

Guidance and Treatment Changes

Forsythe II Project - Information & Guidance

- **Support the MFG alternate plan over the USFS scoping plan.**
- **Coordinating with residents to create safe zones 100' around houses is a good thing and also investing in firefighting facilities, equipment, manpower, and improved response times.** Much current science indicates that patch cuts for fire mitigation have the opposite effect than intended. On the other hand, homes with 30' and 100' mitigation zones can survive crown fires.
- **Surface and ladder fuels created by previous thinning are in need of reduction in some areas.** Many papers published by the USDA FS, indicate that the "most effective strategy for reducing crown fire occurrence and severity is to (1) reduce surface fuels, (2) increase height to live crown, (3) reduce canopy bulk density, and (4) retain large trees of fire resistant species" in that order. Also, bear in mind that reducing canopy density has the effect of increasing surface regeneration.
- **The latest science indicates that thinning in this area at this elevation and vegetation type will have no benefit in terms of fire mitigation.** The open forests and low frequency fire regime cited by the USFS is applicable to lower altitudes (<7000'). This area of higher elevation and steeper slopes is not suitable for that type of forest and fires here are more dependent on weather (wind, heat, drought) than on fuels. Widely spaced trees and even aspen stands will burn in this upper montane zone with crown fires, given the right weather. This is the type of fire we experience here. The upper montane zone vegetation type is Lodgepole, mixed-conifer, and Ponderosa, along with a variety of shrubs and is the type of vegetation in the Forsythe units. This is an upper montane vegetation type.
- **Forest restoration should not include converting an upper montane zone into a lower montane zone. Patch cuts and clear cuts in lodgepole pine do not restore the forest to any natural state.** See above. USFS project proposal appears to be trying to convert this upper montane zone into a lower montane vegetation type, with widely spaced Ponderosa pine. That is contrary to the actual vegetation type, terrain, and weather patterns found here and can in no way be considered "restoration". Lodgepole pine are found in large, even age stands. Yes, different hillsides may have a different age stand and there may be a few patches of uneven aged lodgepole within an area, but not many. You have already created considerable amounts of clear cut and patch cut areas in this area to create uneven age stands. More cuts at this time will just create another cycle of dense, even aged stands, or an unnatural hodgepodge of more fire prone uneven aged trees.
- **Thin the regenerated pine now, before it gets older.** Thinning lodgepole pine at ~age 12-15 allows them to develop stronger root systems and resist blowdown later. It can also produce variable stands with some thick clumps and some spaced a little further apart (they still shouldn't look like an open ponderosa forest). They should still be closed canopy, but thinning will increase their vigor and growth.
- **We suggest no manipulation to select for particular species.** The effects of climate change on the forest cannot be accurately predicted for any given area. Overall global warming does not mean that we will necessarily see immediate warming here. The local effect could be cooler and wetter even as other areas get hotter and drier. Simply cutting for a Ponderosa forest will not create one. The trees that will regenerate on north facing slopes will in all likelihood be Lodgepole and Fir. Better to have mature, tall trees than a slope of small ones for fire mitigation purposes. Nature does a better job at selecting trees for changing conditions than we can hope to do.

- **Slash needs to be removed and no more slash produced until the backlog is burnt or otherwise dealt with.** Removing the overstory and placing it on the ground in slash piles, or lopped and scattered, does nothing to reduce fire hazard. Producing more piles than can be dealt with in a year is counterproductive. Leaving 2 slash piles per acre (sized a minimum 6'x6') is too much. The wildlife would probably benefit more by having the forest standing than in piles on the ground. There are already more slash piles in the district than can be dealt with in several years. <http://www.skyhidailynews.com/article/20100614/NEWS/100619985> and <http://www.containedburn.com/Products.php>
- **Any treatment should be designed for conditions on the ground including diversity of species, habitat, riparian & watershed protection.** This means leaving trees in the ground to hold and shade the soils to protect the watershed and prevent future flooding. Keeping thick forests (what few we have) for species that need them. It is hard to improve wildlife habitat, if you don't know the full diversity of species present and their needs. A variety of diverse habitats is best.
- **The proposal should be in accordance with the Arapaho Roosevelt Forest Plan!!** That means placing importance on scenic and social values, wildlife habitat, as well as preserving future old growth. No trees 12" or over should be cut.
- **We see no mention of the Gross Reservoir expansion. This could be a major development and its impact needs to be considered with any forest project and visa versa.** The issuance in April 2014 of the Final Environmental Impact Statement ("EIS") for the proposed expansion of Gross Reservoir represents a significant change of circumstances and impact on the area. Denver Water has contributed money towards this project, but we have seen no science that cutting the trees actually contributes more towards protecting the watershed than the occasional fire.
- **If any cutting is needed, it should be by hand, limited to a few areas, and should avoid disturbing wildlife.** Cutting between May and September is likely to disturb nesting birds, migratory birds, and elk calving, as well as attracting MPB into the area (during their flight period). Of course, many areas cannot be cut during the winter due to disturbing the Winiger elk herd.
- **Any Task orders need to be specific and there must be more supervision at all times. There must be a method of public recourse for task orders or trees marked that do not follow the EA.** Too much discretion is placed in the hands of the contractors. Too many changes happen to the project when it is time for the task orders to be issued.
- **Aesthetic, social, and ecological factors must be included!!** The way a forest looks is important to its inhabitants, both human and others. Most of us will not live to see a grown replacement forest in an area cut down. Most of the trees in this area are not grandfather trees; we have very little old growth. This area was razed in the 1800's, so most of the trees are only a little over 100 - young in tree life. Perpetual cutting guarantees we will never get old growth. If we include the effects of fire mitigation around homes (where it does make a difference), we have lost a lot of dense habitat. The patches of USFS land are the remnants of this type of habitat and we need to keep them to retain ecological diversity.