Data Submitted (UTC 11): 5/5/2021 11:00:00 AM
First name: Owen
Last name: Severance
Organization:
Title:
Comments: This is my third set of comments on the Draft Revised Forest Plan dated October 2020. They concern the effects climate change will have on the Monticello Ranger District along with associated concerns. Climate change and its possible effects have been known for decades, yet the Forest Service has done little to address the problem in southeastern Utah.

The Monticello Ranger District[rsquo]s history is different than that of the other Ranger Districts. In the mid-1880s, an old growth Ponderosa Pine forest existed on Elk Ridge and on the surrounding areas. In the 1880s, large herds of Texas cattle - as many as 10,000 head at a time - were turned loose on the forest. The cattle ate the abundant grasses that had fueled periodic fires that kept the regeneration in check. (And cattle have grazed the area ever since.) As a result, a dense second growth forest was allowed to start. The response by the Forest Service was tree mining. In the 1960s and 70s, at least 95% of the old growth forest was exterminated. That logging didn[rsquo]t address the issue that the forest was still too dense because of the second growth. The Forest Service has never adequately thinned that second growth forest to reduce the threat of bark beetles. In the late 1980s and early 90s, a large area of Ponderosa Pine was clear cut by bark beetles along Forest Road 88. Afterward, the Forest Service had a salvage sale and tried to replant trees. While that may have been the first major beetle outbreak in recent history, it won[rsquo]t be the last. We are in the 25th year of a long-term drought. Beetles have been active again in the Pinyon Pine forest around 7,000' and lower, so it won[rsquo]t be long before a large bark beetle outbreak takes place in the Ponderosa Pine forest. This year has been one of the driest of the last 25, so I expect that outbreak to happen sooner rather than later.

The forest on the Monticello Ranger District will never return to its 1850 [ldquo]natural[rdquo] state again. It suffered too much abuse at the hands of cattlemen in the late 19th century and then the Forest Service in the 20th. The best that the Forest Service can do now is to take actions that will drastically thin out the second growth forest to try to stay ahead of bark beetles and wildfires; and then sometime in the distant future an old growth component may return.

2.5 Climate Adaptation

Description and Values

Changes in precipitation and temperature regimes and their inherent variability in the Intermountain Region are a source of dramatic changes on the landscape. In the region, greenhouse gases, temperatures, and community water needs are projected to continue an upward trajectory (USDA 2016f). Climate projections indicate warming temperatures, throughout vast areas of the Intermountain Region (R4 IAP 2018).

This is not news. It has been known for decades that the climate in the southwest is becoming warmer and dryer. But there is an expectation that adjustments to prioritize management actions may be necessary to respond to these changes.

You apparently haven[rsquo]t received the message that action was needed years ago.

Management Approaches

Management approaches are not required by the 2012 Planning Rule. They are articulated here to describe principal strategies, program priorities, focus for projects and objectives, as well as likely management emphasis that the responsible official intends to carry out through projects and activities developed under the plan.

[bull] Consider the potential impact that a changing climate may have on ecosystems during project analysis.

[bull] Prioritize increasing resilience and resistance in ecosystems that have been identified as having the highest sensitivity and the least adaptive capacity to climate change. These ecosystems are dry sagebrush types, tall and short forb communities, alpine, fen and lowelevation riparian areas and wetlands, and dwarf sagebrush.

What about Ponderosa Pine? All of the Ponderosa Pine forest on the Monticello Ranger District is at risk from bark beetles and wildfire. The thinning of that forest should be a priority.

2.6.1 Coniferous Forest

Objectives (FW-CONIFER-OB)

(03) Treat a minimum of 5,000 acres of ponderosa pine every 5 years over the life of the plan to maintain stand health and restore fire disturbance regime.

Why doesn[rsquo]t this section give goals for each Ranger District? Five thousand acres is just under 8 sections. An area that size should be thinned just on the Monticello Ranger District every five years for the next several decades. My comments on previous timber sales on the District requested 50 year entries instead of the 20 year entries that were used. I was ignored. Now the Ponderosa Pine forest is even more at risk. I don[rsquo]t expect the Forest Service to wake up to the threat until after catastrophic events occur. On the Moab Ranger District, in order to protect the larger trees and to have an old growth component on that forest, all trees within 50' of the older trees were cut down. That is what should be done on the Monticello Ranger District: thin the Ponderosa Pine forest so that there will be 50' spacing between trees. Then there would be the possibility of old growth trees sometime in the future.

Management Approaches

[bull] Focus silvicultural treatments, vegetation manipulation, and wildfire on maintaining and restoring the appropriate fire regime group and enhancing all vegetation-dependent resources, including wildlife habitat for species associated with fire-adapted systems.

The [ldquo]appropriate fire regime[rdquo] cannot not return because the grasses necessary to carry the fire are being eaten by cattle.

[bull] Capitalize on both naturally occurring and management driven disturbance events, including fire, insects and disease, and mechanical treatments, to restore and maintain mosaic habitat structure, vegetation composition, and natural processes.

It[rsquo]s too late to [ldquo]restore and maintain mosaic habitat structure, vegetation composition, and natural processes.[rdquo] It[rsquo]s time for the Forest Service to wake up and accept the fact that climate change is here to stay. You should be trying to establish a stable Ponderosa Pine forest on the Monticello Ranger District that is less susceptible to the climate changes that will cause bark beetle outbreaks and wildfires before it is too late.

[bull] Prioritize vegetation management projects that maintain or improve Ponderosa Pine old growth characteristics.

The old growth component was removed from the Monticello Ranger District in the 1960s and 70s. Restoring an old growth component will take at least another 100 years. When is the Forest Service going to start managing

the Monticello Ranger District to eventually have an old growth component in the Ponderosa Pine forest? What was the old-growth tree density on the Monticello Ranger District in the early 1800s? A survey of large tree stumps could provide this answer. It could be used as a starting point for determining how drastically to thin the second growth forest.

2.6.3 Woodlands

Description and Values

Expansion of pinyon and juniper stands and expansion of pinyon and juniper into former grasslands and shrublands during the past 150 years have been well documented in many parts of the western United States.

While this statement may be true in some surrounding areas, it is not true for southeastern Utah. Tens of thousands of acres of the Pinyon/Juniper forest have been destroyed by chaining projects carried out by the BLM, Forest Service, State Lands and private land owners. The Pinyon/Juniper woodland covers less area in southeastern Utah than it did in the 1950s. Find out what the P/J forest looked like before the area was settled. Many of the trees that were alive then are still alive today if they haven[rsquo]t been destroyed by [ldquo]progress.[rdquo] I[rsquo]m sure that the Forest Service doesn[rsquo]t have a clue as to the ages of the trees in a typical old growth P/J forest in southeastern Utah. Do the research.

[bull] Actively manage and prioritize funding for degraded pinyon and juniper stands. These degraded characteristics include relatively low productivity compared to their historic state, depleted perennial herbaceous layer, increased bare ground, and invasive species vegetation codominance or dominance.

There is that term [ldquo]bare ground[rdquo] again. That is not bare ground. It is covered by a very important biotic soil crust. I[rsquo]ve previously complained about the Forest Service[rsquo]s use of this incorrect term. Do your homework! It is easily damaged by cattle and other impacts such as chaining. A lot of scientific investigation has been done on the importance of this living crust. Benefit from it. And how do you know what their [ldquo]historic state[rdquo] was?

Objectives (FW-WOODLAND-OB)

(01) Treat a minimum of 50 acres of pinyon-juniper woodlands every 10 years to maintain herbaceous and shrub plant communities.

Why do I distrust the figure of 50 acres? With all of the verbiage in this part of the draft, it appears that an all-out war will be declared on the P/J forest.

2.10 Recreation and Access

Why doesn[rsquo]t this section refer to a map that shows all of the roads, trails, lakes, viewpoints, campgrounds and use areas on the Monticello Ranger District? That map should be the starting point for a discussion of recreation and access.

2.14 Minerals and Energy Resources

Why isn[rsquo]t there a list of mines on the Monticello Ranger District that need to be reclaimed and a schedule for doing the cleanup? Is the Forest Service going to pretend it doesn[rsquo]t know where they are?

This draft is lacking in the basic information (data) that should be used to create a Forest Plan. Please start over and include data that justifies the decisions being made in the revised Forest Plan.