

April 20, 2021

Forest Supervisor
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Dear Forest Service Colleagues,

I'm commenting on the Notice of Proposed Action for the White River Aspen Management Project. I want to emphasize three aspects of evidence, and one major concern about collaboration. My background and experience include: 40 years of working on forest ecology issues around the world, several major landscape-scale assessments of aspen age patterns, being the founding director of the congressionally authorized Colorado Forest Restoration Institute, and 15 years as the Editor-in-Chief of the leading forestry journal, *Forest Ecology and Management*. I'm providing this feedback on the proposed action to foster aspen on the White River; I'm not representing any group or the universities I'm affiliated with.

Aspects of evidence:

- The attached report recently published by the Western Landowners Alliance probably gives the best single-source for evidence-based assessment of present and future challenges of sustaining aspen in our region. The proposed action mentions browsing as a problem for aspen regeneration, but it seems incomplete and misses a key point. A not-very-vigorous aspen clone may have suckers that are browsed (and so limiting the apparent future of the clone), and the proposed action would plan to improve this situation by cutting (or burning). The evidence from around Colorado and beyond is that this may be a good idea, or it may lead to failure of the clone if browsing intensity is too high. Indeed, the proposed action is advocated in part as improving wildlife habitat – by providing more suckers to eat. No silviculturist would assume that a proliferation of aspen suckers would necessarily exceed the ability of elk (and other browsers) to consume them. Indeed, massive aspen suckering in southern Colorado and northern New Mexico (to the eastern side) after 10,000 acre+ fires could not outpace elk browsing. In other places, even patch cuts have produced enough suckers that elk browsing does not prevent regeneration. What proportion of the White River landscapes would respond like the first case, and how much like the second case? Clear evidence is needed before it would be wise to assume what will happen after cutting or burning on the White River.
- Evidence from across Colorado shows that virtually all SAD-affected stands have sufficient regeneration to lead to a new generation of aspen. BUT the level of browsing often (but not always) is too heavy to allow a next generation of aspen trees. Clearly it would be unwise to assume that a site with browsing so severe that a low-density of aspen stems do not transition into tree size classes would be “fixed” if the number of suckers is dramatically increased (that may be true, but often isn't – no single answer applies broadly).

- The widespread increases in Colorado fires since 2000 has dramatically altered the “need” for silvicultural approaches to sustaining aspen on landscapes. This is currently most apparent in Valles Calderas and Jemez areas of New Mexico, where a series of megafires led to extensive aspen regeneration across vast areas (but not across some others). The more recent Colorado fires are doing the same thing. It may not be logical to expect that fires (especially very large ones) will not be a dominant force shaping the White River forests in the next decade (and certainly next several decades).

Aspects of collaboration:

- The proposed action highlights goals of collaboration, but there is not much evidence that effective collaboration would develop. Consultation with stakeholders is good, but only an initial step. The forest restoration work on the Ouray District of the Grand Mesa, Uncompahgre and Gunnison National Forests was strongly collaborative, involving citizen science, and engagement with university scientists to examine questions raised by stakeholders. I’ll attach a journal paper with the results of the field work that aimed to answer the aspen questions raised by the collaborators. This took a fair bit of work, but it resulted in landscape-scale NEPA approval (without appeal), and the Chief’s Award for stewardship. The District Ranger was Tammy Randall-Parker (now the recreation lead on the GMUG) – she’d be a great source of insight on how collaboration can be harnessed to really improve the future forests of a landscape.

Thanks for working so hard to support forests of our future,

Dan

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