

Lower North-South Veg.gmt. Alternative Discussion, 11/30/23

Attendees: Brian Banks, Jim Gerleman, Michelle Putz (note taker), Beth Davis

We received comments from CO State Forest Service suggesting that the LNS project include treatments similar to LNS (and analysis of that treatment) on private land within the project area. This meeting was designed to discuss whether this proposal should be included in the LNS analysis.

The group acknowledged that this idea has some validity and would have some benefits.

After discussions with NEPA folks on our Forest and at the Regional Office, Michelle found:

- We probably could include it as a modified proposed action (especially because we have another scoping period)
- We would need to go back through WO to verify emergency declaration – Lillis at the RO felt they would approve any changes but that it would take some time to verify.
- Lillis pointed out that because there is an emergency the NEPA analysis/decision (and project) needs to be completed quickly

The team discussed the proposal and found many challenges to incorporating the State's proposal. Most of the challenges related to timing of this suggestion:

- Time/emergency – coming up with an alternative or modifying the proposed action will take extra time, time that we don't have if we want to get this analysis done quickly so we can begin implementing in 2024. Similarly, analyzing effects on private land in addition to NFS lands will take extra time.
- Private interest/lack of "scoping" – because this suggestion was brought up after scoping (and a collaborative process), we don't know if there is truly interest from private land-owners to do this work on their land because we have not brought the idea up with them. Proposing treatment now on private land would be a surprise, one some private land-owners would not appreciate. And this proposal might not even lead to any work on private land; if so, any extra work we did/\$ spent in analyzing now would be money not well-spent by the US government.
- Other opportunities to meet the same need – if we determine there is a need *and* we find enough landowners with buy-in to warrant it, we can do separate analysis (including potentially CEs) for those areas. Additionally, there may be other opportunities to get funding for private treatments and other, quicker, help (NRCS as an example) to get private lands analyzed under NEPA
- Cost and Contract NEPA – Unfortunately, we don't have unlimited money to do surveys (i.e., at this time, we have no idea if we could fund surveys for TES species or historic/prehistoric resources on private land; without those surveys, no work could get done on private land). Additionally, this NEPA is being done by a contractor who may or may not have experience with this kind of proposal. We've already let this contract. To add this proposal and it's analysis would likely require extra funds be added to the contract and extra time to figure out the adjustments to the contract.

Decision: Given the challenges stated above, Brian decided not to include the State's proposal to add similar treatments and related analysis on private land within the project area. We will document that as an alternative considered but eliminated from detailed analysis with an explanation of why we did not analyze in detail. Because Lillis offered to help write that explanation, Michelle will share these notes with her and ask for her help.