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**Warner College of Natural Resources**

**Forest and Rangeland Stewardship**

Colorado Forest Restoration Institute

July 8th, 2022

The Colorado Forest Restoration Institute (CFRI) supports forest management work proposed in the St. Vrain Forest Health Project area. CFRI is a Congressionally-authorized program within the Department of Forest and Rangeland Stewardship in the Warner College of Natural Resources at Colorado State University with the mission to develop, compile, synthesize, and apply locally-relevant science-based knowledge to achieve forest restoration and wildfire mitigation goals.

Several CFRI staff and leadership members have been engaged in the community-driven, collaborative processes leading up to this project through participation in the St. Vrain Forest Health Partnership (the Partnership) and its Science and Community Engagement sub-committees, convened by the Left Hand Watershed Center. We have been continually impressed with the Partnership’s level of engagement and sustained interaction with a broad group of 100+ stakeholders, including neighborhood captains, land managers, scientists and many others. The Forest Service has shown commitment to the Partnership by consistently attending meetings to answer questions, listen, and thoughtfully engage with stakeholder concerns and ideas. Further, we recognize contributions and input from the Partnership and references to stakeholder values articulated by community members throughout the Purpose and Need & Proposed Action documents. Through dozens of meetings, field trips, and webinars, the Partnership and the Boulder Ranger District have set a high bar for how conditions-based management and NEPA processes should be conducted. We look forward to seeing this Partnership continue to play a major role in fostering public engagement and collaborative learning as the project is developed, implemented, and monitored in the future.

The St. Vrain Forest Health Project has the potential to be a case study, and we encourage the Forest Service to work with the Partnership to monitor and document aspects of the project, including but not limited to collaboration, adaptive management, and climate change adaptation. The management and collaborative frameworks developed for this project and through the Partnership will be valuable to other forest management across the region, and it will be important to invest in documenting sharing information with others.

Our comments on the scoping documents are as follows:

1. With conditions-based NEPA, it is important to establish and document a clear adaptive management process to build support for the project. The Forest Service has done an excellent job working with the Partnership to establish a step-by-step process for project implementation and adaptive management and how stakeholders, including the public, can participate. We support the adaptive management outlined in the scoping documents, and encourage the Forest Service to put resources behind the process to ensure that it is effectively carried out in coordination with the Partnership. Additionally, the adaptive management framework has the potential to be a model for collaborative adaptive management statewide and regionally, and the Forest Service should work with partners to track the effectiveness of the framework.
2. Monitoring is an essential component of the adaptive management process and allows managers to sustain transparency throughout the life of a conditions-based NEPA assessment and document. Furthermore, effective monitoring is essential to gather site specific data on conditions prior to implementation and how conditions change over time. We encourage the Forest Service to establish an interdisciplinary monitoring program to thoroughly evaluate treatment effectiveness, ecological outcomes, social and economic impacts, and collaborative readiness with partners. Additionally, a recent wildfire risk assessment has been used to help define conditions on the Arapahoe and Roosevelt National Forests, and we recommend using the assessment as a monitoring framework to track management impacts at a landscape scale. Monitoring across scales must be achieved in coordination with the Partnership to identify monitoring questions, develop plans to answer those questions, and present results to stakeholders.
3. The planning boundary covers a large area and numerous forest types. It can be difficult to find consensus among stakeholders about how management actions should change to align with different ecological conditions and disturbance regimes across different forest types, and specifically to identify the appropriate management actions in higher elevation forests (> about 9,000 feet). The structure, composition and disturbance regimes in high elevation forests have not departed from the historical conditions as greatly as in lower elevation forests. However, with changes in climate, fire management, and human land use patterns, we encourage the Forest Service to approach landscape management taking into account the historical ecology balanced with current and future conditions. This discussion effectively played out through the Partnership, and helped scoping materials focus management actions around values with high wildfire risk such as homes, communities, evacuation routes, and infrastructure. We hope that the final NEPA documents provide sufficient flexibility in treatment options moving forward to address emerging issues.
4. The Forest Service should continue to work with the Partnership to identify specific management strategies that fall under the three climate change adaptation approaches of resist, accept, and direct. The resist, accept, and direct framework was incorporated into the scoping materials with help from the Partnership; however, the specific strategies that are locally relevant need to be identified. The Forest Service should workshop climate change adaptation strategies through partnership and invest resources into experimentation and monitoring to identify the right management actions to adapt forest to climate change. ,
5. Prescribed fire will be an essential tool to maximize wildfire risk reduction, advance fire adapted communities, and manage critical forest processes. The proposed action promotes the wide use of prescribed fire; however, we have rarely seen the large-scale prescribed fire that the project is proposing on the Front Range. The Forest Service should continue to work with the Partnership to explore new opportunities for cross boundary and inclusive broadcast burning that leads to an increased capacity of qualified professionals, community support, and the confidence to safely burn units with higher complexity (e.g., near homes, steep slopes, and large burn units).

Thank you to the Forest Service for the opportunity to engage with this project and provide feedback throughout the NEPA process. We look forward to continuing our relationship with the Partnership and supporting this project for years to come.