

Brian Banks

South Platte Ranger District

Pike-San Isabel National Forest

via electronic portal: <https://www.fs.usda.gov/project/psicc/?project=65019>

March 20, 2024

Dear Mr. Banks:

The following comments are made on behalf of the residents at 1680 North Highway 67 regarding the Lower North South Vegetation Management Project as described in the second Purpose and Need and Proposed Action (“PNPA II”) found on the project website beginning in early March, 2024.

We are strongly opposed to all aspects of this project based on fire science, hydrology, concern for soil fertility and health, impacts on biodiversity, the threat this project incurs on endangered species of both plants and animals, the increase of poaching incidents this project brings to our property, the disruptive and damaging noise this project would bring to all inhabitants of this forest, and the increased risk of fire danger and structure loss that this project will create for our homes and for this forest.

In multiple studies, forests that were logged (what the forest service calls thinning) with chainsaws, heavy equipment and masticators did not slow fires. Wind and climate are the primary drivers of fire intensity, not fuel load. In large scale studies, it has been shown that in “thinned” or “treated” forests the fires burned more severely as a result of the dry conditions these treatments created, the mulched up trees and logging decks that were left behind, and the loss of wind breaks. These studies were not theoretical, but were based on actual fire studies in areas with high intensity burns. In one study which looked at 1500 fires across the West, the research found that protected forests burned at lower severities than treated forests. I have cited several other studies at the end of our comments supporting these same conclusions, many of them by the Forest Service itself.

On our own land, the detrimental effects of the USFS “thinning” projects are easy to observe. Our family entered into large contracts with the Forest Service; the land they treated (approximately 100 acres) in 2003 and again in 2010, have left behind piles of

mulch, damaged trees, and a large influx of flammable invasive weeds (cheatgrass which wasn't here prior to thinning, Canadian thistle, toadflax, mullein). The treated forests are at least 10 degrees hotter than the untreated forests since the shade was eliminated and the vegetation was altered causing the soil to lose its moisture content. The natural windbreaks that used to exist in these forests are gone since over 60% of the forest canopy was removed in these projects. It is clear from observation that these conditions have increased the danger to our homes. In addition, the Forest Service recently logged our neighbors land, the Rampart View Ranch, and left behind hundreds of large log decks that abut our property and will increase fire severity and duration if any wildfire sweeps through this area. The thinning projects that have already been conducted in this area have made the likelihood of our forest experiencing a severe burn greater as study after study continue to conclude.

In relation to the Lower North South Vegetation Management Project, our family is particularly concerned about the adjacent lands to our property. These lands run along the "no motorized vehicle" trail off Rampart Range Road. Many of these forests are on north facing slopes and have not been logged in the past and are old-growth forests for this area. These areas are moist, biodiverse, have healthy soils and are watersheds that produce our drinking water. Mechanically thinning these areas increases runoff and decreases soil and water quality as well as water availability over time as shown in the research paper "The High Costs and Low Benefits of Attempting to Increase Water Yield by Forest Removal in the Sierra Nevada" by Jonathan Rhodes and Christopher Frissel. Using heavy equipment compacts the soil and destroys the vegetation especially when mulch is left behind to suffocate the ground. Mulch in Colorado's climate does not biodegrade back into the soil as it would in moist climates. The mulch suffocates the native plants and makes the soil prime territory for invasive weeds which are highly flammable. Any thinning on adjacent lands would detrimentally affect our soil and water quality and we are asking the Forest Service to avoid any treatment in this area.

In addition, this trail is used by hunters, and since we thinned our land, poaching incidents have increased tenfold due to the visibility of our meadows and the elk who live here. Almost every year since the thinning occurred, we have reported incidents of poaching on these lands where thinning took place. Thinning more of these adjacent lands would increase these incidents as hunters are more tempted to come down to our private land where the local elk herd calve and raise their young. In addition, some of the land on this "no motorized vehicle" trail is owned by our family and we would not give

any permission for the Forest Service to access this private trail. There are no easements onto this land, and we will not allow any machinery coming in on this trail.

The Lower North South Vegetation Management Project would negatively impact all of the species who currently call this place home. A variety of owls, song birds, ravens, raptors, coyotes, foxes, elk, deer, squirrels and raptors live in these forests. The forests on our land and surrounding areas have pygmy nuthatches, Abert squirrels, goshawk, flammulated owl, and the pawnee montane skipper. All of these species have been sighted in this habitat during the past two years. This is prime habitat for the Mexican spotted owl, as well as the Preble's meadow jumping mouse. In addition, rare and endangered plants grow in this area. The fairy slipper has been seen in numerous areas of this forest. Any treatment of this area would put these species at risk. Because of the presence of sensitive species, it is essential to follow the NEPA and prepare an EIS for this project and on the surrounding forests of our land prior to any decisions being made for treatments.

The noise that heavy machinery brings into the forest is disruptive to our farm and our daily lives. The mulching sounds are similar to gunshots and when this work is occurring it feels like we are living in a war zone. Several of my neighbors have shared the same feelings with us during past thinning projects. Deanna has milk goats and sells milk shares for a living. Loud noises cause anxiety in farm animals and affect the production of milk and their ability to produce enough for their own kids and for milk share customers. These sounds also affect egg production in our chickens. The noises and their vibrations interfere with the mating of wild animals and birds and it scares them out of their own shrinking habitat. Wild animals who are highly attuned to the sounds in their environment are not able to hear and put out signals warning the forest community of danger with so much noise disruption. It affects their ability to raise their young and has detrimental impacts on their ability to survive. Our family works hard to ensure that species are conserved in this area, and we live here for the peace and serenity the sounds of nature bring to us. This project would degrade our quality of life.

Our family is specifically asking the Forest Service to leave the lands adjacent to our property untouched from this project. This would be the land on and surrounding the private "no motorized vehicle" trail that runs adjacent to our 480-acre parcel. We cherish this forest, have thoroughly researched the science on the effects of thinning, and have first-hand experience of the detrimental impacts of thinning on our forest ecosystem. The proposed mechanical thinning in the surrounding areas adjacent to our land could

increase fire severity putting us more at risk, will be detrimental for the wildlife and vegetation, will increase trespassing from hunters, will degrade our quality of life, and will diminish both soil and water quality for our family and the environment.

Thank you for your time and consideration,

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## REFERENCES

- Morris, W.G. (**U.S. Forest Service**). 1940. Fire weather on clearcut, partly cut, and virgin timber areas at Westfir, Oregon. *Timberman* 42: 20-28.
- Countryman, C.M. (**U.S. Forest Service**). 1956. Old-growth conversion also converts fire climate. *Fire Control Notes* 17: 15-19.
- SNEP (**co-authored by U.S. Forest Service**). 1996. Sierra Nevada Ecosystem Project, Final Report to Congress: Status of the Sierra Nevada. Vol. I: Assessment summaries and management strategies. Davis, CA: University of California, Davis, Center for Water and Wildland Resources.
- Beschta, R.L.; Frissell, C.A.; Gresswell, R.; Hauer, R.; Karr, J.R.; Minshall, G.W.; Perry, D.A.; Rhodes, J.J. 1995. *Wildfire and salvage logging*. Eugene, OR: Pacific Rivers Council.
- Chen, J., et al. (**co-authored by U.S. Forest Service**). 1999. Microclimate in forest ecosystem and landscape ecology: Variations in local climate can be used to monitor and compare the effects of different management regimes. *BioScience* 49: 288–297.
- Dombeck, M. (**U.S. Forest Service Chief**). 2001. How Can We Reduce the Fire Danger in the Interior West. *Fire Management Today* 61: 5-13.
- Morrison, P.H. and K.J. Harma. 2002. *Analysis of Land Ownership and Prior Land Management Activities Within the Rodeo & Chediski Fires, Arizona*. Pacific Biodiversity Institute, Winthrop, WA. 13 pp.
- Donato DC, Fontaine JB, Campbell JL, Robinson WD, Kauffman JB, Law BE. 2006. *Science* 311: 352.
- Hanson, C.T., Odion, D.C. 2006. Fire Severity in mechanically thinned versus unthinned forests of the Sierra Nevada, California. In: *Proceedings of the 3rd International Fire Ecology and Management Congress, November 13-17, 2006, San Diego, CA*.
- Platt, R.V., et al. 2006. Are wildfire mitigation and restoration of historic forest structure compatible? A spatial modeling assessment. *Annals of the Assoc. Amer. Geographers* 96: 455-470.
- Thompson, J.R., Spies, T.A., Ganio, L.M. (**co-authored by U.S. Forest Service**). 2007. Reburn severity in managed and unmanaged vegetation in a large wildfire. *Proceedings of the National Academy of Sciences of the United States of America* 104: 10743–10748.
- Cruz, M.G, and M.E. Alexander. 2010. Assessing crown fire potential in coniferous forests of

western North America: A critique of current approaches and recent simulation studies. *Int. J. Wildl. Fire*. 19: 377–398.

Thompson, J., and T.A. Spies (**co-authored by U.S. Forest Service**). 2010. Exploring Patterns of Burn Severity in the Biscuit Fire in Southwestern Oregon. *Fire Science Brief* 88: 1-6.

Graham, R., et al. (**U.S. Forest Service**). 2012. Fourmile Canyon Fire Findings. Gen. Tech. Rep. RMRS-GTR-289. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 110 p.

DellaSala et al. (2013) (letter from over 200 scientists):

North, M.P., S.L. Stephens, B.M. Collins, J.K. Agee, G. Aplet, J.F. Franklin, and P.Z. Fule (**co-authored by U.S. Forest Service**). 2015. Reform forest fire management. *Science* 349: 1280-1281.

Bradley, C.M. C.T. Hanson, and D.A. DellaSala. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western USA? *Ecosphere* 7: article e01492.

Lesmeister, D.B., et al. (**co-authored by U.S. Forest Service**). 2019. Mixed-severity wildfire and habitat of an old-forest obligate. *Ecosphere* 10: Article e02696.

Dunn, C.J., et al. 2020. How does tree regeneration respond to mixed-severity fire in the western Oregon Cascades, USA? *Ecosphere* 11: Article e03003.

Meigs, G.W., et al. (**co-authored by U.S. Forest Service**). 2020. Influence of topography and fuels on fire refugia probability under varying fire weather in forests of the US Pacific Northwest. *Canadian Journal of Forest Research* 50: 636-647.

Lesmeister, D.B., et al. (**co-authored by U.S. Forest Service**). 2021. Northern spotted owl nesting forests as fire refugia: a 30-year synthesis of large wildfires. *Fire Ecology* 17: Article 32.

Stephens, S.L., et al. (**co-authored by U.S. Forest Service**). 2021. Forest Restoration and Fuels Reduction: Convergent or Divergent? *BioScience* 71: 85-101.

Hanson, C.T. 2021. Is “Fuel Reduction” Justified as Fire Management in Spotted Owl Habitat? *Birds* 2: 395-403.

Hanson, C.T. 2022. Cumulative severity of thinned and unthinned forests in a large California wildfire. *Land* 11: Article 373.

Baker, B.C., and C.T. Hanson. 2022. Cumulative tree mortality from commercial thinning and a

large wildfire in the Sierra Nevada, California. *Land* 11: Article 995.

Prichard, S.J., et al. (**co-authored by U.S. Forest Service**). 2021. Adapting western US forests to wild-fires and climate change: 10 key questions. *Ecological Applications* 31: Article e02433.

DellaSala, D.A., B.C. Baker, C.T. Hanson, L. Ruediger, and W.L. Baker. 2022. Have western USA fire suppression and megafire active management approaches become a contemporary Sisyphus? *Biological Conservation* 268: Article 109499.

Bartowitz, K.J., et al. 2022. Forest Carbon Emission Sources Are Not Equal: Putting Fire, Harvest, and Fossil Fuel Emissions in Context. *Front. For. Glob. Change* 5: Article 867112

Evers, C., et al. 2022. Extreme Winds Alter Influence of Fuels and Topography on Megafire Burn Severity in Seasonal Temperate Rainforests under Record Fuel Aridity. *Fire* 5: Article 41.

USFS (U.S. Forest Service) (2022). Gallinas-Las Dispensas Prescribed Fire Declared Wildfire Review. U.S. Forest Service, Office of the Chief, Washington, D.C.