

November 18, 2019

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Rick,

John and I were over in the Burnt Beaver Restoration Project area yesterday monitoring the work that is being done. We have concerns and comments regarding what has been done thus far and what is intended to happen in the Burnt Fork drainage.

Project Proposal and Objectives –

The project was proposed by the Evanston-Mountain View Ranger District of the Uinta-Wasatch-Cache National Forest, "to improve big game habitat, reduce conifer encroachment in aspen stands, and manage the risk of hazardous fuel accumulations on National Forest System land. The project area is located in portions of the 111,276-acre High Uintas Inventoried Road Area (IRA) and 7,997-acre Widdop Mountain IRA." The project area is in Summit County, Utah and is about 7 miles south of Lone Tree, Wyoming.

The purpose of the project "is to improve forest health, wildlife habitat diversity and resilience and resistance to catastrophic wildfire at a landscape scale (70,772 acres) by reducing hazardous fuel loads and regenerating aspen in conifer-encroached stands that resulted from previous natural disturbances and insufficient past vegetation management."

Stated project objectives include:

- 1- Improve habitat for big game that are dependent on aspen ecosystems.
- 2- Reintroduce fire to increase aspen regeneration and reduce conifer encroachment.
- 3- Manage the risk of hazardous fuel accumulations to minimize the potential for large, high intensity/high severity wildfires.

The project scoping document states that, "Not taking action would result in the continued decline of aspen. If the action is delayed, existing mixed aspen-conifer stands could cross a threshold causing conifers to dominate further reducing the aspen stands on the north slope of the Uinta Mountains. Because of high levels of fuels across the north slope of the Uinta Mountains, natural resource professionals believe that it is just a matter of time before a catastrophic fire occurs. Treatments would minimize the large-scale effects of wildfire and encourage aspen regeneration. Not taking action would increase the risk of a large severe wildfire that would impact soil health, water quality, air quality, aspen regeneration, wildlife habitat, and scenic diversity and wilderness resources."

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Y2U Observations and Concerns –

In general, we can find no information that vegetation treatments actually reduce wildfire risk and the evidence we have seen indicates they have many negative effects.

Overview-

Walking up the Burnt Fork drainage, Dr. John Carter and I noted a variety of age classes in aspen with recruitment occurring throughout the drainage. It is a diverse forest with low percent canopy cover and sunlight reaching the forest floor, regenerating, multi-aged aspen of younger age classes and multi-age lodgepole pine of younger age classes. Larger Douglas fir and Engelmann spruce occur infrequently along the trail. Beetle-killed trees provide openings in which aspen are regenerating. Down wood provides habitat for wildlife and the dead wood is decaying to regenerate soil. Standing dead trees provide habitat for the many insect eating birds such as woodpeckers. The forest floor of rocky soils is covered with a thin layer of organic material, leaves, grass, conifer needles and low shrubs. Ladder fuels do not seem to be present in the form of thickets of conifer saplings in the understory. Wet meadows are interspersed in the forest along the trail, and the entire trail parallels Burnt Fork Creek, which is partially screened by the trees. That screening provides security habitat for moose and other wildlife that might be using the riparian area. Removing trees as planned and burning the debris will greatly reduce hiding cover for wildlife such as deer, elk, northern goshawk and others. Burning will remove the stored carbon and damage soils in burned areas. The remaining larger trees will likely be subject to windthrow during severe winds. The visual impact will be severe.

Aspen-

We are concerned that the young aspen, which are regenerating in so many areas along this trail will be cut or burned, setting back the already occurring recruitment by a decade or more. We would be opposed to any cutting or burning of aspen or removal of the downed or dead trees in these aspen stands as this is good wildlife habitat. The apparent result of the treatment would be the decimation of aspen in the already healthy stands. In sum:

- Treatment will set the current regeneration of aspen back several years.
- Not a lot of conifer encroachment of aspen stands was noted in the Burnt Fork Drainage.
- There is an open canopy with sunlight reaching the forest floor.
- A variety of age classes in Aspen are already present.

Conifer-

A nice mosaic of conifer/aspen/meadows currently exists in the Burnt Fork drainage. We would prefer to see the smaller diameter (<4 inch) conifer thinned where appropriate versus using a definitive 14' spacing. The 14' spacing that we saw remaining in the already treated Eastern Unit leaves a "tree farm" look that is not natural and does not leave an appealing "scenic" or natural appearance, or for that matter, effective wildlife habitat or hiding cover.

Slash/Dead Fall-

We are concerned that the mechanical “piling” of freshly cut trees (slash) and/or deadfall will compact the soil, cause soil loss through erosion, add excessive amounts of sediment to the stream, remove critical wildlife cover and habitat, and open up the drainage for illegal ATV/OHV use. The burning and mechanical movement of down wood will damage soils. We are unsure what means will actually be used and to what extent. We understand that in the Burnt Fork, no mechanical equipment other than chainsaws or hand tools will be used.

The photographs on the following pages illustrate the conditions along the Burnt Fork Trail and in the newly cut areas along the North Slope Road. The conditions in Burnt Fork show a forest in a mostly early stage of succession, not a mature, closed canopy of conifer with an understory of ladder fuels. This is a diverse mosaic, unlike the conditions we observed along the North Slope Road where a uniform stand of lodgepole is occurring, most likely the result of a past vegetation management project. Much of the area along the North Slope Road lacked aspen and it didn't seem aspen would be occurring along the road in these already treated areas. Burnt Fork conditions existing today should be the goal, not considered a problem to be rectified. The conditions shown in the last photograph of a treatment in another Forest are our fear of what is in store under this project, not only for Burnt Fork but the rest of the project area. How is the effect of any wildfire worse than that photograph depicts?

Please respond to our concerns as soon as possible as the project is already underway. Again, we would request that **NO TREATMENT** occur in the Burnt Fork Drainage. Barring that, we would like to walk the area with you and discuss specific areas where minimal actions could perhaps enhance aspen and leave a diverse forest.

Thank you for your attention to this matter,



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Photographs from Burnt Fork Trail 11/17/19

The following photographs show a diverse forest with low percent canopy cover with sunlight reaching the forest floor, not a closed canopy mature forest. Regenerating, multi-aged aspen and multi-age lodgepole pine of younger age classes occur throughout the trail. Larger Douglas fir and Engelman spruce occur infrequently along the trail. Beetle-killed trees provide openings in which aspen are regenerating. Down wood provides habitat for wildlife and the dead wood is decaying to regenerate soil. Standing dead trees provide habitat for the many insect eating birds such as woodpeckers. The forest floor of rocky soils is covered with a thin layer of organic material, leaves, grass, conifer needles and a few low shrubs. Wet meadows are interspersed in the forest along the trail and the entire trail parallels Burnt Fork Creek. Removing trees as planned and burning the debris will greatly reduce hiding cover for wildlife such as deer, elk, northern goshawk and others. Mechanical equipment will damage the understory and soils. Burning will remove the stored carbon and also damage soils in burned areas. The remaining larger trees will likely be subject to windthrow during severe winds. The visual impact will be severe.



Multi-aged aspen with lodgepole in beetle-killed area (upper). While thinning some of the conifers in these areas might allow more aspen regeneration, removing the aspen in either situation would set back the aspen. Prescribed burning would kill much of the aspen and likely burn the down wood, removing habitat and carbon storage needed for soil building. This is a young forest.



The upper photo shows aspen regeneration and multiple, but young ages of aspen in a beetle kill area that created a forest opening with little canopy to shade the forest floor. The lower photo shows a multi-aged lodgepole stand with some down wood and little in the way of ladder fuels to carry a large stand replacing fire.



Both photographs show more aspen regeneration in beetle killed areas that created an open canopy with some lodgepole. Downed wood and the few lodgepole provide wildlife cover and habitat.



Upper photograph shows young aspen with some larger conifers in the background. These are important for retention for diversity in forest structure and maintaining multiple stand stages for wildlife. Lower photo shows relatively open canopy conditions already existing along Burnt Fork Trail.



Both photos show Burnt Fork Creek meandering through the meadow below..this screening vegetation provides security cover for moose and other animals that might be using the riparian zone. Here a few beetle killed trees are evident, and provide habitat for woodpeckers and other wildlife. Areas such as this are important for wildlife security



Lodgepole understory adjacent to wet meadow showing rocky substrate and shallow soils, with a few aspen and multiple age classes of lodgepole. There does not appear to be a heavy fuel load in such locations and the young lodgepole are sparse, not a thicket of ladder fuels.

Photographs From North Slope Road 11/17/19

These following photographs show the thinning along the North Slope Road. This area appeared to have a uniform age lodgepole pine stand occurring following a previous logging project. The downed trees and remaining spacing reflect the goal described in the Decision Notice, "All units, create a shaded fuel break that would extend up to 150 feet off the North Slope Road and trail systems, remove all hazard trees (dense, diseased, damaged, poorly formed), and open up the canopy to 14-foot spacing. Trees would be piled or lop and scattered and would be burned." This is the fuel break as described, but with the tree spacing, there is little shading or wildlife cover. The recently cut trees and their needles, if left in place, would appear to provide a large fuel source on the forest floor as they dry and the needles remain. If piled and burned, it appears heavy equipment will have to be used, disturbing the soil and soil ecosystem of fungi and bacteria. The burning will create soil damage as the heat may sterilize the soils. Carbon storage will be lost.



Treated area along North Slope Road showing cut trees on forest floor. We are unsure as to whether this is just lop and scatter or whether heavy equipment will move through these areas gathering up all downed wood and piling and burning.



Upper - Another area along the North Slope Road with similar concerns as above. Large amounts of fuel on the ground lead us to believe heavy equipment will now have to be used and will disturb natural features such as boulders, soils and then piling and burning will create soil damage. Lower - from a treatment in another Forest showing the forest floor, piles for burning and soil displacement. Is this what we will see in these treated areas on the North Slope?