



Northeast Area Office
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March 20, 2024

To Whom It May Concern (Attn: James Gerleman),

The Colorado State Forest Service (CSFS) supports the need and the proposed actions identified in the February 29, 2024 Scoping Letter and planning documents for the Lower North-South Vegetation Management project (project). This project aligns with the goals and strategies of the 2020 Colorado Forest Action plan, and the CSFS seeks to continue to be an active partner in the development and implementation of this project and cross-boundary projects in this landscape. This project also affects a significant portion of the Upper South Platte Partnership landscape, and would greatly enhance and build upon the collective efforts of these U.S. Forest Service (USFS) partners. The treatment of the lands identified in the proposed action is critical to protecting our communities, maintaining our watersheds, and ensuring that unique habitats and recreational opportunities remain viable on these landscapes.

We support the use of a wide range of targeted vegetation treatments to reduce the intensity of fires, improve the health of the remaining trees, and increase vegetative diversity. We see that the condition-based management approach will allow for collective priorities in the timing of treatments and allow for flexibility in actions to address the local needs of communities and changing conditions of the landscape, including effects from wildfires and emergent forest health issues. This flexibility is critical in these dynamic environments. We would encourage the USFS to retain that same flexible approach when looking at specific management prescriptions or desired future conditions associated with the identified forest types.

We believe that the Proposed Action will be successful on the landscape if combined with cross-boundary work on non-USFS lands. We encourage the USFS to include the private and non-federal lands within and adjacent to the Lower North-South area boundaries in the project analysis, and on the Vegetation Treatment Map, for the Proposed Action. This would provide the opportunity to treat all lands in a landscape approach, including the use of federal funds on non-federal lands. The potential utilization of the Wyden Amendment authorities, on private and non-federal land within or adjacent to the National Forest System lands, meets the intent of the Wildfire Crisis Strategy (<https://www.fs.usda.gov/managing-land/wildfire-crisis/landscapes>). CSFS understands and supports private property rights and objectives, and believes the project's plan for a wide range of treatments provides the flexibility and alternatives in silvicultural benchmarks that can also meet private landowner objectives for many non-federal lands that could be treated under the Wyden Amendment.

Critical to cross-boundary work will be the potential use of USFS System roads, non-system roads, and even temporary roads for non-federal entities who would be contributing to the protection of the federal lands being analyzed and the landscapes they reside in. We would encourage the timely identification of actions needed for non-federal partners and non-federal contractors to use these transportation systems for treatments on non-USFS lands. We support the project plan to follow the Colorado Roadless Rule (2012), which permits treatment in roadless areas under certain exemptions under this authority. The areas identified in the vegetation management treatment plans within the Roadless Areas must be considered and should be treated to maximize the desired conditions across the landscape.

Thank you for the additional opportunity to provide comments on the proposed action and the effort that the Pike-San Isabel National Forest and the South Platte Ranger District has made to include stakeholder input into this process.

Allen Gallamore
Northeast Area Manager
Colorado State Forest Service