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Mr. Matthew M. McCombs
Attn: Pam King
Gunnison Ranger District
216 N. Colorado
Gunnison, CO 81230

Subject: Wilder-Highland Project
Date: February 20, 2020

Thank you for the opportunity to comment on the proposed project. I am requesting that the Forest Service limit the scope of this approval to the Wilder Infestation. Regarding the areas to the south that are not infested, I am requesting that the Forest Service defer action and provide more specifics regarding the intended stands and methods. There is a huge difference between "clearcutting" and commercial mechanized logging and selective hand thinning. Yet that range of possible action without specificity is proposed. By addressing the Wilder action separately, the immediate concern is addressed. I do not support going beyond Wilder to including the large unaffected southern end of the National Forest land in this project where large scale infestation die off has not occurred. The FS and adjoining owners in the Wilder area are commended for addressing the localized outbreak. I request it be considered as a separate action that then more fully aligns with the section 603 authority noted to authorize this project.

Specifically: Beyond the Wilder outbreak, the proposed project includes an additional approximate 6 x 1.3 miles tract to the south allowing a wide range of logging treatments including commercial clearcutting and mechanized logging on the uninfested Forest Service areas that have been noted by FS staff as not even in the likely beetle flight path. The project limits include several square miles of uninfested forest to the south without defining the stands, specific methods, and accompanying impacts.

I propose the NEPA Action be split into two separate and distinct actions each with what are currently differing purposes and needs. Urgency and known infestation was noted several times in the public meeting, yet NEPA does not specifically allow urgency as a sole basis for incomplete evaluation, and thus my recommendation to more narrowly limit the project the most urgent area. This collaborative recommendation allows urgent achievement of the Wilder goal while then separately defining the project in the unaffected areas to the south.

Action 1 Wilder: Proceed asap and implement the proposed actions regarding the Wilder outbreak with significant sensitivity and consideration of the adjoining landowners. This would

follow strict interpretation of the section 603 categorical exclusion authority noted in Title VI of the Healthy Forest Restoration Act of 2003. This area is essentially the north end (basically where FR 743 turns north and runs down Fisher Ridge.) As noted in the public meeting and also in the research provided by the High Country Conservation Alliance, removal actions are not proven, yet this allows the “we tried to do something” effort to proceed asap. The State Forest Service could then continue to work proactively with property owners on localized thinning which are likely to be less commercialized and avoid large scale public impacts.

Action 2 Uninfested South End: Define the project and evaluate the more expansive Forest Service tracts to the south of Wilder as a separate EA. The proposed action for the uninfested southern areas is open ended. There are numerous questions related to such an unclear range of actions up to and including commercial timber sales and clear cutting just in case. The proposed action is a map with no specifics. The southern area is not suffering an epidemic level infestation and the purpose and need is in question. The more aggressive timbering actions, viable on the larger FS tract in blue, essentially result in “we’ll remove the trees and clear the landscape, just in case the beetles might do that on their own some day”? The logic fails.

Prior to authorizing a clear cut or commercial type action on public lands to the south of Wilder in an area that is not suffering infestation and acknowledged as not the most likely flight path from the current infestation, there are many questions that should be answered. As it stands the staff was not able to specifically answer basic questions such as: Is the Forest Area in Blue on the South End targeted for a preemptive clear cut or large-scale commercial action?

Other considerations include:

- Wildlife – The Elk historically migrate out of the fossil area directly through the southern area in blue noted. They then stage on the hill and migrate west to the lower wintering grounds and or then over to the south. This narrow historic migration corridor overlays the potential clearing noted in blue and is the gateway from the upper habitat to the lower habitat. In addition, the lower end of the road 743 including main line haul roads are directly through known Gunnison Grouse Licks.
- Roads- what level of mainline road improvement is needed and or anticipated to support commercial logging activities. How does construction of new roads and extending seasonal and vehicular access effect broader recreational use. Some indication of the type and scale of upgrade and new road construction is needed.
- Temporary roads - 15 miles of temporary new road construction are noted. Where and what? How will the public’s use of these roads be managed and enforced with understaffed agencies having no chance to enforce?
- Water – Water is a precious resource in the Gunnison Valley. What is the public thought on using it for dust abatement for timber activities that may or may not work in an area that may or may not ever be affected by the beetle? How much water is planned for use and from where?
- Social Economic, Recreation and Hunting: Hunting is a major economic driver for Gunnison. Unit 55 more broadly and the Lost Canyon area more specifically is a destination for hundreds of hunters August through November. Specifically it is the exact overlap of the proposed timber cut in blue and the historic wildlife movement that exacerbates this concern.

- Inconsistencies in Purpose and Need particularly as it relates to the healthy areas to the south. To expand the Wilder project scope to include the healthy public land to the south to further enable the possibility of commercial logging seems an overly broad interpretation of staff level authority. Regarding the uninfested south end, the science does not fully support a certainty of outcome, yet the certainty of the resulting negative impacts is 100%. At the public meeting staff struggled to cite definitive results elsewhere, or science that supported the proposed project approach. The prevailing winds are to the NW from Wilder as noted by the staff, yet the targeted area of largest uninterrupted Forest Land and that most likely for Commercial and Clear-cut activities is to the south.

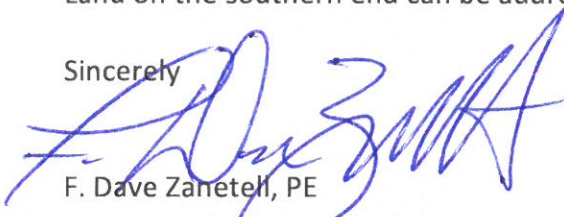
Combined Localized Action: In conjunction with the separation of actions note above, I support your recommended local property owner coordination and action with the Colorado State Forest Service. Thank you for collaborating with the State Forest Service to secure funds and efforts towards small scale forest health in targeted ways with the local property owners who own a combined majority of the land in the area. A significant portion of the southern project area is on small private lands (40 acres typically) and not typically expansive large tracts. By encouraging the State Forest Service initiative with the local landowners it seems many of the management objectives can be achieved while essentially eliminating the many undefined negative impacts of the larger public land effort shown in blue to the south. On these smaller properties many of the more moderate and less impactful methods such as targeted thinning, mistletoe targeting, and small clearing methods would likely result. None of these private and small-scale efforts would result in any larger scale or broad landscape clear cutting, wildlife corridor altering, social economic impacts, road reconstruction and long-term effect to the historic access and recreational use of the area. With strong private action as you noted, my hope is the need for the larger scale clear cutting and commercial logging type action included proposed on the south end could be averted. Thus, those private landowners and the State Forest Service who have mobilized can initiate and their efforts may serve as the buffer to the larger forest to the south.

I have read the technical research information posted by the High Country Conservation Advocates and support their cautionary comments as well.

Lastly – Thank you to your staff and specifically Ms. Pamela King. It was my hope to also discuss this more in person with you but based on the tight timeline it is my desire to ensure comments are timely, and on the record and yet also collaborate to offer a specific path forward.

I appreciate your consideration and would like to visit in hopes that my concerns re the Public Land on the southern end can be addressed. I can be reached at 303-881-1779.

Sincerely



F. Dave Zanetell, PE
20 FEB 2020

