

Forest Health Task Force

Comments on Environmental Assessment

USFS Swan Mountain Project



April 20, 2023

The Forest Health Task Force (FHTF) appreciates the work and analysis that the US Forest Service has completed to produce the Swan Mountain project draft Environmental Assessment (EA). The FHTF provided scoping comments on this project. Following are our comments on the draft EA, some of which relate to the comments that we provided during scoping.

1. **Fuels Reduction** – Although this area may be technically within the WUI, there are very few houses in the project area. It is a high recreational use area for hiking and mountain biking. Reducing fuels in this area will have less impact in reducing wildfire hazard 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.
2. **Landscape Diversity** - The EA Comment Period Notice states that one of the purposes of the project is to “*Create more diverse vegetation age classes*”. That purpose is presented as a need statement in the EA “*There is a need to create more diverse vegetation age classes to not only enhance available winter range forage for elk and mule deer, but also improve snowshoe hare habitat.*” The FHTF agrees that increasing age class diversity is one component of increasing diversity in this area, but we would suggest that increasing vegetation diversity would also benefit forest health and create more resilient forest conditions. Large clear cuts create large areas of single age trees and will only achieve age class diversity when viewed in a larger context. We recommend that clear cuts be broken up with patches of leave trees approximately 2-5 acres in size to minimize blowdown.
3. **Disclosure** - The National Environmental Policy Act (NEPA) is designed to provide disclosure of the effects of federal agencies’ actions. The direct, indirect and cumulative effects of actions should be disclosed. We did not find direct, indirect and cumulative effects descriptions for most of the actions discussed in the EA.
4. **Climate** - The climate change analysis uses the entire White River National Forest (WRNF) as the assessment area. It therefore concludes that the 2,427 acres of activity proposed is insignificant because it is such a small area compared to the 1.6 million acres of the WRNF. This analysis does not disclose the cumulative effects of all the other actions that potentially affect climate change on the WRNF. It also appears to dismiss climate change as an important factor to consider.

5. **Climate** - The climate change analysis uses some research on the effects of broadcast burning and applies it to the effects of pile burning. They are both prescribed fire but have different effects on carbon pathways. We believe the validity of using the broadcast burning research in this analysis is questionable. We are interested in the effects of pile burning on carbon sequestration. Carbon will be released into the air through pile burning. Some of that carbon could potentially become locked up in the soil through decomposition.
6. **Climate** - The climate change analysis does not provide any carbon accounting. We realize that this may be difficult but a disclosure of the direction of carbon fluxes compared to the existing conditions, and the future, would clarify the effects of the actions. Carbon accounting can help inform prescriptions, which could be refined to reduce release of carbon into the atmosphere, enhance subsurface carbon retention and stimulate quicker more diverse regeneration. As it stands, absent any carbon accounting, it is not possible to understand the full impact the proposed Swan Mountain Project has on Climate. As a matter of disclosure, there should at a minimum be a baseline calculation of biomass-contained-carbon removed and initially lost through proposed Project logging and burning operations. The baseline data should then be evaluated against long term project benefits such as probability of carbon loss through catastrophic wildfire, long term benefits of increased carbon sequestration through increased forest health and carbon capture through wood utilization.
7. **Hydrology** - The Hydrology analysis presents an effects analysis on water yield. The reference to Harr et al. 1975 is not appropriate because his research was primarily conducted in the Pacific Northwest that has a very different hydrologic response to vegetation treatments. There is more recent research that shows that water yield increases are very hard to measure in Colorado. MacDonald and Stednick (CWRRRI Completion Report No. 196) provide some specific Colorado analysis in Forests and Water: A State-of-the-Art Review for Colorado. Stednick also published - Effects Of Pine Beetle Infestations On Water Yield And Water Quality At The Watershed Scale In Northern Colorado, which basically concludes that beetle kill over millions of acres in Colorado did not increase water yield. The point is that water yield increases from forest management plans proposed in the Swan Mountain Project would be small and disappear in a couple of years. A better approach for Swan Mountain Project area water quantity and quality might be to modify prescriptions and cutting patterns based on local terrain, aspect, grades, soil, and vegetation types.
8. **Aspen** - Table 4 displays the timber types in the project area. The tabulation lists aspen with conifers as covering 1% of the area. Based on experience in the area, there is more aspen in the project area which may be present as a component in conifer stands. Expanding aspen in those areas could create more diversity and wildfire habitat, and also reduce wildfire behavior. We would suggest that actions that would expand aspen or, at a minimum, remove conifers from aspen, would fit into the purpose and need and increase forest diversity.

9. **Same comment from scoping** - Clear cutting is proposed as the majority treatment, with over 1,700 acres slated to be clear cut. 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.
10. **Same comment from scoping** - 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.
11. **Wood Chip Depth** - We appreciate the change in the standard for depth of wood chips in mastication units. Although we would prefer a <2-3 inch standard the revised language in the EA is improved.

Respectfully,

A handwritten signature in blue ink, appearing to read "H.S. Piehl", is written over the typed name.

Howard Hallman and Brad Piehl
(Summit County) Forest Health Task Force