

December 3, 2024

Mr. Ryan Nehl
Forest Supervisor
c/o Amber Wyndham
2840 Kachina Drive
Pueblo, CO 81008

RE: Douglas County Wildfire Action Collaborative Comments on the Lower N/S Vegetation Management EA

Dear Mr. Nehl:

The Douglas County Wildfire Action Collaborative (WAC) is comprised of county and local jurisdictions within Douglas County, Colorado, along with utilities, fire districts, emergency managers, utilities, Colorado State Forest Service, US Forest Service, community leaders, and other stakeholders. Its focus is to collaborate to reduce fire danger within Douglas County through various means. Our most poignant initiative currently is the creation of a biochar production facility to provide a means of disposing of forest biomass generated by thinning operations and to help shift some of the treatment costs from the public sector to the business community. It is in the vein of collaboration that the WAC provides the following comments.

The analysis, science, desired conditions, and treatment priorities are generally sound and well considered. With only minor exceptions, the WAC agrees with the analysis and conclusions.

The WAC greatly appreciates the expansion of treatment options for roadless areas. Options were lacking in previous NEPA clearances, and stymied treatment of many wildland urban interface (WUI) areas in the past. Significant acreage in Douglas County adjacent to mountain communities, utilities, and infrastructure, and in some of our critical watersheds are designated as roadless. They must be treated to both reduce fire risk and to restore these areas to proper ecological balance, which increases wildlife carrying capacity and forest heterogeneity, productivity, and resilience; along with improving other ecological values. Most notably, The WAC appreciates the authorization for temporary road building in roadless areas adjacent to WUI areas and the use of fire as a first entry management technique. Temporary road building with subsequent reclamation does less damage to the forest than adverse skidding, which would be the most likely option otherwise. Also appreciated is the authorization for tethered logging and cable systems, helicopter and aerial yarding, and high floatation equipment on steep slope areas. Significant portions of the WUI and high to extreme fire risk areas in Douglas County have steep slopes, and much is designated as roadless. Authorization of all treatment options across the Pike, and especially in designated roadless areas is greatly appreciated.

Considerable mitigation and forest management work has been done in western Douglas County adjacent to the national forest. Private lands, rural community land, and County-owned lands have been treated. The Colorado State Forest Service (CSFS), Douglas County, and the WAC have been major contributors to this effort. These entities have consulted and provided technical advice, prescriptions, and management plans for much of this work. They have directly managed contractors in completing much of this work. These entities have contributed annual budget and grant money and/or acquired and redistributed outside grants for such work. They, along with rural communities and numerous other stakeholders, have completed various community wildfire protection plans (CWPPs). This has helped to restore forest health and reduced fire risk on lands adjacent to the national forest. The WAC requests that the Forest Service reciprocate and prioritize treatments of national forest lands adjacent to these rural communities and County lands. Synergy can be achieved by all agencies, organizations, and communities working together on holistic, landscape scale treatment and restoration. This is most critical where human life, homes, and critical infrastructure are at risk adjacent to national forest with steep slopes and with high to extreme fire risk assessment designations.

In that same vein, good neighbor agreements (GNAs) or similar instruments are excellent tools to achieve synergy. In some cases, CSFS, Douglas County, and WAC members can expend grant monies for forest treatments across boundaries on national forest lands. In some cases, non-federal assets could be used to conduct treatments on national forest lands. The landowners in the area and all other stakeholders are committed to regional to landscape scale restoration and mitigation of forested lands. Please ensure that sufficient mention of such instruments is included within the EA and that they are prioritized during implementation. The WAC and our various partners are excited about the possibility of future planning and collaboration.

Finally, the WAC would like to emphasize the need for treatment of the easternmost portions of the national forest adjacent to private and County lands in SW Douglas County. Some of these are WUI areas and were mentioned in the paragraphs above, but the emphasis must extend beyond the WUI. Most of this area is assessed at high to extreme fire risk. Much of the Pike's eastern edge is steep slope. A considerable portion is also designated roadless. The combination of high-fire risk stands, steep slopes that will greatly accelerate the advancement of a flame front, and the lack of access for fire suppression in the roadless areas is a recipe for a catastrophic, high-intensity crown fire on par with the Hayman burn. It would be difficult to control. The implications of such a scenario are clear to all.

While it is easier and cheaper to treat flatter, more accessible areas along the Rampart, The WAC suggests that prioritization of treatment in these areas will provide the most risk reduction to the Pike National Forest at large, human life, critical infrastructure, watersheds and water supply, wildlife and habitat, and the resiliency of the forest. Although not as many acres may be treated due to the cost and difficulty of steep slope and roadless area treatment, The WAC propounds that the benefits of reducing the chance of the most catastrophic fire scenarios outweigh the benefits of treating more acres initially but will not reduce the most significant risks as quickly.

Once again, The WAC appreciates the opportunity to contribute to the decision and analysis process of this very important plan. We are willing partners and look forward to continued planning and collaboration with the Forest Service.

Respectfully,

A handwritten signature in blue ink, appearing to read "Abe Laydon", with a large, stylized loop at the end.

Abe Laydon
Douglas County Commissioner and
Chair, Douglas County Wildlife Action Collaborative