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Comments: To Whom This May Concern:

I would offer the following comments on the Spruce Project. I was disappointed that my 4 requests for information was not answered. (3 phone calls and one email to Jeff Underhill). It is also hard to offer specific comments when a person does not know where the treatments are going to take place.

The BHNH states that the reasons for implementing the Spruce Project are as follows:

"It is well documented that dense, over-stocked, even-age, closed canopy stands are more susceptible to insect outbreaks and stand replacing fire events. It is also well documented that a lack of structural diversity corresponds directly to a reduction in forest resiliency and consequently long-term resistance to detrimental natural and human-caused disturbance events. Based on management direction within the spruce and aspen forest types as well as direction for fire behavior, the following needs have been identified: "

* The need to increase the occurrence of ponderosa pine and aspen in mixed conifer stands that are now dominated by spruce;

Comment: There are many areas where pine was once the dominant overstory tree and spruce over time has become the dominant understory species due to the lack of fire. You could describe this condition as pine being the seral species. In many of these stands the USFS has commercially harvested most of the ponderosa pine and has left the noncommercial spruce to take over these sites. Additionally, mountain pine beetle has also speeded up this transition to spruce climax by killing most of the overstory pine during the last epidemic period 2000-2016. These sites still have some residual pine left on them but spruce will continue to increase its presence unless commercially or noncommercially removed.

This same scenario has and is occurring in the aspen stands. Aspen is the seral species and spruce is encroaching into the stands and now dominates the understory.

In both cases timber harvesting should be used to remove the commercial spruce trees followed by noncommercial treatments that remove the spruce regeneration. Allowing spruce to continue to encroach into these areas significantly increases the risk of severe wildfire damage to the landscape due to high fire intensity.

I believe this should be the primary goal for this project.

* The need to increase the structural heterogeneity in those stands that were always spruce dominated;

Comment: Spruce is the climax species on these sites and usually occurs in many age classes and in uneven structure. These older spruce stands do not need to be managed and for the most part are doing well and are able to regenerate successfully. These spruce stands also provide excellent wildlife habitat for many interior mammal and bird species. They are also important elk hiding and thermal areas. In many cases the pine stands around these spruce stands have been either harvested and/or decimated by mountain pine beetle. The elk uses these areas in the summer for thermal reasons and in the fall as hiding and resting cover. This heavy cover is extremely important for elk and I recommend that these spruce stands be left alone

* The need to create openings in over-mature spruce dominated stands that Spruce Vegetation Management Project Scoping Package 6 have increasing fuel loads and ladder fuels, and;

Comment: I do not believe this is a serious problem. It is important to keep many of these overmature, old growth spruce areas intact. They normally occur on steep north slopes and are not prone to burn. In many cases, the fire interval maybe a 100 years. Their locations are usually not contiguous and are not located in WUI areas and I do not believe that they are a significant factor in wildland fuels management.

* The need to provide economic support to local communities by providing wood fiber and creating jobs in a sustainable manner

Comment: While I support trying to maintain the current forest products infrastructure, I would not be in favor of cutting much of the old growth spruce stands. They are too valuable as wildlife habitat. Additionally, these stands do not represent a significant amount of volume, are often very hard to harvest due to the proximity of a live

stream or riparian area and are located on steep slopes. When these conditions occur, I would recommend not treating these stands.

Bill Coburn, Certified Forester