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Comments:
Pg 6 of 16; #3 in numbered list of 'desired forest structure, 'site index' is listed as one of the criteria that would be used to determine tree density-site index not a 'common knowledge' term, and should be defined.
Pg 7 of 16, Figure 2: needs a key to define the different shades of gray (I assume these may represent either different forest types or different species, depending on scale of the component of the figure shown).
Pgs. 11-16 Proposed Action:
*   The proposal is to do 'condition-based treatment', and at the bottom of pg 11, it says: ".the Forest Service would identify specific treatment units and prescriptions based on site specific conditions. Treatments would be guided by landscape features (what we find on the ground)." It then says "..Once a set of landscape features is identified, we would then identify the types of treatment tools, design criteria, and any applicable resource protection measures that we could use to treat those features." However, many of the landscape features specified as being needed to define treatments (e.g., cover types, slope, scenic sensitivity levels, or threatened and endangered species habitat) can be defined at the regional scale of this project using GIS. Using GIS, it is easy, for example, to define slope characteristics, and thus to delineate the areas where no mechanical thinning would be used (i.e. on slopes >40%). It also would be easy to delineate the general areas of each forest type, so the general pattern of major cover types, and therefore of types of required treatments, could be shown. I strongly recommend this be done. I appreciate the desire to have flexibility; however, the types and range of flexibility needed in each major cover type can be indicated, while still giving more clear information on where treatments would be done. Historically, NEPA has required project actions to be clearly specified, and the concept of putting a 'condition-based' treatment project through NEPA has not really been tested, and I suspect it will be challenged. Using GIS to mapped areas where each type of cover occurs, and being more clear about what treatments will be used based on other key conditions within those cover types such as slope, would address this concern.
Pg 12: Ponderosa Pine & Dry Mixed Conifer (up to 14,000 acres)
*   The section on treatment says that trees less than 12 inches dbh would be targeted, but that trees up to 24 inches dbh could be cut. During in-person discussion, the district rangers presenting this project indicated larger trees between 12-24 inches dbh would only be cut under limited circumstances. I strongly suggest that prior to initiation of this project, the particular circumstances that would justify the cutting of any larger trees be explicitly defined, and that associated decision criteria be specified and reviewed by a stakeholder group. This would help get buy-in, and assure stakeholders that there are, in fact, definable limits to when larger trees would even be considered for cutting, and that this is based on need and science.
Pgs 12-13: Treatment: Noncommercial mechanical and hand-thinning treatments
*   Every subsection (by forest type) indicates cut material would be either lopped & scattered or piled. Your own documentation of the science indicates that piling cut material INCREASES fire risk. Since this goes directly against the objectives of this project stated in this scoping document, I strongly recommend that realistic options for disposal of the piles, as well as alternatives to scattering 'fire wood' across the forest floor, be defined, including decision criteria. I recognize that pile burning is mentioned in the next section (prescribed fire). However, we know from previous projects (e.g., La Cueva) and from common sense that there is a high probability that after cutting is done, the piles will not be able to be burned due to prevailing weather conditions. Leaving piles for multiple years is an unacceptable risk; therefore, a realistic process and decision structure needs to be generated and included in the project plan.
*   Table 3: for Ponderosa pine and dry mixed conifer, the table indicates that 14,000 ac will be treated with a mix of thinning and burning, and 22,000 will be treated with only burning. That totals 36,000 acres, whereas Table 1 shows there are only a total of 35,678 acres of these 2 forest types combined. This suggests that 100% of these 2 forest types within the project area will be treated. Overall (the Total line in Table 3), up to 43,000 ac of the 50,000 ac project area (86%) will be treated. The project intention of treating 100% of the 2 dominant forest types is hidden in this table and has been de-emphasized in the public meeting presentations. In addition, it seems to be in conflict with the stated objective of project resulting in a matrix of patches of different endpoint habitats (e.g., stands of different ages, mono-age stands, open areas, etc.). This should be clarified in the scoping document and any future project descriptions.