



March 22, 2021

Forest Supervisor, c/o Brett Crary  
900 Grand Ave  
Glenwood Springs, CO 81601

Dear Mr. Crary,

Please accept this letter as formal comment for the White River Aspen 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 of Vail is keenly aware of the elevated risk of wildfire, declining wildlife populations and the overall decline of aspen vitality across the White River National Forest. We feel that this project will help to decrease wildfire risk to neighboring communities and infrastructure while simultaneously improving wildlife habitat in critical winter range. Please consider the following comments in making your decision.

Comment 1: The scale of this project does not match the rapid change in condition of the forest's aspen stands. The acreage limitations of 10,000 acres of mechanical and 10,000 acres of broadcast prescribed fire per decade will not adequately address the identified need. At this scale it would take 18 decades to treat all the potential stands identified in this proposed action. We would ask that you consider increasing the maximum allowable acres to levels that would appropriately address the identified need.

Comment 2: The proposed action unduly restricts treatment options within designated roadless areas, especially within the identified wildland urban interface. Many identified aspen stands exist within the overlay of designated roadless and wildland urban interface. Under the proposed action the only allowable treatment would be broadcast prescribed fire. Many of these stands would benefit from the use of this prescription but may not currently be in a condition that is suitable for burning without preparation cutting. Due to the complexities of burning near communities many of these potentially treatable and highly important acres would be overlooked in favor of treating areas further away from the communities simply because it is easier to complete. Additionally, smoke near communities is a growing concern when implementing prescribed fire. Slash treatment in the form of cut, pile and burn prior to a broadcast burn is a good treatment to reduce large fuel loads which become smoke management concerns when implementing future broadcast burns.

Comment 3: Much of this proposed action is focused on the removal of forest products for commercial timber production. It is well known that few markets exist within the rocky mountain region for the use of aspen logs. While marginally important to the region, this focus on production of forest product

detracts from the higher value of this project, wildfire risk reduction and wildlife habitat improvement. Greater emphasis should be placed on implementing this project to reduce fuels within the wildland urban interface and improve critical wildlife habitat.

Comment 4: Similar to comment 2, we feel that consideration should be given to allow for mechanical treatments within designated roadless areas. Sufficient road infrastructure already exists within many of the roadless areas to support mechanical treatment without product removal. Use of prescriptions such as weeding, and slash management could easily be accomplished without the creation of any new roads.

Comment 5: Slash management should also be considered for the treatment of existing dead and down within the aspen stands. Many stands affected by the sudden aspen decline over the past 2 decades have accumulated significant amounts of dead and down materials. This material represents a significant fuel hazard when it is adjacent to communities and typically drives fire behavior when wildfire enters the stand. Slash management should be considered as a stand alone treatment, not just a secondary treatment for post-harvest activities.

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:

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Wildfire Program Manager  
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Regards,

*Mark Novak /s/*

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Vail Fire and Emergency Services