



January 9, 2017

Strategic Planning-Objections Reviewing Officer
USDA Forest Service, Rocky Mountain Regional Office
740 Simms Street, Golden, CO 80401
Via e-mail: r02admin_review@fs.fed.us

Attn: Objection Reviewing Officer: Brian Ferebee

The Town of Nederland Parks, Recreation and Open Space Advisory Board (PROSAB), in its third communication related to the Forsythe II proposed action, would like to express its strong support for the project as outlined in the Draft Decision released on Dec. 6, 2016. The Nederland Board of Trustees concurs, and affirms the points of this letter, understanding the role we all play in stewardship of our local forest.

We appreciate the Forest Service's effort to gather public input on this important project and for addressing concerns previously noted in our January 2016, letter related to the project. Specifically, we appreciate that the Draft Decision included our request to reduce the patch cut size to 30 percent. We also appreciate the Forest Service's addition of design criteria, specific to the Forsythe project.

We would like to take this opportunity to reiterate our concerns, as then listed and expanded below based upon clarifications offered by our residents during a public hearing conducted by the Board of Trustees on January 5, 2017. This letter is meant to both convey our understanding of the importance of fuels mitigation work on a landscape scale and to support responsible, transparent planning and oversight for such work.

Defensible Space – We particularly welcome the provisions to work with homeowners to extend defensible space into surrounding Forest Service lands and would like to see this become a standard element of Forest Service fuels reduction projects in the WUI. We understand this element has been added to the Draft Decision released Dec. 6, 2016. It was unclear to our residents that this has been included, however, given that it does not appear clearly in the accompanying map. We would request that be amended. Of

particular importance to our community is the allowance for 300 feet worth of defensible space treatment into forest lands from structures in all of the treated units adjacent to Nederland.

NFPD CWPP – We also sincerely appreciate the willingness of the Forest Service to support objectives of the Nederland Fire Protection District Community Wildfire Protection Plan by inclusion of treatment units in Forsythe II that lie in areas designated as landscape-scale fuel breaks in the CWPP. The CWPP informs Nederland-area wildfire mitigation efforts and is incorporated by reference into the Town of Nederland Comprehensive Plan.

We appreciate the Forest Service including these fuel breaks in the Draft Decision. We feel that it is critical that the units surrounding Nederland's Big Springs neighborhood be treated as prescribed in the proposed action.

We have heard many concerns from our residents that all treatments are maintained after initial work, and that particular attention be paid to drainage and erosion prevention plans, particularly in the steep slope areas of Unit 1 (also known as 123 Peakview Drive). The neighborhood experiences flash flooding due to the nature of these slopes, and we would appreciate all care taken to prevent exacerbation of this problem during and after fuels mitigation work. Particularly difficult are areas with north-facing slopes, as reported by neighbors.

Lodgepole Pine Stand Treatment – The lodgepole stands that fall within the boundaries of areas designated in the NFPD CWPP as fuel breaks (units 1, 2, 3 and 63) contain numerous small remnants of aspen clones. We urge that care be taken to identify and encourage regeneration of these clones with a goal of establishing aspen as the dominant species in these units, if practical.

We would like to formally request all efforts to be made to maintain the diversity of mixed conifer environments found in the Nederland area treatment areas. We also note that replanting of mixed conifer in the treated lodgepole units might negate the goal of changing the fire behavior, and we urge the Forest Service to review the most recent science regarding how to manage path/clear cuts buffers in the WUI.

Treatment Area Edges – We appreciate inclusion of plans to contour the edges of patch and clear cuts to avoid straight lines, as requested in our January 2016 communication.

Blowdown – The value of down timber as habitat and future soil amendment needs to be balanced against the negative aesthetics of jackstraw timber in highly visible/heavily recreated zones, as well as potential fuel ignition. Numerous complaints have been heard about down timber in treated areas of West Magnolia.

Slash Management – We understand the Forest Service's commitment to better management

of slash piles resulting from previous fuels mitigation work, and we would like to reiterate this concern in relation to the work proposed at Forsythe II. We would like to formally request quick action to eliminate slash piles after their cure period and to manage the depth of slash throughout the treatment area. We heard many concerns about the proposed depth of slash left in treatment areas that may become a source of ignition or fuel for fire.

Emergency Egress – We previously requested the inclusion of two emergency egress routes for the Big Springs neighborhood, in the case of a wildfire emergency, after decades of Town efforts to secure such a route. We are very grateful to see both included in the Draft Decision, especially in light of the Cold Springs Fire that erupted in July 2016, at one point threatening the Big Springs neighborhood. Work has begun already on a concept plan for one of the two routes -- at Doe Trail -- and we look forward to continued collaborative efforts with our partners, the Forest Service and Boulder County, in making at least the first of these routes a reality in 2017.

Wildlife - We note that the Draft Decision dropped the Forest Plan to enhance wildlife habitat, and our citizens expressed concerns with this change. We understand the logic that WUI fuels treatment and wildlife enhancement are sometimes and in some locations incompatible goals, but we urge the Forest Service to make every effort to minimize wildlife habitat and disruption.

Thank you for the opportunity to comment. We want to again express our strong support for the Forsythe II project, including the Nederland area work included at our request, in support of our Community Wildfire Protection Plan.

We accept the invitation of the Forest Service to help design and oversee those facets of the project that are adjacent to and affect Nederland residents. We continue to recognize the importance of fuels mitigation to the overall health of our forest and safety of our community, including providing defensible space wherein our firefighters may work should fire emerge in our area. We very much value the collaborative relationship we have been able to develop with our regional Forest Service staff under the leadership of Boulder Forest Ranger Sylvia Clark, and are committed to furthering this relationship into the future.

Sincerely,



Dallas Masters, Town of Nederland Trustee and Nederland PROSAB Chair on behalf of the Nederland Parks, Recreation and Open Space Advisory Board
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