August 18, 2023

Gila National Forest

3005 E Camino del Bosque

Silver City, NM 88061

comments-southwestern-gila@usda.gov

Sent via email this date (Silver City West Project Proposal)

Silver City West Hazardous Fuels Reduction Project Comments

Dear District Ranger Toney,

The following comments are made on behalf of the Aldo’s Silver City Broadband, a chapter of Great Old Broads for Wilderness. We thank the Silver City Ranger District of the Gila National Forest for working on a fuel reduction plan to reduce the risk to life, property, and natural resources. We know that forest management is a balancing act that requires a variety of strategies and methods to achieve and maintain healthy forest ecosystems.

We are commenting on this plan because we are concerned about:

1. The use of herbicides for maintenance treatments.
2. Thinning and reducing shrub density to a point that ground temperatures would be increased.

We encourage the Forest Service to abandon the use of herbicides, and use manual mechanical methods for regrowth maintenance. This would provide jobs for residents for several years and eliminate the risk of herbicides getting into the watersheds.

We encourage the Forest Service to limit thinning so that ground temperatures do not increase. The John Muir Project paper “Fuel Reduction Logging Increases Wildfire Intensity” shows that thinning in some areas can increase fire severity and tree mortality. This is due to higher ground temperature and increased wind speed in thinned areas. Forests that burned at high-severity had lower, not higher, pre-fire tree densities and biomass.

This paper also had numerous studies stating that the only way that has been documented and proven to protect homes from fire is " home-hardening and defensible space pruning within 100 to 200 feet of homes." Also, "A modest additional benefit came from prescribed burns less than 1,641 feet from homes."

Additionally, with the climate becoming hotter and drier, stands that have been severely burned do not come back in pines. These stand replacing fires result in the loss of pines because they cannot regrow in hotter and drier conditions. The area becomes scrub oak and mostly nonnative grasses, which are also highly flammable. Tom Swetnam and others from the Laboratory of Tree Ring Research at the University of Arizona have predicted a 50% stand change from trees to shrubs in the Gila National Forest by 2050. Actions that result in increased drying of the land and vulnerability to fire should be avoided.

We encourage the Forest Service to continue working with the groups that are thinning private properties in the WUI and being reimbursed, and having prescribed fires near the WUI over excessive thinning.

Thank you for your consideration of our comments.

Sincerely,

Denise Smith,

Marcia Stout

Co-leaders, Aldo’s Silver City chapter of Great Old Broads for Wilderness