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Organization:

Title:

Comments: Forsythe II

Attached are comments regarding Forsythe II.

I would appreciate a response confirming you received my comments and they are part of the public record.

Thank you,

Dave

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RE: Forsythe II

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Following are some comments pertaining to Forsythe II. Need for a Landscape Assessment

Has there been any assessment of the matrix of patch types, size, structure, and their spatial arrangement within the entire project boundary, including USFS, County Open Space, and private lands? Are there goals for what we are trying to achieve from a matrix perspective within this specific landscape?

It is interesting to look at recent aerial photographs of the landscape. Two ecological site types stand out, meadows and north-facing slopes. The largest grasslands in this landscape are the result of soil type, not fire frequency. These sites were homesteaded due to the relatively abundant grass and were removed from the public domain - Reynolds Ranch (now BOCO Open Space), Scates Ranch, Stilson Ranch, and the meadows between Twin Sisters and Forsythe Rock. These meadows are all concentration areas for wintering elk, certain species of small mammal, and meso-predators. The north-facing slopes appear as ribbons of dense forest that trend west to east - Boulder Canyon, Winiger Ridge, and Tungsten Mountain and its east flank. These linear slopes provide important movement corridors and hiding cover for large and mid-sized mammals; they are becoming increasingly important due to a growing human presence in the form of homes, roads, trails, and forest management.

I know there is a feeling that much of the rest of the landscape, particularly stands of mixed-conifer, "have departed from historic fire regimes" (Proposed Action Description Page 2). Though it is interesting that stands of lodgepole pine, which are intermixed and adjacent to mixed-conifer, "have not departed from the historical fire regime" (Proposed Action Description Page 4). We are getting caught up in trying to fit each stand into a certain vegetation type and management prescription, while losing sight of the larger landscape. Most of the literature says that the upper montane is not out of the range of natural variability. Some recent studies and guidelines for mixed-conifer focus on the loss of small patches and that sites are more likely to be forested than during the earlier time period selected for comparison. But does this have to apply to every stand of mixed-conifer?

How much vertical and horizontal structural diversity is needed at the landscape level? A good portion of the landscape has been managed over the past 50 years. This includes USFS lands, BOCO Open Space, and private lands. For some sites on USFS land, this is the third entry for management since I have been here. From looking at aerial photographs (Google Earth photo dated October 9, 2015) and being on the ground, horizontal and vertical structural diversity are present. What are we trying to achieve?

"Improving Wildlife Habitat to Benefit Species within the Project Area"

The above statement is one of the purposes of the Forsythe II project (Proposed Action Description Page 1). I don't find it to be true. We are simply shifting the vegetative structure of the landscape in favor of one set of species over another. There will be no increase in biodiversity at the landscape level. There might be at the stand level, but these will largely be habitat generalists - the little brown myotis/dark-eyed junco/large marble complex. There is some feeling in the proposal that further increasing horizontal and vertical structural diversity will improve habitat. But vegetative structural diversity is present throughout the landscape. The focus on increasing structural diversity is akin to the push for increased edge in the landscape 35 years ago - yes there were more animals found at forest edges, but most were small-territory generalist species. Some of the more sensitive animal species likely to be present in this landscape, including American three-toed woodpecker, American marten, fringed myotis, and Townsend's big-eared bat, require forest interior habitat for part or all of their lifecycle, and many need hiding cover and effective habitat.

Also, good structural diversity is not a dominant feature of the plant communities present within the project boundary, except for the limited amount of riparian found in gulches. Shrubs are not a strong component of these communities. It is good to try and protect some of the more unique habitat components found in this landscape, such as old-growth, large diameter trees, and junipers.

Aspen is not a major component of landscapes east of the Peak-to-Peak highway, though important nonetheless. A relative lack of moisture along with soil types that favor conifers disfavor the prolonged persistence and development of large-diameter aspen. Many of the patch cuts created in the 1970s and 80s in the project boundary were dominated by aspen in the sapling stage, but eventually turned to a conifer dominated stand. Cavity-nesting avian communities are not as robust in stands of aspen east of the Peak-to-Peak as they are to the west.

It is possible that a larger issue for wildlife, particularly wide-ranging animals, is maintaining effective habitat and hiding cover. There is a lot going on in this landscape

- homes, roads, trails, and forest management. Effective habitat and hiding cover are on the decline.

Weeds

Be ready to manage Canada thistle and other noxious weeds. It appears that the seed source is fairly rampant throughout the landscape, even in sites that are currently lodgepole pine forests. Having watched your recent management activities as well as those of Boulder County, it is evident that this noxious weed is abundant and widespread.

In the 1990s there was a lightning strike that started a small (less than 1 acre) fire in a stand of lodgepole pine on USFS land just north of Reynolds Ranch. My wife and I went back to the site the following summer and were amazed at the amount of Canada and musk thistle. Trucks had been driven to the site, but not within, though that could have been a source. We spent several years managing the noxious weeds at this site. The weeds disappeared as conifers started to regenerate.

Twin Sisters

The Twin Sisters area (stand #77 on the Proposed Action Map) is an important habitat connector linking the Winiger Ridge/Magnolia Road area with Walker Ranch Open Space. This is the primary animal movement corridor as they have to circumvent Gross Reservoir and Lake Shore Estates. It is used by elk throughout the winter, as there is back-and-forth movement dependent on snow depth and weather. It is also used by mule deer, black bear, mountain lion, bobcat, and other mid-sized mammals at other times of the year. Hiding cover is particularly important along a habitat connector. I wonder if this management is in the best interest of the movement corridor. Much of this area received forest management in the recent past.

Roads

There should be no new roads as part of any forest management action in the project boundary. Some roads used for recent management activities that were decommissioned were eventually turned into social trails for mountain bikes. Also, a number of the roads shown on the Proposed Road Recommendations map that are slated for closure and/or decommission have seen past attempts at closure but were unsuccessful; motorized use, primarily dirt bike, persists. This is particularly true in the Winiger Ridge/Winiger Gulch area.

Conclusion

Overall, I am not convinced that much of the forest management occurring in western Boulder County in the name of forest restoration and wildfire mitigation is ecologically correct nor sustainable when comparing long-term costs vs. benefits. My reasoning is partially based on the fact that the vast majority of acres that burn every year do so under extreme weather conditions (low humidity, high wind). For the Fourmile Canyon fire, 93% of the land that burned occurred during extreme weather; for the Hayman fire it was 80%. During these events, lands managed for wildfire mitigation have a lower probability of success. Recent reports indicate that fuel treatments may not reduce fire suppression expenditures or the area burned by wildfires. But the train has left the station on this issue, fueled by fear, money, and an associated industry, so we are in the next experiment in land management. We will have to wait several decades to evaluate the success of these programs.

Thank you for consideration of these comments.