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Comments: Thank you for this opportunity to communicate my thoughts with you about this Project. I will "jump right in" with my Objection comments.

Changes made by the IDTeam between the Draft EA and the Final are a good start, especially the addition of the separate Old Growth report.

(Map in the OG report initially ran off the page (techno issues), but Cam Hooley, NEPA Coordinator, corrected that so the map could be studied more carefully. Thank you, Cam.)

HOWEVER, I still have major issues with thoughts and wording, such as the following, that indicate to me that at least some Columbine District IDTeam people still don't understand old growth as an ecosystem.

My comments follow excerpts that I copied from the EA and enclosed in quotes.

"Old recruitment of dominant ponderosa pine was analyzed....." --- Huh?? This statement makes no sense.

We (the San Juan) are NOT recruiting dominant, i.e. large, old ponderosa pine! We are recruiting entire stands of pine and allowing them to move into an old growth condition, or development stage.

When old growth recruitment is discussed in the SJ Land Management Plan (LMP), it is talking about ADDING entire stands which have several of the defined old growth characteristics, but do not quite meet the definition of old growth for that forest type. For example, if a Ponderosa pine stand has all of the old growth characteristics, EXCEPT the age of the dominant trees is less than 200 years, THEN the SJNF needs to allow that stand to BECOME old growth.

If a stand exhibits some old growth characteristics (per the definition), it should be carefully managed, including being left alone, so that it DOES have time to move into the old growth development stage. That's what is meant by old growth recruitment. It means adding ACRES of a forest type to the existing ACRES of old growth. The intent in the Plan direction is to ADD to the percentage of old growth in a forest type, especially in the Ponderosa pine type, which is in very short supply across the San Juan NF.

"The entirety of the roadless area is being managed for the recruitment of old growth trees...." --- AGAIN, we are not recruiting old growth trees. (See above comments and explanation.)

"...these types of treatments do not focus on the removal of dominant ponderosa pine and would generally retain the primary targets for old growth recruitment." --- Here again, the writers don't understand the idea of old growth being an ecosystem. They still think of, and target (their word), big old trees as old growth. They need to be talking about "old growth stands." NOT just big old trees!

"Old growth recruitment is not a focus in areas outside of roadless or outside of identified old growth stands." ---

Old growth (OG) recruitment NEEDS TO BE A FOCUS of this Project if there are OG attributes in other stands in the project area. That is the only way to add stands to the old growth development stage.

From the SJ LMP: 2.2.74 "Within landscapes not meeting desired conditions for old growth, ponderosa pine forest stands and mixed conifer forest stands that currently are not in the old growth development stage, but that contain significant old growth attributes should be prioritized as old growth recruitment areas, largely based on tree age and distribution across the SJNF, and managed for their old growth values."

Only 3 to 4% of Ponderosa Pine on the San Juan is old growth. Per Desired Conditions in the Plan, the SJ is working toward having 10 to 15% of PP in OG conditions, therefore, the focus MUST be on stands not currently identified as OG.

Discussion of OG must be based on the San Juan OG definitions as stated in the Land Management Plan (LMP).

"No mechanical treatment in OG stands," but will do hand-thinning "if conditions warrant it."

Please define mechanical treatment here.

Isn't hand-thinning mechanical? Do you mean hand-thin with chainsaws or hand thin with muscle power? Either kind of hand-thinning is "disturbance to old growth vegetation."

From the SJ LMP --- 3.25.20 Management activities avoid disturbance to old growth vegetation.

"Kaufmann et al. 1992, also states that minimum age is not a direct surrogate to defining an old growth tree; therefore, tree-level characteristics such as branch diameter, bark characteristics, flat crown, and stand position would be used to define old growth stands during site-specific implementation planning such as burn plans, thinning or service contracts, or in-house work plans."

(1)The San Juan, to my knowledge, never used "branch diameter" as an old growth characteristic.

(2)What do you mean by "stand position"?

(3)Again, the San Juan's Old Growth Inventory does not talk about "old growth trees," but old growth as stands, i.e., whole ecosystems. Please study the old growth definitions in the Plan more carefully.

(4)Why do you write, "tree level characteristics.....would be used to define OG stands during site-specific implementation....," THIS IS ALREADY DONE! (See Plan direction below.) All these characteristics of the OG stands have been measured and entered into the San Juan's old growth DATABASE. You do not need to re-invent the wheel, although you may need to verify the info in the database. It's possible that a stand has changed since the OG inventory.

From the SJ LMP --- 2.2.74 Prior to any proposed agency actions on forested lands or woodlands, the affected stands should be screened against the current SJNF old growth database in order to determine their old growth status. Within landscapes not meeting desired conditions for old growth, ponderosa pine forest stands and mixed conifer forest stands that currently are not in the old growth development stage, but that contain significant old growth attributes should be prioritized as old growth recruitment areas, largely based on tree age and distribution across the SJNF, and managed for their old growth values.

My last two general comments ---

The entire HD's area is already a vegetative "island." Additionally, the old growth in Goose Creek is a separate "island," with natural open buffers around it. The area does NOT pose a risk of catastrophic fire that would threaten human communities. I see no reason to "treat" this entire Project Area.

FYI - Regarding goat grazing: back in the 1970's, the Ft. Lewis Ag Station/Experiment Station tried using goat grazing as a tool for control of oak. It was determined that without intensive, daily management, the goats destroyed large oak trees (by climbing them!) and destroyed much vegetation in areas that didn't need this treatment. The experiment was deemed a failure.