Data Submitted (UTC 11): 9/28/2026 6:00:00 AM
First name: Carl
Last name: Struck
Organization:
Title:
Comments: I am generally in favor of this project with several areas of concern. I've been managing our 40 acre Ponderosa forest for over 35 years now and have moved away from burning slash generated by thinning in favor of chipping as it eliminates a number of objectionable problems (smoke, fire risk, burn damage to soils, etc). I bought my chipper in 2012 and have never looked back as it is a far superior way to deal with slash as the photos I've attached attest to. This is what chipped Ponderosa slash looks like after 10-12 years . Note that the chips become incorporated under the forest litter within a few years and greatly increase the ability of the soil to absorb and retain moisture as well as supporting soil biology and returning nutrients to the remaining vegetation. There is a brief (3-5 year) period that fresh chips may pose a reasonable fire risk in the event of a ground fire but the benefits far outweigh this in my opinion. I have learned to chip at the same time as I produce slash as this eliminates labor intensive stacking and chipping green slash is much easier on the equipment and the operator. I have also found chips are a valuable resource to mitigate other management goals such as covering bare mineral soil (cooling and increasing soil moisture as well as kick-starting soil biology). Chipper operator training toward mindful chipping placement and depths are key to maximizing success.

I am also very concerned with the additional road building in our National Forests as this would inevitably lead to soil degradation and erosion as my experience with forest roads that were "decommissioned" has not been favorable.

I have also learned the importance of retaining mature, large diameter trees (18" +) as their large diameter, horizontal branches are high in the canopy and produce invaluable "dappled" sunlight and shade. This attention to retaining adequate shade is pivotal in reducing the over-generation of "dog hair" stands of seedlings which require constant future management which may or may not receive the funding necessary.

Let's not repeat the same mistake made 120 years ago and end up with "dog hair" stands of Ponderosa vulnerable to catastrophic wildfire in our children's future.

Thanks you for allowing me to comment on this plan.

ATTACHMENTS:
IMG_0065.jpg - I bought my chipper in 2012 and have never looked back as it is a far superior way to deal with slash as the photos I've attached attest to. IMG_0062.jpg - I bought my chipper in 2012 and have never looked back as it is a far superior way to deal with slash as the photos I've attached attest to.