

Data Submitted (UTC 11): 12/4/2024 11:59:35 PM

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Comments: I am writing with regards to the Lower North-South Vegetation Management Project (65019) proposed by the US Forest Service (USFS).

This 261,096-acre project is slated to take place within the Pike and San Isabel National Forests and is focused specifically on reducing high-intensity wildfire risk. These forests encompass a broad range of elevation changes as they spread from the foothills into the Rocky Mountains and include the Arkansas and South Platte Rivers. This diversity of terrain contributes to a wide diversity of forest types, which in turn host a variety of resident animal species, including the Mexican Spotted Owl, the Preble's Meadow Jumping Mouse, and the American Goshawk.

While it is appropriate for the USFS to act to protect communities from the risk of wildfire by using controlled burning, there are two major omissions with this vegetation removal project that require consideration. These are making sure old-growth trees are not cut down and addressing the risk to threatened species.

Old-growth trees are more resistant to fire, drought, and changing climates than younger trees, and they are one of the most effective filters for replenishing clean, safe drinking water. They have also been shown to take up more carbon as the age (>20 years). The benefits they provide to the forest when left standing outweigh the risk of them contributing to wildfire spread; while there is a 100% chance that a tree will die when marked for logging, there is a less than 100% chance that a tree will burn if left standing.

Another issue with this project as it is proposed is that it does not explicitly address the potential impact of logging on wildlife. Information on the habitats of at-risk species tells us that there are likely to be significant detrimental impacts on numerous species. Both the Mexican Spotted Owl and the Preble's Meadow Jumping Mouse are listed as threatened under the Endangered Species Act. The American Goshawk, while not threatened, is considered a rare species for this area, and so the utmost care should be taken in ensuring its continued presence in these forests.

The US Forest Service absolutely has a responsibility to take action to protect the people of Colorado from the dangers associated with severe wildfires. But it is also the agency's job to use the best available science. As proposed, this project does not include any specific protections for old-growth trees, nor does it address the impacts of the logging on threatened and endangered species.

I would ask that the USFS consider upgrading this project to an Draft Environmental Impact Statement (DEIS) from the current Environmental Assessment so as to more thoroughly take into consideration protections for old-growth trees and threatened and endangered species.

Thank you for providing the opportunity to give my feedback on this important project.