

March 21, 2024

Brian Banks
South Platte Ranger District
30403 Kings Valley Dr
Suite 2-115
Conifer, CO 80433
via electronic portal: <https://www.fs.usda.gov/project/psicc/?project=65019>

RE: Comments on Lower North South Vegetative Management Proposed Action

Dear Mr. Banks:

Douglas County Government appreciates the opportunity to comment on the NEPA process for the US Forest Service's Lower North South Vegetative Management Proposed Action. Douglas County has interest in vegetative management the Pike National Forest as over 26% of Douglas County lies within national forest lands. Many of the County's residents and visitors live, work, recreate or travel through the national forest in Douglas and adjoining counties. Correspondingly, county residents and interests are affected by the potential for wildfire within the national forest in the western portion of Douglas County and the eastern portion of the project area. Of course, the healthier the forests are, the better and more sustainable the wildlife habitat within national forest lands will be.

Douglas County is fully supportive of the proposed desired outcomes and management actions and methodologies that will be approved through this decision and NEPA clearance. These actions are critical in the Front Range Forest landscape. The proposed management actions and strategies align with science and offer models for concomitant Douglas County actions. Proposed actions in this analysis will benefit the citizens and interests of Douglas County, water providers, and others.

Douglas County would like to address one point of concern within this proposed action. That point is related to forest treatments within roadless areas. Figure 2 of the LNS-Proposed Action Purpose and Need summary shows the Rampart East roadless area abuts Douglas County and private land continuously along the SE project area and national forest boundary (graphic enclosed). This area is contiguous with several rural communities, including Woodmoor Mountain, Valley Park, and Perry Park. Douglas County's Sandstone Ranch Open Space and numerous private ranches and rural homes also like within this area. This area is also at high to extreme fire risk (see the enclosed fire risk graphic). By and large, these extreme fire risk conditions exist due to the abnormally dense forests resulting from more than a century of fire suppression. Not only do these dense conditions increase fire risk, but they are also detrimental to wildlife habitat quality; they do not represent the presettlement habitat conditions to which endemic wildlife populations became accustomed over the centuries.

For both forest health/wildlife habitat improvement reasons as well as the reduction of wildfire risk, Douglas County requests that every allowance for timber cutting and temporary road

building under 36 CFR 294 Subpart D be specifically written into the text of the proposed action for treatments within the Rampart East roadless area so these may be reviewed and ‘cleared’ through the NEPA process. Douglas County has a Community Wildfire Protection Plan (CWPP) covering this area that will help meet the requirements of 36 CFR §294.42(C)(1)(ii). The County would like to work with the Forest Service to bring as much of this roadless area as possible back to healthy, presettlement conditions. To reach these conditions, the desired conditions described in the project description, thinning must be done. In many cases, the use (and reclamation) of temporary roads causes less impact to roadless areas than adverse skidding.

To demonstrate our collective commitment to forest health and fuels mitigation, Douglas County is in the process of mitigating hundreds of acres of forested acres on Sandstone Ranch Open Space contiguous with the Pike National Forest. Haystack Ranch, contiguous with both Sandstone Ranch and the Pike, mitigated sizeable acreage in 2023, even using helicopter logging. Perry Park has been mitigating their forested lands for decades. Douglas County recently updated our CWPP and has provided grant funding to offset the costs for local residents to thin the brush and timber on their lands as well. We can mitigate our lands but are completely at the mercy of the Forest Service to clear projects just across the boundary in roadless areas of the Pike. With the steep slopes, dense forests, and beetle kill, these communities are at significant risk.

Once again, we would like to thank the US Forest Service for their diligent work and the opportunity to comment on this proposal. Douglas County has been active in all aspects of the stakeholder engagement process around the Wildfire Crisis Strategy (WCS). Continued partnership with the USFS is critical to wildfire resilience; we will continue to work with you through this process as well.

Respectfully,



Abe Laydon
Douglas County Commissioner

Encl: LNS Vegetation Management Project Purpose and need Summary Roadless Areas Map
Wildfire Risk Map for SW Douglas County

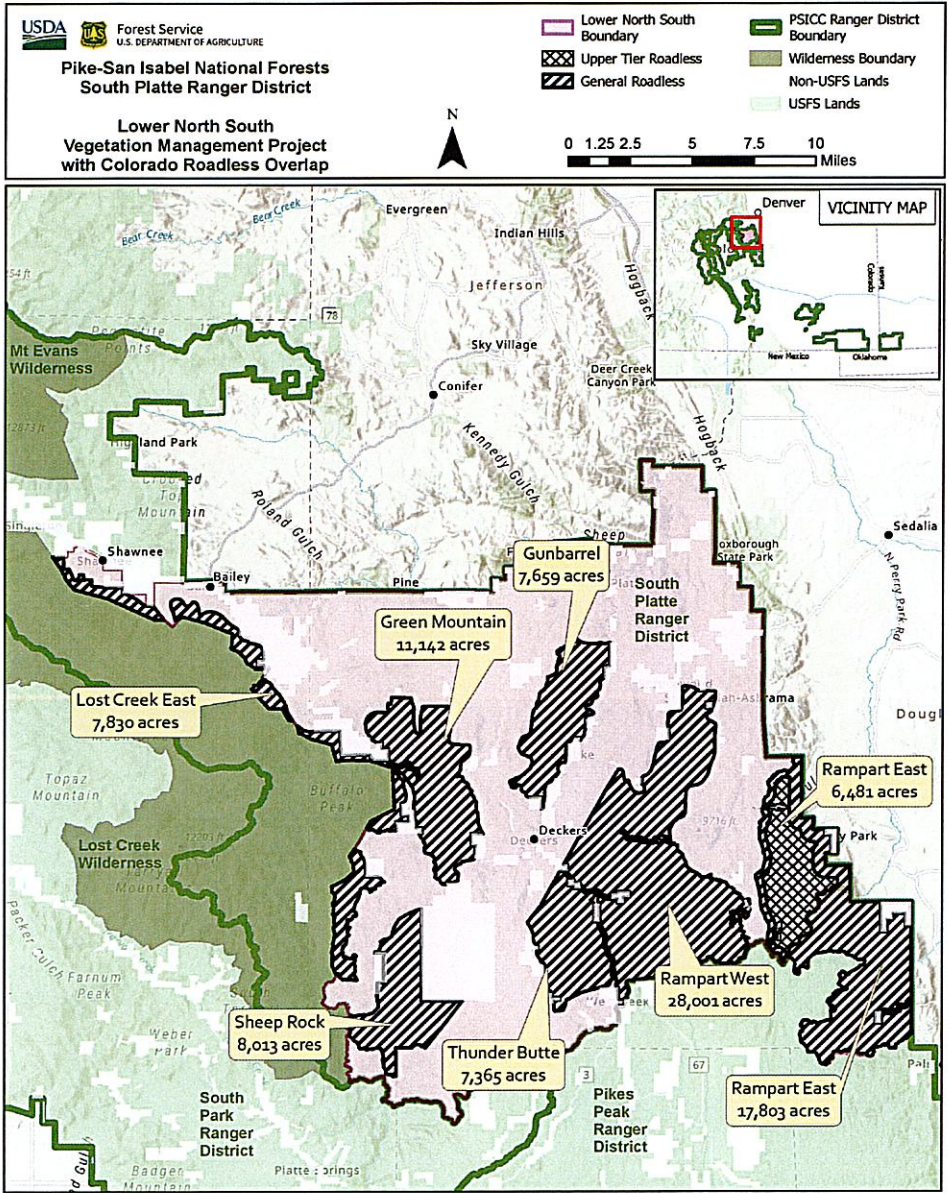
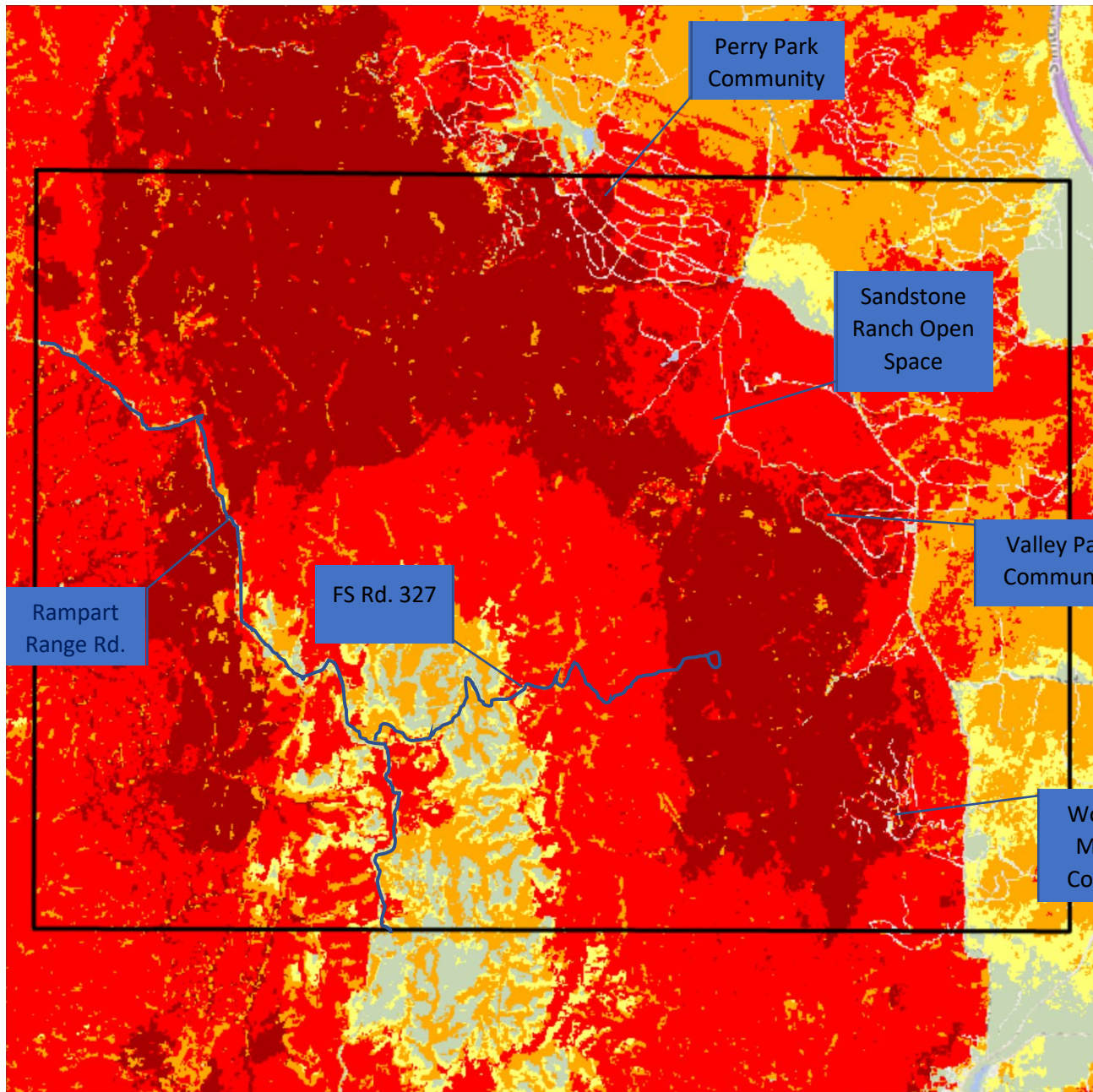


Figure 2. Lower North South Colorado Roadless Areas

Wildfire Risk Map, Western Douglas County

Wildfire Risk

- Non-Burnable
- Lowest Risk
- Low Risk
- Moderate Risk
- High Risk
- Highest Risk



2.55 mi
5480.1 m



Colorado Wildfire Risk Assessment
<http://www.coloradowildfirerisk.com>