

Forest Health Task Force

Comments on Peak 7 Hazardous Fuels Reduction Project



The Forest Health Task Force (FHTF) created the following comments on the Peak 7 Hazardous Fuels Reduction Project. In order to be certain that these comments represented the consensus opinion of our group, we surveyed 65 FHTF regular meeting attendees individually, asking for review, comments and support, or not support. 46 people responded. Of those people responding 8 stated that they were commenting through other entities and had no additional comments through the FHTF. Of the 38 people wishing to comment through the FHTF, 36 (95%) were in support or strong support of the comments below, while two responses (5%) would have changed our comments in a different direction. We appreciate all the responses and vast majority of support that we received, and present the following comments as representing the Forest Health Task Force members and network.

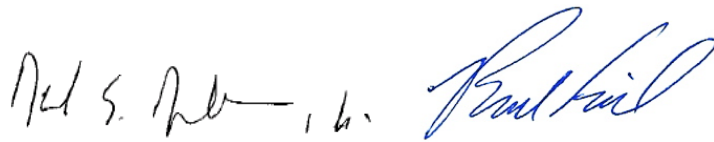
The Forest Health Task Force is in support of the Peak 7 Fuels Reduction Project. We offer the following comments as measures which will, in our opinion, improve the project, helping to assure that long-term Community goals are met.

1. Long-term management strategy – We request the creation of a written, long-term management strategy specific to the designated Peak 7 Fuels Reduction Project area and other forest management projects in this area. This strategy should include stated objectives and guidelines for maintaining reduced fuel loading, improving firefighting access, enhancing aesthetic, recreational and environmental assets, mitigating noxious weeds and invasive species and improving carbon sequestration. We suggest that the area be monitored at 3, 5, 10 and 20 years after treatment to verify that the stated objectives are met and that, appropriate actions be taken to meet the objectives.
2. Irregular treatment area boundaries - A number of past management (clear cut) units have had straight lines at ownership boundaries. When units are clear cut, these boundaries become very noticeable and can create a negative visual impact. We suggest that, where there are clear cuts or larger patch cuts up against straight property boundaries, the edges be changed to match natural features, or at a minimum, be feathered into the adjacent property. Project boundary variations of 25-50 feet may be sufficient to mitigate visual impact while achieving fuel reduction and wildfire buffer goals.

3. Leave tree pockets - The proposal mentions that spruce-fir and aspen will be left where they are encountered. We suggest leaving pockets of live lodgepole pine, especially in areas where lodgepole occur with other tree species. These areas will increase age-class diversity and help protect spruce-fir from blow-down where there is already species diversity.
4. Thinning – Apply thinning as an alternative prescription in appropriate locations to achieve fuel reduction while enhancing age and crown diversity.
5. Aspen enhancement - Where areas with aspen are encountered, we suggest managing those areas to encourage aspen over other species. We also suggest follow-up actions in a few years after harvesting these units to determine if additional actions may be needed in aspen areas to reduce competition from regenerating conifers.
6. Reduce slash loading - We suggest that logging slash be kept to the low-end of standard guidelines to avoid leaving fuels on the ground and creating hazards for people traveling through the area. Reducing slash loading may also result in a decrease in burn piles, reducing air quality impacts. Identify slash standards being used along with supporting research regarding impact of slash levels on revegetation and wildlife.
7. Protecting recreational access and view corridors - There are a number of recreational trails within some of the units. The Peaks Trail, which is heavily used in summer and winter, runs through Units 134 and 349. The Burro Trail runs through Unit 122. The Blue River Trail runs through Units 340 and 341. The Golden Rule and Harum Trails run through Units 110, 111 and 112. Managing trail closures to minimize recreation user impacts will be important. Also, in the past, trails have sometimes not been adequately protected from damage during harvesting activities. We suggest a plan be created and communicated to the public to manage impacts to recreation and mitigate trail damage.
8. Criteria for treatment unit selection - The Purpose and Need has two components: 1) Provide a 400-600 foot CPZ on NFS lands adjacent to communities in the WUI that have been identified as having an elevated risk due to hazardous fuels; and 2) Reduce the impacts of a potential wildfire on forest resources and firefighter safety by breaking up the continuity of hazardous fuels over the long term. Some of the units (110, 111, 112, 124, 130, 134, and most of 122) are not close to houses or other structures. Please state in more detail how and why these units were selected and whether the objective is only item 2. State whether or not 400-600 foot CPZ will be implemented in these units. Referencing item 1 of our comments, please state the long-term management strategy for these units to achieve the intended objective of “break(ing) up the continuity of hazardous fuels over the long-term”.

9. Projects with private land owners - Some of the units that would have 400-600 foot CPZ adjacent to private lands would be in areas where the adjacent private lands appear to be heavily forested. We suggest that these CPZs be feathered into the private lands. We suggest proactive plans to work with the private land-owners and Colorado State Forest Service to treat adjoining private lands.

Thank you for your consideration,

The image shows two handwritten signatures in blue ink. The signature on the left is for Howard Hallman, and the signature on the right is for Brad Piehl. Both signatures are written in a cursive, flowing style.

Howard Hallman

Brad Piehl