



Community Planning & Permitting

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To: Unites States Forest Service (USFS)
From: Hannah Hippely, AICP, Long-Range Planning Division Manager
Subject: Saint Vrain Forest Health Project
Date: 7/8/2022

Boulder County's Department of Community Planning & Permitting has the following comments related to the public comment and scoping materials that we have reviewed related to the National Environmental Policy Act (NEPA) process associated with the St. Vrain Forest Health Project. The public participation process enables critical public review and input, thank you for this opportunity to comment.

This project provides significant benefit for Boulder County and its residents as it helps to improve community protection and safety from wildland fire as well as enhance water supply, recreational settings, and forest and watershed health. The project proposes to implement forest health, fuels reduction and watershed protection treatments across an approximate 66,000-acre footprint of United States Forest Service (USFS) lands within Boulder County. Treatments will be prioritized and strategically placed across this landscape.

This project will focus on priority areas to implement forest management on USFS lands, which will also create opportunities to do cross-boundary management on private (communities and large acreage lands), county (i.e., Heil and Hall Ranch) and other lands. These efforts will increase the pace and scale of forest management to help protect drinking water supplies for Lyons, Longmont, the Saint Vrain Water District, and other downstream communities. The St. Vrain Forest Health project will build on the collaborative process among our many partners (i.e., USFS, CSFS, Lefthand Watershed Collaborative and the NRCS Conservation District) within Boulder County towards shared stewardship.

Boulder County strongly supports the Saint Vrain Forest Health Project (SVFHP). The Boulder County Comprehensive Plan includes goals and polices that speak directly to climate change impact mitigation, environmental health and natural hazard risk minimization, specifically:

- **Recognize Climate Change.** Boulder County recognizes that climate change is having significant impacts on our environmental resources. As the body of climate science knowledge grows and potential effects are better understood, Boulder County shall incorporate the best scientific information into planning and decision-making to adapt to and offset those impacts.
- **Address Climate Change.** Boulder County works to minimize and mitigate the negative effects of climate change-driven hazards on physical, mental, and environmental health.
- **Enhance Environmental Health.** Boulder County shall continue to protect air, water and soil resources and quality, as well as restore resources in a degraded condition to enhance overall environmental health.

- Policies and implementation measures established in the Natural Hazard Element are directed at “mitigating existing areas at risk; thereby minimizing the future loss of life, property and resource damage in the county resulting from natural disasters and hazards”. Wildfire is an identified hazard in this element and element specific goals and policies include:
 - Mitigate Existing Areas at Risk. Efforts to mitigate existing areas at risk to the impacts of natural hazards and disasters should be made to minimize the potential for harm to life, health, and property.
 - NH 5.01 Elevated Risk in Wildland Urban Interface. The county recognizes the wildland urban interface as an area particularly at risk to wildland fires or wildfires.
 - NH 5.02 Fire-Dependent Ecosystem. Fire should be recognized as a natural and/or human-caused occurrence with certain benefits to the ecosystem. The county should strive towards balancing the natural processes of the ecosystem with development concerns so that residents may coexist in a fire-dependent ecosystem.
 - NH 5.04 Interjurisdictional and Interagency Cooperation. Boulder County should continue to encourage interjurisdictional and interagency cooperation to further the goals of protection of life and property from wildfires. The Boulder County Wildfire Mitigation Group should continue to work cooperatively to develop and implement programs to reduce the hazard of wildfire. This should include the following subject areas: public education and awareness, fuel reduction and prescribed burn programs, ecosystem/vegetation management, Wildfire Hazard Identification and Mitigation System, (WHIMS), codes and regulations, and pre-suppression.
 - NH 5.06 Reduction of Wildfire Risk to Low or Moderate Rating. Accepted methods of forest land ecosystem management should be used to reduce all severe wildfire hazard areas to a low or moderate rating, particularly in those areas inhabited with human development as defined by WHIMS.
 - NH 5.07 Forest Management. The county should encourage private and public landowners to manage their forests to preserve the forests’ ecosystem processes by developing and maintaining a diversity of species, ages, and stand densities to serve as a natural deterrent to pest and fire outbreaks.

Technical Comments on NEPA Documents

The executive summary is very thorough and details the scientific methods that would be used to determine treatment priorities and methods, with the use of an adaptive management and condition-based approach.

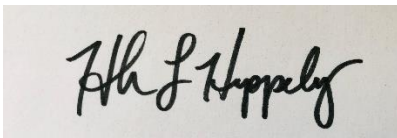
- 1.) When using the condition-based approach would the concepts related to the historical range of variability (HRV) also be considered? Is the condition-based approach and proposed management actions that are targeting desired future conditions using the HRV concept in any way?

- 2.) Missing from this decision is a section that discusses how these proposed treatments would be funded. How is the USFS going to fund the staffing to do project development, project layout, pre-monitoring assessments to determine types of management for best future desired conditions, Scope of Work development for each project, Contractor bidding and award, project administration and reporting. Additionally, what types of funding will be used for contractual costs? Will there be funding to match across-boundary efforts on private lands (i.e., Infrastructure monies, state, federal, NGO, GNA etc.)?
 - a. A basic outline of how the project is projected to be funded throughout the 20-year lifespan of the proposed project. What is the perceived budget to manage and do forest management treatments within 67,000+ acre footprint? Based on multiple cost scenarios for treatment types.
- 3.) Although this is focused on strategic implementation within the USFS lands, the project doesn't address the how the USFS, through partnering and collaborative efforts, may tie in treatments and fill in gaps across-boundary on private lands.
- 4.) Page 26 of the document discusses management actions that will focus on adapting vegetation composition and structure on "anticipated climate change impacts". It would be helpful to have a discussion on what the anticipated climate change impacts could be and how these changes may affect the vegetation and its structure:
 - a. For example: Does this mean that over time with climate change that the forests can be impacted by larger epidemic levels of insect and disease that can be stand replacing?
 - b. Will fires be more frequent and catastrophic?
 - c. Will we see a decline in tree/veg health over time due to lack of water?
- 5.) On pages 27-28 there is a discussion the use of prescribed fire after every treatment. That seems like a broad statement although this language is prefaced with some other language.
- 6.) Under Methods and Equipment-include the use of helicopter logging, tub-grinding to be utilized as mulch, compost, animal bedding etc.
 - a. Address wood utilization challenges and how these challenges will be considered (cost, hauling, lack of wood utilization industry in Colorado for small diameter sized wood etc.).
 - i. Suggest including a list of what methods of wood utilization methods will be researched and considered to offset having to always resort to pile burning.
 1. Tub-grinding and hauling to mulch and compost yards (i.e., A-1 organics).
 2. Could part of this proposal include investing in a centrally located sort and utilization yard?
 3. Curtain burner
 4. Biochar

- b. Pile burning is seemingly, becoming more and more difficult to complete in a timely manner with smaller burning windows during the winter. There is also the concern about smoke dispersion and even more importantly thousands of piles across the NF not getting burned.
- 7.) The decision should address/discuss how operational issues such as: pile burning, prescribed burning, smoke dispersion, truck traffic, main haul routes (if hauling wood or woody material), noise etc. will be addressed. Particularly in project areas that are in and around communities, private lands, and recreation areas. What will the impacts of these operations to the public be and how does the USFS propose to address them-is there a plan?
- 8.) In concert with the proposed action, Boulder County and other land management entities are working to decrease fire hazards. There are many access issues to isolated parcels. Missing from this decision are ways in which these other entities can temporarily access to complete work on their properties. There are closed roads, roads in storage, and other access points that should be addressed. To complete landscape scale mitigation and to mitigate these sites for fire hazard, overtime, anything from survey crews, hand crews, trucks, and equipment may be needed. These roads depending on their current USFS status would not need to be opened in perpetuity and would be closed afterwards to appropriate status.

Boulder County encourages members of the public to participate in the NEPA process by reading the documents and providing comment. Visit the USFS website www.fs.usda.gov/goto/StVrain, for more information. Boulder County supports this process, including the public engagement and input opportunities, that will help to inform the proposed project Scope of Work and processes.

Sincerely,

A rectangular box containing a handwritten signature in black ink. The signature appears to read "Hannah Hippely".

Hannah Hippely, AICP
Long Range Planning Manager