



July 16, 2014

Matt Janowiak
Columbine District Ranger
67 Pearl Street
Bayfield, CO 81122

RE: Fosset Gulch/Northern HDs Ecosystem Restoration Project Draft EA

Dear Columbine Ranger District Staff,

Thank you for the opportunity to provide comments on the Draft EA for this forest project. We appreciate the effort that was invested in producing the EA and find most of the project descriptions to be sufficient and in sum they provide a thorough overview of the proposed action.

In sum, we have no specific or overall objections to the EA and our comments focus on two issues that are inherent elements of the project related to biomass removal balance and roadless issues.

We appreciate and understand the flexibility noted in the EA regarding the possibility that a reduction of biomass/fuels within the project area may include removing biomass with a “chipping” operation such as utilized by Clean Forest Energy of Pagosa Springs. If this type of operation is utilized, we believe it’s essential that specific and details attention be given to the relative percentages of biomass that is either removed or left in the forest. As we all know, there is considerable variability and difficulty in calculating these relative percentages, but we believe it is a key element of establishing increased resiliency to the forest – leaving behind “too much” fuel would fail to meet a desired outcome, however, the removal of an excessive amount of biomass would negatively impact the health and resiliency.

As there appears to be some discrepancy in the research regarding the optimum numbers related to biomass removal vs. “remains”, we would recommend that the outcomes of projects elsewhere on the San Juan National Forest, and particularly in the Pagosa District, be continually assessed and utilized as a reference as this project proceeds forward over the years. Certainly there is tremendous variability between specific locales (forest type, aspect, hydrology, soils, etc.), however, we are confident that much can be learned locally and in turn be applied to this project. We are hopeful the agency will continually approach this project with “learn locally and then apply” thinking.

The Colorado Roadless Area (CRA) within the HD’s is a high value region for many reasons and therefore should receive an “extra dose” of respect during project operations. We are pleased to see that the temporary roads approach to CRRA entry has morphed to over-the-ground vehicle use because this will most like result in a decrease in negative impacts for many forest resources. Due to the importance of the increased protections given to the CRA’s we recommend the agency highlight the need to inform contractors working in the Roadless Areas of the necessity of following the specific operational protocols that will be in effect. As well, ongoing monitoring of such work in the CRA’s is imperative.

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We would appreciate being kept informed as to the initiation and progression of this project and would suggest the Columbine District host field trips to treatment sites with the aim of informing the public of project operations and outcomes.

Sincerely,

Jimbo Buickerood
Public Lands Coordinator