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Comments: Comments of Howard Brown, Silverthorne, CO

on "White River Forest Health and Fuels Management Project"

(project should be given a more specific name to distinguish it from previous and future "health and management" plans and projects)

"Thinning" - This proposed project seems to be primarily about thinning dense stands of lodgepole pine that have grown from past clear-cutting projects. When I first started looking at older (80-100 years+? since clear-cutting), beetle-impacted stands of lodgepole pine slated for clear-cutting, I found that I much preferred them to the dense, tall, scrawny "middle-aged" (50+? year-old) stands and certainly to the young (<30? year-old) super-dense overgrown-X-mas-tree lot or dog-hair stands. Feeling that part of the preference was because of the wider spacing of the trees, I asked Forest Service personnel about the possibility of thinning the younger stands. I was told that any sort of hand work was economically prohibitive (in these tight-budget times have hand-cutting economics somehow dramatically changed?) and that the only economically feasible thinning was pulling seedlings, but that that couldn't be done because of an agreement about promoting lynx (because of snowshoe hares liking the dog-hair thickets and lynx liking snowshoe hares - is that agreement no longer in force?).

I have since come to realize that it is the nature of lodgepole pine to grow densely and that that is the only way they can grow successfully. Because of their minimal root structure and top-heavy foliage, they blow over without the protection of being densely surrounded by other trees (dead or alive). The most dramatic and disastrous evidence of this comes from the ill-advised Dillon-Ranger-District policy of cutting dead trees within falling distance of recreational trails. Huge numbers of other (primarily live, but now also dead) trees along the trails subsequently blew down, leaving an unsightly mess, leaving trails exposed and requiring constant trail maintenance. You can also see this unprotected blowdown on private land adjacent to buffer-zone clear-cuts and whenever individual or small stands of trees are left standing in clear-cuts. It is counterproductive to thin lodgepole pine. To the extent that that is the primary plan of this project, the project should be dropped. With the aid of beetles and other natural forces, lodgepoles will gradually thin themselves, eventually becoming wider spaced as they age.

Succession - This project proposal makes no mention of the primary process of forest ecology, namely succession. Approaching the culmination of this process of nature, in high-altitude areas of Summit County and other parts of the White River Forest, lodgepole pine forests gradually morph into more stable, resilient, biologically rich (and desirable) Englemann spruce/subalpine fir forest. Older, beetle-impacted lodgepole forests are at the critical stage of this process and should never be clear-cut or thinned. All previously planned but uncompleted cutting projects in these areas should be abandoned.

As you travel through these forest stands, you can see young spruce and fir growing up under the thinning lodgepole. Along wide roads, trails along which dead trees have been cut, and micro-burst or other disturbances that have created larger openings, however, you are more likely to see lodgepole seedlings. Younger lodgepole stands such as those subject of this project are predominantly sterile underneath. To whatever extent they are thinned, however, they will likely develop a higher percentage of new lodgepole vis-a-vis spruce/fir as the original lodgepole age, naturally thin, and allow new growth underneath the canopy. Thus the natural succession process to climax forest could be dramatically set back.

Burned Areas - To whatever extent this project might apply to burned areas, the same reasons for not clear-cutting or thinning apply. The burned-but-standing trunks still provide wind protection for their neighbors and partial shade that fosters spruce/fir development. It is especially important that burned areas not be thinned.

Changing Climate - This project proposal also makes no mention of the crucial fact that Colorado is experiencing dramatically warmer and drier weather, with associated chance of serious fires. Existing forest, especially climax spruce-fir stands and older lodgepole stands in the process of morphing to spruce-fir, should be treated as increasingly valuable resources. Forest thinning or clear-cutting may result in dry, low-elevation areas turning to sage brush instead of reforesting or the forest succession process being substantially slowed or disrupted in other areas. Cutting and thinning should therefore be kept as minimal as possible.

Planting - (Other than some previously planted spruce stands), this project proposal also makes no mention of planting-required by law when cut areas do not quickly reforest. Whether because of changing climate or winter-time cutting, recently clear-cut areas in Summit County are not repopulating with lodgepole anywhere near as rapidly as would previously have been expected. Planting would be a far better use of scarce financial resources than cutting or thinning. Near development, aspen would seem to be a wise choice because of their beauty, rapid growth and relative fire-resistance. In light of changing climate, it might also be valuable to experiment with Douglas fir, blue spruce or other species that traditionally only grew at lower elevations.

(With regard to the previously planted Englemann spruce, I would think that the natural joint growth of subalpine fire would be valuable, reducing homogeneity and more closely resembling a natural climax vegetation instead of monoculture more susceptible to insects and disease.)

"Pre-Commercial" - The use of the term pre-commercial thinning for the two main prescriptions of the project proposal indicates an outdated and inappropriate agency mindset. In Colorado and other arid West or high-altitude areas, forest stands have far greater economic and other value for recreation and natural beauty than for commercial timber harvest. Lodgepole pine in particular have little timber value. All recent cuts in Summit County have been service contracts that cost taxpayer dollars rather than generating public revenue.

Varied Ecology - This project proposal also makes no mention of varied climate and ecology within the White River Forest. My comments are based on experience with spruce-fir forest of subalpine Summit County. They likely apply to much of the forest, but possibly not all.

Specifics -

Page 1, paragraph 1 - "The proposal aims at .... perpetuating past management actions." - these past actions should be evaluated before being assumed to have been good choices; I would assert that many, particularly clear-cutting, were not.

Page 1 and 2 bullets

management/managing need definition

reducing density will likely decrease resiliency by subjecting trees to windblow and disrupting the natural succession process

promoting a spruce monoculture reduces rather than enhances diversity

Page 1, paragraph 2 - Bureauspeak

Page 3, bullet 2 - absolutely false; spruce-fir rather than lodgepole regenerate underneath partially dead canopies from beetle kill

Page 3, paragraph 3, page 4, paragraph 1 and page 6, paragraphs 2 and 3, page 8 - vicinity of recreational trails and roadless areas should be added to list of areas in which no thinning would occur

Pages 4 and 5, Treatment Methods - mechanical equipment seems totally incompatible with "thinning," suitable only for clear-cutting

Page 6, bullets 2 and 3 - rather than or in addition to review by "resource specialists," prescriptions should be reviewed by a panel including environmental, recreational, neighborhood and other public representatives

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