



November 21, 2024

To Whom It May Concern (Attn: Amber Wyndham, NEPA Planner - PSICC),

The Colorado State Forest Service (CSFS) supports the need and the proposed actions identified in the February 29, 2024 Scoping Letter, and the proposed actions listed in the November 2024 Lower North-South Vegetation Management Plan (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 local communities, maintaining critical watersheds and water supplies, ensuring that unique habitats and recreational opportunities remain viable on these landscapes, and meeting the goals of the National Cohesive Wildfire Strategy.

We continue to 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 support a condition-based management approach that will allow for collective priorities in the timing and location of treatments, and enable specific activities to meet the local needs of communities and changing conditions of the landscape that include the threats from wildfires and emergent forest health issues. This flexibility is critical in these dynamic environments. We support the USFS management prescriptions and desired future conditions associated with the identified forest types for this project as providing the opportunities to accomplish these important goals.

We believe that the Proposed Action will be successful on the landscape if combined with cross-boundary work on non-USFS lands. We understand that the USFS could not include the private and non-federal lands within and adjacent to the Lower North-South area boundaries in the project analysis, due to the emergency nature of the proposed action. We encourage the USFS, especially the South Platte Ranger District, to continue to look for opportunities to treat all lands in a landscape approach by future NEPA analysis, that would enable 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. We look forward to assisting with these opportunities to expand the Proposed Action on to non-federal lands in the near future.

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 have been considered, and the proposed treatment activities can help 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 develop an effective Plan.

Allen Gallamore
Northeast Area Manager
Colorado State Forest Service