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re: Southwest Blanco Wildlife Habitat Enhancement Project

I am submitting these scoping comments on the Southwest Blanco Wildlife Habitat Enhancement Project (SBWHEP). The scoping notice states:

“The Forest Service is proposing to conduct up to 14,121 acres of vegetation treatment over an approximate period of 15-20 years. Vegetation treatment would occur within a total proposed 37,810-acre project area comprised of four treatment units (map enclosed). The project would not exceed 500 acres of mechanical/hand/weeding treatments per year and 1,000 acres of prescribed fire per year, with the total combined treatments not to exceed 1,500 acres per year for the entire project area. There is no acreage limit on treatments that would not remove vegetation cover (seeding, planting, and disturbed site rehabilitation); however, these treatments combined are not anticipated to exceed 50 acres per year.”

So for this one project, the agency is proposing to disturb as much as 1500 acres per year for up to 20 years. This could total 30,000 acres of ground disturbance, which is comparable to disturbing an amount of land equivalent to 30,000 football fields. Nevertheless, in the scoping notice the agency asserts this would be such a minor project no NEPA analysis is needed:

“Based on resource information gathered to date, it is anticipated that this project falls within a Forest Service category of actions under 36 Code of Federal Regulations (CFR) § 220.6 that may be excluded from further documentation in either an Environmental Assessment [EA] or an Environmental Impact Statement [EIS]. Scoping comments, along with complete resource analysis, will determine whether this project can be categorically excluded. The proposed project is consistent with category 36 CFR 220.6(e)(6)- *Timber stand and/or wildlife habitat improvement activities that do not include the use of herbicides or do not require more than 1 mile of low standard road construction.*”

It is astonishing the Forest Service is even considering passing this project off under a Categorical Exclusion (CE). There is no plausible basis for concluding a project that does this much ground-disturbing activity over such a long period of time would not have any significant impacts on the environment. It should not even be authorized under an EA and “Finding of No Significant Impact”, much less a CE.

Therefore, I am requesting the agency initiate a full EIS for this project to evaluate and disclose the potentially significant, direct, indirect and cumulative impacts of the proposed action. In particular, the EIS should analyze and disclose impacts associated with fragmenting the forest by “creating a mosaic of vegetation conditions.”

As for the project's justification, the scoping notice states:

“The purpose of the project is to improve wildlife habitat by creating a mosaic of vegetation conditions and manage fuel loading within mountain shrub and aspen vegetation communities. There is a need to increase the younger age classes and early structural stages of vegetation, as well as reduce fuel loading in mountain shrub and aspen vegetation communities within the project area to achieve the desired 60:40 forage to cover ratio. The current condition of vegetation is not providing optimal forage and cover opportunities for elk, deer, and other wildlife species that rely on a diversity of vegetation age classes and structure. These mature stands lack new growth as well as forb and grass diversity in the understory which are a desired forage component for elk and mule deer. Mature and decadent vegetation also contribute to fuel loading which may increase the intensity of unmanaged fire effects if a wildfire were to occur in the project area.”

“Forage habitat within the SBWHEP project area is most associated with vegetation communities that are dominated by grasses, forbs, shrubs, and early-stage aspen stands. Cover habitats are most associated with forest cover that has 70-75% canopy closure, including aspen stands once they have reached the sapling-pole stage. As currently mapped, the habitat types across the project area are on average 40% forage habitat and 60% cover habitat, as opposed to the recommended 60% forage and 40% cover. Less than 1% of the aspen in the project area accounts for forage habitat. Limited vegetation management activities and natural disturbances within the project area in recent decades support observations that much of the current aspen has reached structural stages that can be classified as cover habitat.”

There are several problems with this reasoning. First, the USFS has managed National Forests throughout the region in ways that have artificially inflated the populations of elk and deer. This has resulted in increases in serious motor vehicle accidents due to collisions with these large animals. It also increased impacts to private lands when these animals move off the National Forests in the winter months. If the agency elects to pursue this project, the EIS should fully evaluate how the contemplated vegetation treatments would contribute to these problems. This should include an estimate of the number of people who may be seriously injured or killed in vehicle accidents (particularly between Meeker and Rifle and along I-70) and from deer or elk collisions around the project area over the next 50 years.

Second, in asserting the area currently has “40% forage habitat and 60% cover habitat” ignores the existence of grass and forbs that occur in forested areas that also provide cover habitat. The ground in forested stands is not bare; it is covered in vegetation that elk and deer utilize. In addition, the project area itself already has extensive grass / forb areas. See attached satellite image of the project area. Is the USFS seriously trying to argue more grass / forb habitat is needed in this area? If the agency properly accounts for this existing vegetation, the project would lose its justification.



Third, managing the National Forests in the region for high forage / cover habitat ratio has caused declines in the populations of species associated with interior forest and late successional habitats. It is ecologically irresponsible to manage the National Forests for species that are common at the expense of species that are rare and declining. The EIS should evaluate how the project could impact vulnerable species that utilize older successional habitats and complex understory habitats.

Fourth, the stated 60:40 objective ignores climate disruption and changes it is causing to the forests in the Rocky Mountain region. Warmer, drier conditions have been contributing to larger and more catastrophic wildfires, as well as increased tree mortality from insects and other causes. These changes are already creating more forage habitat and less cover habitat. The EIS should evaluate these changes, with projections for 20, 40, 60, 80, and 100 years in the future. This analysis will likely show the project isn't needed and could even cause this forest to shift beyond the 60:40 forage/cover objective. If you think this isn't possible, I suggest you take a look at current conditions on the Black Hills National Forest, where excessive logging, coupled with fire and beetle outbreaks, have radically changed conditions throughout Forest and caused the logging program there to become non-sustainable, in violation of federal law.

Finally, NFMA requires each Forest Plan to be revised every 10-15 years, so this project would last longer the legal life span of the Plan it is authorized under. To address population declines of interior / late-successional species, it is possible the agency will eventually revise the 60:40 ratio objective downward to preserve more habitat for those species. In any event, the agency should not authorize a 15-20 year project affecting tens of thousands of acres based on an objective in the current Forest Plan that will soon be replaced. If the agency elects to pursue this project, its lifespan should be limited to the anticipated life of the Plan, and certainly no more than the 15 years specified in NFMA.

Regarding the potential impacts of this project, beyond the ones discussed above, please ensure the EIS properly discloses the following:

- * Do any lands in the project area meet the criteria of potential Wilderness or roadless, regardless of whether or not the USFS has recognized them as such in past inventories?
- * If any lands in the project area are roadless or potential Wilderness, how would the proposed activities alter these qualities? ... and what steps will the USFS take to minimize these impacts and preserve the roadless / Wilderness qualities?
- * Are any of the lands eligible for RNA designation? The project area has some unusual features and vegetation complexes that I believe should be included in the nation's RNA system. If some lands are eligible for RNA designation, would the project activities foreclose this option? ... and what steps would the agency take to minimize this impact and preserve the RNA option?
- * What is the current state of habitat fragmentation in the project area and how would the proposed activities alter this? The EIS should evaluate habitat patch size, distance from edge, distance from roads, and patch isolation (e.g., patch-to-patch proximity and connectivity).
- * What are the likely atmospheric carbon emissions from prescribed fires and vehicles used to carry out vegetation management activities?
- * Regarding vulnerable species, the EIS should not issue unsupported assertions such as "the project may impact individuals but is not likely to impact the population." Such statements are indefensible without reliable estimates of (1) the number of individuals that could be impacted, and (2) the size of the population or meta-population. Please include this information in the EIS.

Thank you for considering these comments.

DJ Duerr