

Data Submitted (UTC 11): 3/25/2022 12:37:16 AM

First name: Lynn

Last name: Jackson

Organization:

Title:

Comments: Thank you for the chance to comment on this project.

I have five concerns about the project: Spruce inventory discrepancies, potential removal leaving fewer than 20,000 acres of spruce on the Forest, exceeding 40 acre harvests without authority, your ability to guarantee adequate regeneration in the stands you are treating and a thorough cumulative effects analysis in the EA.

FIA inventories are not interchangeable with FSveg inventories. FIA inventories are at a large scale while FSveg inventory is at a site specific scale. You are suggesting up to 25,000 acres will be harvested from three proposed areas 1) WUI - pure spruce, 2) non-WUI - pure spruce, and 3) mixed conifer. Your FSveg inventory says you may only have 33,000 acres of spruce. The three areas of consideration and harvest in your proposal add up to almost 30,000 acres to be considered for harvest. You might convert 19000 acres of spruce to pine and only have 14,000 acres of spruce remaining on the Forest even though the Forest Plan directs you to retain 20,000 acres of both pure spruce and mixed conifer that contains spruce. I suggest you conduct a full field inventory to confirm the FSveg data and mapped forest types before you select stands for treatment. If you cannot do that, I suggest you reduce the number of treatment acres to ensure that you retain 20,000 acres of pure spruce and mixed conifer containing spruce to result in a reasonable distribution of young and older or old growth spruce.

15000 acres of spruce are included in the suitable timber base. Your statement that Regeneration treatments larger than 40 acres are anticipated is contrary to 36 CFR 219.11(d)(4). I don't believe the Forest Plan contains conditions under which larger size harvests are permitted as an exception to that rule. I suggest you make a concerted effort to meet the Rule or explain your reasons and ask for public comment if you propose regeneration harvests larger than 40 acres.

The Forest has had trouble reaching adequate restocking of forested acres over large land areas and for many years - Jasper Fire and McVey Burn. It is imperative that you conduct and report 5 year regeneration accomplishment on treated acres for this project. Since pure spruce stands have not been harvested for many years if at all, it might be wise to consider reducing the number of pure spruce harvests by 50%. You would have the chance to see if you can succeed in meeting the required regeneration rule of NFMA - 64.51b. Waiting additional years to go in and harvest more spruce would be a short wait and would provide you with proof that spruce can persist after harvest in those stands. If regeneration was unsuccessful, there would be some legacy spruce persisting on the Forest.

Please conduct a thorough cumulative effects analysis of vegetation changes from pine beetle tree loss through the very large stewardship project tree removals for timber and fuels management signed in 2018.