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February 23, 2016

Ms. Sylvia Clark District Ranger
Boulder Ranger District 2140 Yarmouth Avenue
Boulder, CO 80301

RE: Forsythe II Project Proposed Action Dear Ms. Clark:

The Boulder County Forestry Staff has reviewed the proposed Forsythe II Project set forth by the Boulder Ranger District (BRD) of the Arapaho and Roosevelt National Forests. We support the efforts of BRD to reduce wildfire risk and are willing to partner in efforts that border our 2, 187 acres which were referenced in the project location. Boulder County Forestry Staff has already been completing similar thinning and cutting prescriptions in the Reynolds Ranch area and has plans to complete work in the Meyers Ranch portion of Walker Ranch just east of the proposed action.

From a silvicultural (applied forest ecology) perspective the proposed project makes sense. The project description does a good job of explaining the different treatments planned for the varying vegetation types while also understanding that sometimes these vegetation types are not found uniformly within one area. Overall the proposed project should help mitigate risks (wildfire, insect and disease) by improving the age, species, and size diversity across the landscape, creating a mosaic forest structure that is better able to withstand these natural disturbances.

One significant concern regarding forest treatments is the management of slash. Slash piles left across the landscape for long durations can increase fire hazards, decrease aesthetics, and increase noxious weeds. We urge the BRD to ensure you are able to support the economic feasibility of burning slash piles, and actively complete this in a timely manner on treated lands. As a part of the proposed action we recommend BRD maintains an active slash pile reduction program while also holding strict standards for post treatment rehabilitation of these piles to minimize the adverse effects.

Boulder County forestry staff appreciates the open communication between the public and BRD on the proposed project. The field trip on September 26 provided a learning opportunity for the public and allowed for discourse regarding the proposed actions. With the planned 'leave tree marking' we believe that the public will have a clear opportunity to see what is being removed from a particular treatment area, especially when these areas are found near neighboring properties. Previous designation by prescription/description work (no markings) without constant direct oversight can lead to misinterpretations by contractors and subcontractors leading to a multitude of issues, and as land managers we have seen this for ourselves.

Despite these efforts there exists a low level of trust among some members of the public that the proposed forest treatments will be executed in a manner consistent with the project plan and expected outcomes. We would

recommend that in all phases, but especially in the first phase of the project implementation, the BRD includes extensive communication with the public regarding what the treatments will look like on the ground. We would also recommend that timely

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monitoring of all contractor activity occurs to ensure that what the public and BRD expect from the treatment is reflected on the ground. If this project is to be successful it needs to be completed in a manner that meets everyone's expectations and extensive, on-going monitoring will be necessary.

The Private Home Defensible Space concept in the plan is also a very important piece of the proposed action as it yields a strong collaborative effort. Wildfires and other natural disturbances do not stop at property boundaries and neither can defensible space and landscape forest management. Allowing neighboring properties to extend their defensible space onto Forest Service lands where necessary and completing fuels reductions where appropriate will only strengthen the defensibility of private structures. Similarly we have worked closely with Rocky Mountain Fire Protection District to develop an MOU in order to allow them, working on behalf of Walker Ranch neighboring landowners, to complete defensible space activities that extend onto County lands.

We appreciate the opportunity to provide comments and look forward to working with you on the implementation of the proposed project.

Sincerely,

Stefan Reinold, MS, CF
Senior Forestry Resource Specialist Boulder County Parks and Open Space Resource Management Division