



ST. VRAIN AND LEFT HAND WATER CONSERVANCY DISTRICT

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August 29, 2023

To: United States Forest Service

From: St. Vrain and Left Hand Water Conservancy District

Re: St. Vrain and Left Hand Water Conservancy District St. Vrain Forest Health Project Draft Decision Notice Comment

The St. Vrain and Left Hand Water Conservancy District (“District”) supports forest restoration work on national forest land in the St. Vrain Forest Health Project (“Project”) area because it aligns with District goals and objectives to protect, conserve, and maintain healthy water resources for District constituents and the environment. Furthermore, the Project will enhance the pre-fire mitigation treatment already being done by the District and the St. Vrain Forest Health Partnership (“Partnership”).

The District commends the U.S Forest Service (“USFS”) team for a comprehensive Environmental Assessment (“EA”) and Draft Decision Notice (“DN”) founded in scientific literature and strong stakeholder engagement.

Support

The District supports several components of the DN to work “together to restore landscapes...while proactively minimizing risk to watersheds and communities” (pg. 3). The District fully supports a robust strategy to gather data to establish baseline environmental conditions across watersheds, continuously monitor treatment areas, and inform adaptive management triggers. The DN highlights that “short term impacts of fuel treatments are likely to impact soil and water resources [only] at localized scales” (pg. 9), and a strong monitoring and adaptive management program will ensure minimal impacts to “the broader area and downstream resources” (pg. 10).

Areas of Concern

The DN states that “Monitoring results will be shared with the [St. Vrain Forest Health] Partnership and public annually and inform collaborative discussions on adjustments for future management actions” (pg. 10). Sharing data at annual intervals may limit immediate and necessary adaptive management as well as transparency with local partners. The District suggests hosting all data on a public-facing platform, or at least one accessible by the Partnership for peer review and input in real-time.

The District also submitted EA recommendations that: 1. the USFS partner with water districts and their partners to manage fuels on USFS lands that align with Project goals, and 2. The USFS conduct public education regarding legal use of roads/trails and campfires, especially in areas where treatments may facilitate increased illegal use of public lands. Both comments received USFS response that “this issue is beyond the scope of this project.” The District requests the USFS elaborate as to why, in regards to #1 above, the protection of water resources and partnering with districts that have jurisdiction/authority is outside of the scope of the project. .

The District is grateful for the USFS team's dedication to developing the EA and DN, and the opportunity to provide these comments. The District looks forward to future opportunities to work with the USFS to implement this Project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sean T. Cronin".

Sean T. Cronin
Executive Director