



January 3, 2019

White River National Forest
Attn: Shelby Limberis
PO Box 190
Minturn, CO 81645

Dear Ms. Limberis,

Please accept this letter as formal comment for the White River Forest Health and Fuels Management Project and thank you for the opportunity to comment on this project. The Town of Vail would like to formally support this proposed action with consideration for the comments below. The Town feels that this unique approach of a forest wide analysis is a good way to address long term forest health and fuels management projects. The Town supports proactive management of the National Forest System Lands which provide a substantial portion of the tourist attraction to the Town.

1. Consider expanding the boundaries of the proposed action to include the areas adjacent to previously treated units. This is of particular concern within the designated WUI areas. The areas between many of the previously treated areas contain large volumes of wildfire fuels and areas of unhealthy forest stands.
2. Similar to the previous comment the Town would like to see consideration for the development of a standard forest wide prescription for extension of defensible space from the non-federal land onto the federal land. In many places across the forest home have been developed within close proximity (less than 30 feet) to the National Forest Boundary. This development does not provide adequate room for private property owners to modify fuels on their own property. Having a standard prescription for extension of defensible space on National Forest System land would allow willing property owners to adequately protect their home from a wildfire coming from USFS property while also providing a level of protection of the forest from fires originating on private property. Often times when private property owners have the motivation to create defensible space they do not have the patience to wait through a typical environmental assessment for their small project. A standard prescription could decrease administrative work on the USFS while fitting into the attention span of a private citizen.
3. Several sections of the proposed action reference a cap of 1000 acres forest wide per year. While this seems like a relatively high cap, in actuality it is a very small fraction of the overall size of the forest and number of previously treated acres. The town would suggest rising to cap to

a higher number. Raising the cap would allow for quicker treatment of forest wide issues and potentially take advantage of magnitude of scale to decrease treatment costs. The White River National Forest is one of the largest single forests in the nation (2.3 million acres). 1000 acres per year would allow of maximum of 0.5% of the forest to be treated annually.

4. The standard prescriptions for precommercial thinning of regenerated lodgepole pine stands are well thought out and supported by substantial science. The prescription for thinning within the WUI contains a variety of slash treatment options. Substantial consideration should be given in selection of slash treatment options. The options of lop and scatter and mastication, while cost effective, could substantially increase wildfire hazard until that material has sufficient time to decompose, which could be decades. Use of methods such as mechanical removal and pile and burn will decrease wildfire risk.

The Town would like to thank you for the time you have taken to fully analyze this project. If you have any questions regarding these comments please direct them to:

Paul Cada
Vail Fire and Emergency Services
Wildfire Program Administrator
970.477.3475
pcada@vailgov.com

Regards,



Greg Clifton
Town Manager
Town of Vail