

Data Submitted (UTC 11): 9/15/2021 1:14:08 PM

First name: Jim

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Organization:

Title:

Comments: Dear Forest Service:

I worked on San Juan NF from 1984-89, and retired in 2002 as Deputy Chief NFS. I know the HDs well. They are not staggeringly spectacular like much of the San Juan NF, but are definitely a unique landscape that deserves special consideration. My observation is that this project is a hammer in search of a nail. Did a boatload of fire money land in your lap and this is your idea of the best way to spend it? The HDs are quite remote and pose little danger to anything if a fire were to occur, thus it seems a few surgical treatments might be more appropriate than the heavy-handed suite of projects you've described. For example, you make no mention of "old-growth ponderosa pine" yet the HDs have numerous inclusions that have been mapped and deserve special protection. Your own forest plan specified only Rx burnings; NO mechanical work, correct? The least you could do is rationalize why you are rejecting your own guidance. Doesn't it stand to reason that these OG remnants have survived historic fires in the HDs on numerous occasions? Why would you conclude they won't again? All these questions should be analyzed and your assessment revealed as part of your NEPA documentation. Treatment of oak brush is another matter entirely, but carefully weigh the cost needed for several thousand acres vs. the anticipated benefit. What "problem" are you solving? The condition of the HDs is largely the result of many decades of natural processes. I doubt they will change much in the next few decades, nor do they seem to pose much of a threat as they are. Tread carefully.