

Forest Health Task Force

Comments on USFS Proposed Swan Mountain Project



December 6, 2021

General

1. A significant, if not primary, cause of the increased severity and occurrence of wildfires is climate change, which has led to hotter temperatures and prolonged drought. Therefore, it is critical to maintain or increase forest carbon sequestration both long-term and short-term. We would request a carbon accounting of all the specific actions, including slash burning, and the uses of wood leaving the forest. In addition, we request a total project accounting comparing carbon sequestration potential if the project were not performed with carbon sequestration potential of the project as proposed.
2. The fact that 99% of homes in Summit County are located in the WUI does not mean that all of the proposed Swan Mountain Project area is within the WUI, or that the Swan Mountain project area should be high priority for wildfire hazard mitigation and fuels reduction. It is a high recreational use area for hiking and mountain biking. Reducing fuels in this area is less valuable than other areas located closer to towns or with greater housing density. Therefore, we believe that forest health should have greater consideration than fuels reduction in the Project area.
3. The trails in this area get very heavy use throughout the year. The activities adjacent to trails are substantial and the trail rerouting project is significant. We request that a comprehensive plan to communicate with trail users and minimize impacts be created and presented to the public for comment before implementation. Buffer corridors with thinning-only prescriptions should be considered along major trails.

Prescriptions and treatments

4. Clear cutting is proposed as the majority treatment, with over 1,700 acres. Clear cuts, especially larger areas, create homogeneous areas of lodgepole pine regeneration. These areas can and often are characterized by very dense seedlings that can grow into dog-hair stand structures. We see these dense seedlings after clear cuts in many locations through Summit County. We would request that all clearcut units greater than 20 acres use the patch clear cut prescription described in the notice. The greatest openings would be limited to 20 acres. The areas between the openings would be selected to contain live trees, preferring aspen, spruce, and fir. Areas of lodgepole pine would also be candidates for leave patches.

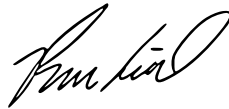
These leave patches would likely experience some blowdown in future years but would provide some diversity on the landscape which would increase species and age class diversity.

5. Large spruce-fir trees exist in pockets that are likely pre-mining era remnants and younger spruce-fir trees exist in locations that are on a successional pathway to either mixed conifer or spruce-fir forest types. These forest types take long periods of time to develop and clear cutting would reset them back to pure lodgepole pine stands. Identifying areas that have old and/or younger spruce-fir trees and buffering them from exposure to wind and providing some shade would provide increased forest diversity and resilience.
6. Patch clear cuts would reduce future maintenance/thinning that should be addressed in the assessment.
7. Some treatment areas have relatively straight boundaries which are esthetically and ecologically undesirable. We request that the boundaries be feathered and/or irregular as much as possible to reduce the harsh lines on the landscape.
8. We request that an additional alternative be created and assessed. This alternative would have the following features.
 - All clear cut units larger than 20 acres would use the patch clear cut prescription with openings limited to 20 acres. Some of these areas could also use a thinning prescription.
 - For areas that are proposed for piling and burning, as much wood and slash as possible would be removed and put to a long-term use to minimize the short-term carbon impact of the project. It could be difficult to determine an efficient method to remove the slash and will likely increase costs, but the value of a better carbon outcome has value.
 - Areas that have an aspen component would be the target of conifer removal with the objective to increase aspen on the landscape.
 - Along with the stream and wetland improvement projects that involve willow planting, identify upland areas that are wetter and could support aspen planting. Aspen is lacking in this area and is a key component in forest diversity. The Nature Conservancy and Summit County recently completed some very successful aspen planting.
 - Identify areas with live spruce-fir trees. Create a prescription that retains these areas in a condition that would lead to a mixed conifer or spruce-fir forest type. This could involve retaining dead and live lodgepole pine in and around those trees. We understand that there may be some blow down, but protecting spruce-fir and mixed conifer areas would create more forest type diversity compared to clear cutting these areas.

Regeneration and management

9. Large treatments by their nature disturb soils and can promote outbreaks of noxious weeds and invasive species. We request a project-specific plan with project funding to mitigate these outbreaks.
10. The standard for depth of wood chips in mastication units is <6 inches. We have seen areas with wood chips at that depth that took many years to revegetate. There is research that specifies that wood chip depth should be <2 inches to not retard revegetation. We request that change.
11. We request a long-term site-specific vegetation maintenance plan be created to keep vegetation densities at optimum levels for fuel loading, species and age diversity, ecological and esthetically values.

Respectfully,



Howard Hallman and Brad Piehl

(Summit County) Forest Health Task Force