Boulder County Nature Association (BCNA) thanks the USFS for the opportunity to comment on its NEPA documents for the Saint Vrain Forest Health Project. Comments are presented below by document.

Comments on the Story Map

This is an excellent piece that summarizes very well the project and its intent. It is very clear, except for the statement that says "you won't see blobs on the map with proposed treatments". This statement needs an explanation. It easily could be the explanation presented in the USFS Scoping Letter, page 4, Implementation Framework.

Comments on the Scoping Letter

This is a very clear and effective NEPA scoping letter. Well done.

Comments on Purpose & Need and Proposed Action

This is a very well organized, clear and thorough document.

BCNA has one comment for the USFS to consider that deals with the protection of habitat and wildlife during development of preliminary management actions (Step 1). On page 44, the document states that the USFS would identify and evaluate potential undesired outcomes of actions such as unauthorized recreational use. BCNA supports this approach and requests the USFS to apply it as a management guideline (maybe as a preliminary design feature) when it comes to mountain bike trails, especially the creation and use of unauthorized social trails.

The number of unauthorized, illegally constructed mountain bike trails is growing in the area, especially in the North Saint Vrain watershed.

* These trails may not be compatible with treatment objectives, including the stated purpose and need "to improve forest resilience".
* They also are definitively not compatible with the stated purpose and need "to maintain and conserve biodiverse ecosystems". Social trails are adversely impacting ecological function by destroying habitat and causing habitat fragmentation, particularly in important habitats such as Research Natural Areas, Core Habitat, and Forested Flora and Fauna. Increased recreation access in such areas is inconsistent with Forest Plan direction.
* In addition, they increase sediment runoff and stream sedimentation, which runs counter to the stated purpose and need " to improve and/or maintain water security".
* Furthermore, they are adversely impacting other recreational uses such as hiking, wildlife viewing and photography, which runs counter to the stated purpose and need "to promote resilient social and economic conditions".

This makes unauthorized mountain bike trails incompatible with four out of the six purposes and needs. Therefore, BCNA requests the USFS to control the growth and use of unauthorized mountain bike trails when they develop forest health management actions. Such controls would meet the stated purpose and need of the Saint Vrain Forest Health Project.