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Comments: Please see attached letter.

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Via web portal: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=61372>

Comments on Saint Vrain Forest Health Project #61372 Preliminary Environmental Assessment (PEA)

April 18, 2023

Dear Ranger McLaughlin and staff:

I support and sign on to the comments to be submitted by Rocky Smith et. al. on the proposed St. Vrain Forest Health Project Preliminary Environmental Assessment.

While I appreciate the effort that went into preparing the detailed Consideration of Comments document published with the Preliminary Environmental Assessment, I am disappointed that neither that document nor other documents published as part of the Preliminary Environmental Assessment address the fundamental point of my initial comments for the Project dated July 8, 2022, which I submitted as part of the initial public comment period for the Project.

My comments of July 8, 2022 (which I incorporate here by reference) question the real-world effectiveness of proposed treatments outside of two specific situations:

1. Lower-elevation (lower montane) ponderosa pine ecosystems where site-specific analysis shows that stands have significantly departed from historical conditions
2. Ignition zones within 30 meters of buildings or other infrastructure

The Project Preliminary Environmental Assessment and the Consideration of Comments responses assume that the proposed treatments outside of the above listed two specific situations can promote overall ecosystem health, improve forest resilience, and reduce fire behavior and fire severity. But it is precisely these assumptions that I am challenging with my comments of July 8, 2022, and again now.

All treatment approaches proposed for the Project have negative impacts on ecosystem and forest health. Some of these negative impacts are acknowledged in Project documents and additional
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negative impacts are detailed in the July 6, 2022, comments submitted by Rocky Smith et al. Executing a treatment only makes sense if the overall benefits to be achieved by that treatment exceeds the ecological costs in the form of these negative impacts. While the St. Vrain Project Preliminary Environmental Assessment documents makes seemingly plausible arguments for the fire mitigation and other ecological benefits of treatments proposed for areas other than lower-elevation (lower montane) ponderosa pine dominated landscapes, the observed reality is that forest treatments such as the ones proposed for the Saint Vrain Project for elevation above lower montane are ineffective or even counter-productive with regarding to reduction of fire severity and ecosystem health improvement. This observed reality should not be surprising as the proposed treatments are intended to deviate landscapes naturally adopted to mixed and high severity fire regimes into more moderate fire regimes. How could such unnatural deviation be good for the ecological health of these landscapes?

On page 34 of the Consideration of Comments document there is a remark stating:

"An extensive body of research has documented the effectiveness of combined surface, ladder, and crown treatments on reducing fire behavior and fire severity. Combining surface treatments with ladder and canopy fuel treatments is the most effective way to reduce impact to communities, improve suppression effectiveness and increase resilience of forests."

This statement notably does not distinguish between research that documents the purported claim within lower montane ponderosa ecosystems vs. higher elevation ecosystems that are naturally adopted to mixed and high severity fire regimes, which is precisely the distinction that needs to be addressed if the Project is to be designed to actually improve ecosystem health in the real world.

I again propose that the Project be redesigned to focus only on treatments that have actually proven to be effective in the real world, which points back to the proposals made by both Rocky Smith et al. and by me in our original comments on the Project: restrict treatments to lower-elevation (lower montane) ponderosa pine, where site-specific analysis shows that stands have significantly departed from historical conditions. In addition, focus attention on the proven benefits of concentration on home ignition zones and the equivalent for other infrastructure.

This proposed redesign of the project should also eliminate the most destructive forms of treatment currently proposed, mechanical treatments, which introduce completely unnatural soil compactification that creates opportunities for further establishment of invasive weeds.

Sincerely,

Alex Markevich, Ph.D.

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