LEFT HAND
watershed center

06/29/2022

To: United States Forest Service
From: Left Hand Watershed Center
RE: St. Vrain Forest Health Project NEPA Comment

Left Hand Watershed Center (the Watershed Center) supports the proposed forest management work on national forest lands in the St. Vrain Forest Health Project area, and supports project goals, which include:

- Improving Forest Resilience
- Restoring Fire Dynamics
- Improving/Creating/Facilitating/Fostering Fire Adapted Communities
- Improving and/or Maintaining Water
- Maintaining and conserving biodiverse ecosystems that provide diverse site characteristics across the landscape
- Promoting resilient social and economic conditions

The Watershed Center is a non-profit organization that aims to protect and restore watersheds for people and the environment, using a collaborative and science-based approach. The Watershed Center leads the St. Vrain Forest Health Partnership, a collaborative of over 100 entities and community members that are working to increase the pace and scale of forest restoration in the St. Vrain Watershed.

In review of the scoping documents, we sincerely appreciate the clear attention paid to the scientific literature and stakeholder values. Further, we are grateful for the dedication that the ARP has shown to engaging stakeholders throughout the development of this project. We congratulate the ARP on the development of this detailed proposal.

We have the following specific comments on the proposal:

1. In the lower montane, shrubland, and shortgrass steppe system, we support tree thinning, slash piling, pile burning, broadcast burning, invasive plant mitigation, sanitation, salvage, and strategic tree planting. We believe the actions outlined in the proposal will help to achieve the project goals.
2. In the upper montane above 9000’ elevation, we do not see adequate scientific consensus in the literature for thinning or developing large gaps and openings in the forest. As stated in the scoping materials, there is insufficient evidence that these areas are outside of the historical range of variability in fire regime and forest structure/composition. Further, these systems are adapted to high-severity, stand-replacing wildfire, and management can often cause increased invasive species abundance due to disturbance. Thus, in general, we feel that thinning and developing large gaps and openings in the upper montane forest would not substantially help to

achieve project goals. However, we do believe there are circumstances where these actions would help achieve goals in the upper montane. Specifically, we support 1) fuels reduction projects in the upper montane directly surrounding homes, communities, and infrastructure (within 300 feet of homes/home ignition zone) and 1,000 feet of communities (as described for POD boundaries in the NEPA scoping documents); 2) building space (~40 meters) around aspen stands to promote aspen growth; 3) fuels reduction projects along POD boundaries that are collaboratively developed and identified with fire districts and local stakeholders; and 4) areas that show clear evidence of historical groupy-clumpy Ponderosa Pine forest structure. Could the USFS define the Wildland Urban Interface (WUI) during environmental analysis, such as considering the distance from a given community where thinning and openings may be appropriate (for example 300 feet from homes and/or 1000 feet from communities)?

3. We recommend that the Forest Service (or a third party entity) conduct robust environmental monitoring, across all systems, to assess treatment impacts on soil moisture, suspended sediment in any adjacent water bodies, invasive species abundance, and native understory species population health. We recommend pairing monitoring/data collection with an adaptive management process that defines thresholds (and related goals) and potential management actions if thresholds are not met/exceeded. In this way, data collection is critical to understanding whether project goals are met, and when course correction may be needed. Further, these data could yield important information for future management actions for all local managers. We also recommend that the USFS (or a third party entity) conduct public education regarding legal use of roads/trails and campfires.
4. We also think this NEPA process could be an opportunity to support effective defensible space creation. To this end, we are wondering if the Forest Service, through this NEPA process, could consider ways to streamline the process for private landowners, watershed groups, conservation districts, and fire/water districts to manage fuels within 300 feet of the homes and/or 1000 feet of communities? There is currently a permitting system in place, but as we understand it, the system is difficult for the Forest Service to maintain, and is largely inaccessible to landowners. We feel that it would be mutually beneficial for all involved to establish a system in which professional managers (watershed groups, conservation districts, fire/water districts) are enabled to act as “resource specialists” and may oversee vegetation treatments on Forest Service lands within the 300 ft defensible space zone. In our opinion, this would help to achieve the project goals and increase capacity for management to occur on Forest Service lands. We think this would be an appropriate program at any elevation/in any forest type.
5. We feel that the following areas should be prioritized for treatment:
    - Shrubland, shortgrass steppe, and lower montane systems (regardless of area type, e.g. research natural area, roadless area), especially surrounding water bodies and infrastructure
    - Within 300 feet of homes and 1,000 feet of communities (see above idea for increasing capacity via watershed groups and conservation/fire/water districts)
    - Areas that build off of existing treatments on private and public lands within shrubland, shortgrass steppe, and lower montane systems or within 300-1,000 feet of homes and communities
6. We feel that areas in the upper montane (above 9000’ elevation) should be left alone with the following exceptions:

- Along ingress/egress routes where those routes are the only option for ingress/egress to a given area
- 40 meters around aspen stands to promote aspen growth
- Within 300 feet of homes and 1,000 feet of communities
- 1,000 feet along POD boundaries
- Areas that show clear evidence of historical groupy-clumpy Ponderosa Pine forest structure
- Managed wildfire to restore historical mean fire intervals where needed/appropriate

7. During the project planning process we would like to see:
   - Opportunities for feedback from area scientists and managers (e.g., from the St. Vrain Forest Health Partnership Science Team)
   - Clear plan for monitoring and adaptive management processes in place, including quantitative thresholds and potential following actions if thresholds are not met/exceeded
   - Opportunities for public engagement prior to project implementation
8. In preparation for fire, we would like to see:
   - Collection of local seed to aid future post-fire regeneration
   - Identification of potential climate refugia (microclimates on the landscape that may support greater productivity despite increasing temperatures and altered precipitation) that can be utilized for strategic planting and restoration
   - Future restoration of sediment catchment zones in rivers and streams where appropriate
9. Additionally, we hope to see the ability for partnering organizations conducting forest management work to utilize temporary (e.g. previously de-commissioned) USFS roads as needed to access other private or public properties.

We thank the USFS for the opportunity to comment on this proposal and look forward to continuing our strong partnership and collaboration on science-based forest restoration projects in the St. Vrain Watershed in the years to come.

Sincerely,

Chiara Forrester, PhD, Forest Program Manager, on Behalf of the Left Hand Watershed Center