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First name: Alex

Last name: Markevich

Organization:

Title:

Comments: Please see Comment letter in attachment.

Kevin McLaughlin

Boulder Ranger District

2140 Yarmouth Ave.

Boulder, CO 80301

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

Comments on Saint Vrain Forest Health Project #61372 Draft Decision

September 5, 2023

Dear Ranger McLaughlin and staff:

I support and sign on to the comments on the Draft Decision being submitted by Teagen Blakey on behalf of the Magnolia Forest Group. I also support and sign on to comments on the Draft Decision submitted by Josh Schollossberg on behalf of the Eco-Integrity Alliance.

The response to my previous comments (see Alex Markevich et. al. comments submitted on 4/16/2023 and earlier comments submitted on 7/9/2022) does not address the substance of my objection. Instead, the response simply points to sub-project management plans that "could" at some future time potentially consider inputs that most pointedly do NOT include the considerations I raised in my comments. I therefore maintain my objection until I will have the opportunity to review and input on these sub-project management plans in order to ensure that they in fact do incorporate the substance of my comments.

In response to comments by others (see page 17 of the Consideration of Comments document) the statement is made that "In the montane zones (90% of the proposed treatment area), there is substantial overlap of forest health and fuels reduction objectives." This is precisely the kind of incorrect conflation of ecological zone to which I object. While it is possible that "there is substantial overlap of forest health and fuels reduction objectives" in the lower montane, my previous comments specifically question the existence of such an overlap in the upper montane.

Proposed treatments in upper montane and higher elevation ecological zones are not aligned to the natural ecological processes and health of these ecosystems. Therefore, any treatments in these ecosystems should be applied sparingly, if at all. As per my objections, I prefer that treatments not be applied in these ecosystems. Design of any treatments in these ecosystems needs to include a strong aesthetic consideration, particularly along POD boundaries that run along roads, as the treatments will significantly deviate the visual qualities of the surrounding landscape from what is natural for that landscape.

In the end, if any treatments are undertaken within the upper montane and higher elevation ecological zones, such treatment should only be done manually in order to avoid the devastating negative ecological impacts of mechanical treatments within these ecological zones.

The Specialist Report on Fire, Fuels, and Air Quality correctly states on page 3 that "Those vegetation treatments that target the removal of live mature overstory vegetation, i.e., patch cutting, clear cutting, and overstory removal, are the least capable of reducing fire behavior and fire severity over the medium to long-term and may in fact increase future fire severity." Such treatments also potentially increase the speed of wildfire spread in the short term both by reducing moisture retention in the ground and by providing enhanced opportunities for wind to drive fire quickly across the landscape, particular during severe weather events that are associated with severe wildfires. As patch cutting, clear cutting, and overstory removal increase wildfire danger particularly during the most severe weather and wildfire events, such treatment prescriptions should not be used.

Without visibility into not yet created sub-project management actions plans for specific management action, it is impossible for interested members of the public to judge whether the actual application of the treatment prescriptions will or will not correctly balance the multiple factors that need to go into the design of actual treatment prescriptions in order to improve ecosystem health and meet the multiple objectives of the overall project. Therefore, the Project needs a robust mechanism for ongoing public review and input into actual sub-project treatment prescription design such as the Multiparty Monitoring Group that provided such input to the Forsythe II Project.

Sincerely,

Alex Markevich, Ph.D.  
5570 Magnolia Drive  
Nederland, CO 80466  
(303) 442-4475  
ajmarkevich@gmail.com

Christel Markevich  
5570 Magnolia Drive  
Nederland, CO 80466  
(303) 442-4475  
christelmarkevich@gmail.com

Anyll Markevich  
5570 Magnolia Drive  
Nederland, CO 80466  
(303) 442-4475  
anyllmarkevich@gmail.com