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Comments: Thank you for the opportunity to comment on the proposed HD's Restoration Project.

I am a Retiree from the SJNF. A co-worker and I conducted most (if not all) of the on-the-ground Old Growth inventories that were done in the HD Mountains.

My two concerns on the HD's Landscape Restoration Pre-decisional EA:

(1) I am extremely concerned that the Pre-decisional EA does not show maps of the Old Growth GIS data layer over-laid with the different types of proposed treatment areas.

Old Growth is NOT just a few "old Ponderosa pine trees." Old Growth (OG) areas are special ecosystems that include all ages of trees, plus dead standing trees, dead-topped trees, rotten trees, and dead down trees (all used by wildlife and birds).

These ecosystems also include lichen growth on trees, some species of which need very specific temperature and moisture conditions before they will even colonize an area. Thus, Old Growth has more lichen diversity than younger-aged stands.

All OG ecosystems include many kinds of fungi and mycorrhizae in the soils which help distribute necessary nutrients between trees. Fungi species would be much disrupted by ground-disturbing activities in Old Growth such as mastication and thinning. Climate change and current drought are already stressing these dry ecosystems. Ground-disturbing treatments would only make this worse.

I strongly request that the District IDTeam and Managers use the San Juan's Old Growth database to protect the existing OG polygons/stands within the HD's. As the LRMP states, Ponderosa pine old growth is "a rare resource" on the San Juan NF.

(2) Nor does the Pre-decisional EA show a map of the Roadless Area within the HD's. This is a major omission in the document. The roadless character of the area must be kept intact.

Thank you for your careful consideration of these concerns.