

January 27, 2016

To Whom It May Concern:

The Forsythe II plan is just as flawed and misguided as its predecessor, the Forsythe Plan, which was scrapped as a result of its false premises, incorrect and misconstrued “facts,” poor and antiquated scientific justification, dismal execution, and cavalier disregard of required procedures in 2014.

As a founding member of Magnolia Forest Group NFP, a group of concerned residents made up of conservationists, recreationists, hunters, fishermen, veterans, foresters, firemen, and accomplished scientists, and as an 18-year resident of Lazy Z Road, I am surprised and disappointed that Forsythe II is so similarly flawed to the original Forsythe Project.

Dozens of my friends and neighbors have participated in numerous meetings and field trips over the last 18 months with USFS personnel (Sylvia Clark, Kevin Zimlinghaus, Cambria Armstrong and Reid Armstrong to name a few) in an effort to collaborate on what is best for our forest. The USFS asked for our participation in an effort to restore some of the trust and good faith that was lost during the original and aborted Forsythe Project. Our community has collectively submitted hundreds of e-mails which have included thorough outlines of our opinions, concerns, treatment recommendations, scientific references, and a comprehensive alternative plan.

To this point, it is hard to identify the incorporation of any of our ideas. To say this is frustrating is an understatement.

A few points worth noting:

The Forsythe Plan was fundamentally a “fuels reduction” plan. The Forsythe II plan is being paraded under the banner of “forest restoration.” Restoration and fuels reduction are two completely disparate objectives, yet the prescriptions for treatment are hardly distinguishable.

Restoration is defined by Webster’s Dictionary as:

- the act or process of returning something to its original condition by repairing it, cleaning it, etc.
- the act of bringing back something that existed before
- the act of returning something that was stolen or taken

The Forsythe II plan does not deign to describe or even mention (i) the “original condition,” (ii) what “existed before,” or (iii) “what was stolen or taken,” scientifically or philosophically, with respect to the proposed project area. That is the only natural place to start for a “restoration” project.

In addition, it would also be helpful to know why it is in the best interest of the forest to “restore” it. Lastly, why is the forest not in its original condition?

In the recent meeting on January 11th, 2016 it was mentioned that although Forsythe II is now being justified as a “restoration” project, fuels reduction and wildfire protection are also part of the purpose and need for the project.

A few points to consider, that based on the current available science, cannot reasonably be disputed:

1. Patch cutting (clear cutting) does not protect us from forest fire; rather, it makes the situation worse. The fire ends up taking a wider path and travels faster.
2. Grass fires are just as catastrophic, if not more so, than timber fires.
3. Forest thinning, unless done on a very regular basis, does not protect us from forest fire; rather, it makes the situation worse. The Forest Service admits that it does not have the manpower, money, or resources to thin on a regular basis. Thinning dramatically increases ladder fuels, which can turn slow-moving ground fires into devastating crown fires.
4. The best defense strategy against forest fires is to (i) leave the forest intact; and (ii) encourage and incentivize property owners to create proper buffer zones ("defensible space") around their property.
5. In high-wind fire situations (which constitute virtually all of the catastrophic fires in this area), it is probable that no treatment will have any impact. For example, in the Four Mile Fire, there were reports of embers blowing two to five miles. The Forest Service's internal review of the Four Mile Fire concluded that none of its fire mitigation practices had any noticeable impact on the fire's intensity and severity.

In sum, what the Forest Service has already done and is planning to do in Forsythe II in the name of "fire mitigation" is actually increasing fire danger.

I have attached two documents that address many of my concerns and of which I am in full support. These both meet the purpose and need of the Forsythe II project and are demonstrably superior alternatives to the current proposal:

- Guidance and Treatment Changes Bullet Points
- Magnolia Forest Group, NFP Forsythe II Alternate Plan

I have done my best to understand the parcel boundaries, but in case I have misunderstood any of them, I respectfully request that the USFS provide me with the GPS coordinates of all boundaries in the project as soon as possible.

Based on my interpretation of the parcels, I have specific concerns regarding parcel numbers 43, 39, 76, 42, 45, 47, 48, 49, 68, 73, and 74.

Parcels 43 and 75. These parcels have been recently thinned and much of the regeneration and ladder fuels are a direct result of this thinning. There is significant age diversity throughout these units as well as species diversity. This is prime Canadian Lynx, Mountain Lion, Black Bear, Moose, Elk, Deer and Bobcat habitat (to name a few of the larger mammals). There are raptor nests, including but not limited to: Goshawks, Red Tailed Hawks, Peregrine Falcons, Golden Eagles, Great Horned Owls and dozens of songbird species. The only treatment if any that should be done is removal of the downed trees, removal of standing dead trees, and possible cutting of some ladder fuels. No mechanical cutting of any kind should be done. The road should be obliterated and returned to its natural state. In addition, the noxious weeds that thrive as a result of the road must be addressed.

Parcels 68, 76 and 42. These parcels are inholdings within 43, 75 and 45 and have the same ecological importance. All that should be done is removal of downed trees and cutting of any dead standing trees. If any treatment is deemed necessary, it should be done without any mechanical cutting.

Parcel 45. This unit has been thinned in the recent past. It is excellent wildlife habitat and contains all of the species mentioned in the summary of Parcels 43 and 75 above. All that should be done is removal of dead trees on the ground and standing dead trees.

Parcels 48, 49, 47, and 73. These parcels are of the same ecological significance and there is significant age diversity across these parcels. They have been thinned in the recent past and these areas have good spacing and a diversity of species. All that should be done is removal of dead trees by manual means.

Parcel 74. This two-stage proposed treatment is flawed. If the downed trees cannot be removed without cutting or destroying the healthy trees, then this whole unit should be omitted from treatment.

Parcel 39. I believe this parcel was treated during the Winiger Ridge project and should not be treated again. All that should be done is removal of remaining slash piles and dead trees.

The 16-inch diameter at chest height criteria is ridiculous, as there are very few trees in the project area that are this large. In the original Forsythe Plan the criteria on the task orders per my recollection was trees over 11 or 12 inches would be saved. Why suddenly the change to 16 inches, which would dramatically *increase* the number of healthy trees cut?

I was at times encouraged by a few of the meetings we had over the last 18 months in which the social aspects of the project were not only discussed, but acknowledged by USFS personnel and affiliated experts from the Nature Conservancy, CSU, etc. as vital components to the planning process. It was indicated to us on many occasions that these social and community factors were going to be given strong consideration. To this point, I have seen no such indication.

Similarly, I find the timing of the scoping period strangely disrespectful. Why would a government agency choose to start the clock ticking the week between Christmas and New Years? 30 days is not nearly enough time in the first place, and most folks including myself lost at least one if not two weeks due to this lack of consideration, although I am aware that it technically satisfies the USFS's minimum legal requirements.

I also find it incredible that the USFS plans on completing a comprehensive Environmental Analysis in 60 days. Is that really enough time to gather all of the relevant science and expert opinions, to evaluate all of the opinions, weigh its alternatives, and construct a document that includes a recipe for precise execution, accountability, and success? The Supplemental Information Report for the original Forsythe Plan took longer than 60 days and all that report was tasked with was reviewing an existing plan to see what was incongruous.

What is still unclear to me is why the USFS is so intent on cutting the majority of healthy trees down regardless of the purpose? Is it jobs, funding, private interest? It would be good to know. Is there not a better way to spend tax payer dollars?

What is becoming clearer to me is that the USFS is going to try and cut healthy trees and lots of them – whether in the name of “fuels reduction”, “fire safety” or “forest restoration” it doesn’t really matter, and frankly it doesn’t seem to matter if it does any harm or good.

In summary, the current Forsythe II plan should be terminated immediately as it is an outrage. It plans to irreversibly destroy treasured areas of Boulder and Gilpin County. It is increasing fire danger and putting lives at risk, devastating wildlife habitat and cherished recreational areas, jeopardizing the watershed and increasing flood risks while ignoring the social impacts.

Lastly, and possibly the most enraging point, is that despite consistent public outcry by the majority of the community, the USFS continues to place its own slash-and-burn agenda, as well as the interests of Denver Water and Xcel Energy (to name two of the primary corporate interests involved) high above the opinions and desires of the public.

I was intent on putting a stop to the original Forsythe Project, and I intend to do the same to Forsythe II unless there are significant changes in favor of conservation and the proper consideration of local concerns. Please be advised that dozens, if not hundreds, of my neighbors and friends feel the same way.

Sincerely,

Todd Adelman
1890 Lazy Z Rd.
Nederland, CO 80466

Cc: Benjamin M. Wilson, Esq.