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Comments: Comments in regard to the Upper Trout & Bridge Creek Vegetation Management Project

1. The proposal does not treat enough acres to significantly improve the health of the forest in the project area. Based on my observations, the vast majority of the project area is overstocked (unless recently burned in a wildfire). Forested areas with slopes greater than 35% should be treated and not avoided just because of steep slopes. Just this past week the Forest Service National Facebook page has highlighted technics for managing forests on steep slopes. It's time to look at new technology when managing forests on steeper slopes. All plantations and former natural regeneration stands should be thinned with this proposal and the resulting thinning slash treated (unless recently reforested or it is a lodgepole pine dominated stand). Portions of this project area have overstory trees with severe dwarf-mistletoe infections, sometimes both ponderosa pine and Douglas-fir are infected in the same stand. By not addressing overstory trees greater than 21-inch DBH that are infected with dwarf-mistletoe, the stand health will not be improved. Treating the mistletoe is key to improving forest health and employing sound forest management practices. The Forest Service should display the effects of leaving these infected trees by modeling the projected growth and mortality with a growth and yield model that they developed. The Forest Service has decades of research on sound forest management practices for addressing mistletoe infected trees. Portions of this project area are not dry forests; they are colder and moist forest types. It's important to recognize these different stand conditions and not gloss over them in assuming it's all a dry forest type. Look for key indicator plants like *Vaccinium membranaceum* (observed on the 2745 Road) to help determine the different plant associations. Other plants I have observed in the project area include Engelmann spruce, another indicator of a moist and likely cooler site condition. At the highest reaches of this project area subalpine fir could be present. It is not desirable to see Englemann spruce, or subalpine fir removed through a treatment activity as they are not common on the Ochoco National Forest. The native tree, lodgepole pine, is present in the project area and historically was present on higher elevation sites, sites in cold air drainages and sites with seasonally wet soils. Lodgepole pine is very successful at naturally regenerating after disturbance, whether it's thinning or a wildfire. Following the thinning of a young lodgepole pine stand, the created openings of the thinned stand will fill-in with lodgepole seedlings. Lodgepole pine has thin bark whether it's an old tree or a young tree and does not typically survive burning. Be mindful of what sound forest management are proposed in lodgepole pine stands based on the likelihood of success, future culturing needs and the associated expenses. Western larch is also present in the project area and grows quite well on deep ash soils. With time larch develops a thick bark, but as a young tree the bark is thin and is susceptible to burning practices. Site specific prescriptions that recognize the presences of healthy young larch trees and the appropriate fuels treatment are essential to keeping larch alive for future generations.

2. This project needs to treat more acres in RHCAs, especially those areas that are classified as dry forests. The overstocked stands in the project area do not stop at the boundary of a RHCAs. This management induced boundary does not take into account what is best for the coniferous forest near streams and immediate streamside riparian vegetation. Currently many stream reaches have riparian vegetation (trees, shrubs, forbs and sedges) that are suffering in the shade of conifers. If an objective is to have a sustainable riparian forest with specialized riparian species like aspen, cottonwood, willow, and alder for riparian conditions, habitat, diversity, etc. - then the Forest Service needs to provide those riparian trees with the growing conditions that they need to thrive. Treatments in the RHCAs should consider more commercial and non-commercial activities.

3. This project needs to do more treatments to reduce the risk of a stand replacement wildfire, especially in light of the overall steeper slopes of the project area. The above points about treating more forested acres, forests within RHCAs and treating the fuels post-treatment is desirable would improve the fuel conditions in the project area.