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Comments: Regarding Vegetation Management Treatments

We have experience with the actual impact of treatments, such as the ones proposed, on actual fire behavior during recent catastrophic large fires in the Colorado Front Range. Vegetation management should be conservative and should reflect this actual experience instead of unjustifiably claiming more positive benefits than occur in reality.

Intervention in Lower Montane Ponderosa Pine and Ponderosa Pine-Douglas-Fir forests may very well be justified (based on specific conditions at each specific treatment site) due to interruption through human fire suppression off historical high-frequency fire regimes. The preferred treatment approach should be manual removal of ladder fuels, as use of heavy mechanical equipment damages and compacts the soil, thus significantly negatively impacting the ecosystem. Prescribed fire can also be used. Recent catastrophic large fire behavior has shown that such a vegetation treatment approach can be potentially useful in containing and stopping catastrophic large fire.

Similar comments as in the above paragraph apply to Warm Dry Mixed-Conifer Forests.

Cool Moist Mixed-Conifer Forests extend to elevations higher than the Lower Montane. At these higher elevation fire regimes become less frequent (on average), so the impact of human fire suppression is much smaller to non-existent relative to history. This same observation applies even more strongly to Lodgepole Pine Forests, Spruce-Fir Forests, High Elevation Bristlecone / Limber Pine Forests, and Alpine Tundra. Not only has recent science shown (as the PPVMRP Draft Purpose & Need and Proposed Action document states on page 14) that these forest types "are not as ecologically departed from the natural range of variability compared to the drier forest systems". In fact, they are not departed from the natural range of variability. So, vegetation management within these ecosystems should be avoided so as to maintain these forests close to their natural states. And observations of actual fire behavior during catastrophic large fires in the Colorado Front Range (and elsewhere) show that vegetation management treatments have little to no consistent impact on reducing the dangers posed by catastrophic large fires. In fact, vegetation treatments in these ecosystems are as likely to increase danger from large fires as they are to reduce danger from large fires. This is because the reduction of fuels from treatments within these ecosystems is offset (or more than offset) by the reduction of moisture retention (due to loss of shade from trees) and the increase in wind speeds (due to increased gaps in the forest canopy).

In the ecosystems discussed in the previous paragraph, we should also seriously question the effectiveness and ecological impact of vegetation treatments designed to create fuel breaks along POD boundaries, with the exception of cases where such POD boundaries run along existing roads. However, vegetation treatments along roads the run along POD boundaries need to balance potential positive fire protection characteristics against negative ecosystem and aesthetic impacts.

Invasive plant issues are best handled by minimizing the introduction of such plants and by not driving ecosystems into conditions that encourage the growth of such plants. An important reason to avoid mechanical treatments is that heavy equipment associated with such treatments damages and compactifies the soil, thus creating conditions that are conducive to the establishment of invasive plants. Herbicide treatments should be avoided, as herbicides are poisons that damage the ecosystem in many ways beyond their impact on targeted invasive plants.