a sustainable numbers. Obviously, premature grazing and overgrazing of sections of forest is antithetical to the goal of improving forest resiliency.

2) Wildlife

The forest can neither achieve nor maintain good health and resilience if the living beings that co-evolved with the forest are not doing well. The forest depends on all its living creatures from the fungi and microorganisms to the largest mammals to the forbs/grasses to the tree canopy and shrubs for its optimal health. Therefore, disruptions to wildlife, large and small, must be considered in any project.

Logging operations should be kept out of wildlife corridors and out of critical habitat for all animals, not just "big game." Wildlife biologists should be cognizant of nesting and denning times and areas and minimize timber operations during these times and in these places. Especially given that the use of the trail system that many of us enjoy has likely caused significant distress to wildlife, adding additional distress is to be avoided.

3) Hauling

I question the safety of logging trucks on CR 31 which is a winding road with sharp curves. Steps must be taken to ensure the trucks will be going at speeds safe for the pedestrians, cyclists, and motorists who use CR 31.

The information provided at the meeting on March 10, 2021 regarding the number of haul loads per day was vague. Stipulations are needed to ensure that the number of loads per day are limited to a safe maximum number. I would have to defer to transportation experts to determine what that number might be.

4) Recreational Impact/Economic Impact

I appreciate the efforts made to protect areas of beauty and interest by not having timber sale units in these areas.

Information regarding the number of units/subunits that can be in operation in any one time is vague. Also, the number of trail closures/area closures allowed at one time is unclear. The EA should provide clear parameters regarding such numbers. And such numbers should be limited in a way that does not cause unnecessarily broad or prolonged disruptions of the use of these areas by the general public. Furthermore, clear language should be in place stating that a contractor must finish with one area (including restoration) before moving to the next.

Many people are concerned about the aesthetics of these projects. Whenever the aesthetics can be mitigated quickly (e.g. hasty removal of slash piles), they should. However, the desire for aesthetics is secondary to the health of the forest. Decreasing density of the forest and the undergrowth may interfere with the visual aesthetics and the visual buffers that give a sense of seclusion. Wherever possible, such features should be maintained. However, the health and resiliency of the forest must be the primary focus.

The SWCCA has outlined good suggestions for minimizing impact to recreation. I have included excerpts below:

TEMPORARY TRAIL CLOSURES -

NO-WORK, NO TRAIL CLOSURE - Lifting closures any time there will be more than a two-week no-work gap in operations.

TRAIL DETOURS - Utilizing existing, numerous roads as trail detour routes instead of a complete trail closure. SWCCA volunteers are willing to assist with the trail detour routing and the placement of temporary guidance signage.

NO-DANGER, NO TRAIL CLOSURE - Only close the trail section when there are dangerous operations within a defined buffer around the trail. SWCCA volunteers are willing to assist posting "Danger, stay on trail..." signs and assist in marking buffer area.

ROAD/SKID CROSSINGS - Trail skid crossings should be treated like a road crossing with appropriate signage and not a trail closure. If there is resistance to a safety need for logging truck speed limits on FS 527 why would it be any different for crossing a skid road.

ONE TRAIL CLOSED AT A TIME - Recreation treatment blocks limited to treatment one at a time should include all blocks in the Boggy Trail System 1-6. There are trails like Boggy Draw and Mavericks that are needed to access other trails, closing these makes access to other trails difficult requiring navigating logging vehicles on roads and other project hazards.

DAMAGE TO TRAIL TREAD:

- Singletrack tread quality, scenery and trail flow is critically important to most Boggy Draw trail users.

REROUTE TRAILS OFF HAUL ROADS - While the EA calls for returning any trails damaged by timber management operations to pre operations conditions, a significant impact would be on the sections of existing trails that happen to be on Level 1 roads (closed roads that are in storage and can be reopened for projects). The EA allows for some of these roads to be kept open for slash treatments, and possibly reopened and rebuilt for future logging operations. This will obviously destroy the singletrack tread and reduce the value of the trail and user experience. Efforts to rehab the haul roads back to singletrack trails could be delayed for months/years because of the various project steps requiring road access, like cutting then later dealing with slash piles. The best solution would be to reroute all non-motorized trail sections off the Level 1 roads prior to the logging operations.

REROUTE HAUL ROADS OFF TRAILS - Another component would be permanently removing the Level 1 status from appropriate already closed road sections overlapping the trail and rerouting haul roads off of trails. There are haul routes that obviously look like old closed roads but there are other sections where there is no sign that the trail was ever a road. Specifically, there is a section of trail where a haul road could be constructed on top of

what we consider pristine trail. This section is directly south of the FS 527 and FS 527.H intersection. Rerouting this haul route to 527.H seems logical, shortening the haul distance.

USE TRAIL AS SUBUNIT PERIMETER WITH BUFFER - When units are broken down further into subunits for contractors there should be an effort made to use trails as perimeters which also help with adding a buffer around trail that is easier for contractors to avoid. Using trails as perimeters also avoids unnecessary trail crossings. However, both sides of trail should have consistent treatment. Using trails as perimeters decreases marking and management work by having a perimeter only and not an additional corridor to avoid in the middle of a subunit. Also, an effort made to not split subunits between numerous contractors along a stretch of trail avoiding sporadic closures because of varying work schedules.

PRE AND POST CONTRACT WORK OVERSITE INVOLVING RECREATION STAKEHOLDERS - We have heard that in another similar project there was not enough oversight to ensure EA requirements were adhered to. Penalties and pre- and post-inspections would help prevent this before it is too late. Trail stakeholders should be able to inspect periodically along with FS recreation personnel. Also, some of the required design features are vague. Current Dolores District staff seem to have a good understanding of SWCCA perspectives of these items, but future staff may not be as congruent.

5) General Comments

The intention behind this project is a good one. In order to promote forest health and resiliency, many of us will need to be patient with closures, noise, traffic, changes in aesthetics, etc. As stated above and by so many other commenters, these negative effects should be minimized.

Given that the goal of the project is to ultimately improve forest health, and doing so will allow people to continue to camp, bike, hike, etc. by decreasing the risk of catastrophic wildfire, I suggest the Dolores Ranger District be aggressive with public education regarding the benefits of these projects (if done well and appropriately). Doing so will help locals and visitors alike weather the unpleasant aspects of the project with more patience and perhaps more trust.

Thank you for considering these comments.

Sincerely,

Robin E. Richard