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Comments: We appreciate the opportunity to comment on the North Valley Trails Project. We have two comments on specific parts of the proposed trail plan and then comments about the process.

Brush Creek Trail

A portion of the proposed Brush Creek Trail, see map 1 on the attachment, goes directly through a long-term RMBL research site and as proposed destroy the research site. The research site is permitted through RMBL's special use permit with the USFS and has existed in that location for 10+ years. As part of its annual work plan RMBL has regularly provided information, including location, of this research.

RMBL has extensive research on USFS and we anticipate that land use improvements will occasionally be necessary, we strongly request in this instance that the trail be re-routed, either pulling the trail closer to the road, or alternatively, following CBMBA's proposed trail solution that was designed to avoid this research site by pulling the trail further up. We base that on the following reasons:

1. There are reasonable alternatives to the trail location, one of which would greatly enhance the value of the trail to people using it, and the other alternative reducing the ecological impact of the trail by reducing habitat fragmentation. Map 1 shows in pink those alternative routes.
2. This is a long-term project with an investment of over 10 years by the research scientist, Dr. Jessica Forrest (University of Ottawa). Long-term projects are particularly valuable and difficult to foster.
3. This is a high-quality research project as evidenced by the publication track record of the scientist, the support she receives from the Canadian government for the research, and the reviews of her research conducted by RMBL.
4. This project is focused on monitoring solitary bee populations with a goal of documenting population trends as well as understanding environmental drivers of population dynamics. As such, it fits well within national priorities established through the Office of the President of the United States. "The National Strategy to Promote the Health of Honeybees and Other Pollinators" was issued on March 19, 2015 by the Pollinator Health Task Force, which was co-chaired by the Secretary of Agriculture. This report, pg. 17, prioritized monitoring of population trends. Additionally, the report emphasized the importance of support provided by the National Science Foundation for the training of future pollination biologists, pg. 22, as well as the role of private-public collaborations, pg. 25, in achieving national objectives. The accompanying "Pollination Research Action Plan" identified that one of the roles for the USFS in supporting the national agenda is in supporting baseline data and population trends. Because of the uniqueness and scientific quality of this project, moving the trail to avoid the long-term study science has large national value at relatively low cost.

If the USFS has questions about the quality and importance of the research, we encourage you to consult with pollination experts. For example, you could consult with the Bee Lab in Logan, Utah that operates through Utah State University and is part of the USDA Agricultural Research Service.

Budd Connector

In similar fashion, the Budd Connector trail and associated parking lot are placed in very close proximity to another long-term research site operated by Dr. Emily Mooney (Colorado State University) for 10+ years, see the area of concern shown by the blue circle on Map 2 of the attachment. This research project has been permitted through our special use permit and disclosed, including the location, through our annual work plan with the USFS. The quality of this project is also established based upon the publication record of the science, federal funding of her research through the National Science Foundation, and review of her research by RMBL.

We recommend some potential measures to reduce the impacts of the improvements on the project.

1. We recommend moving the trail away from the research sites, to help establish a buffer between recreation and the research, to a distance similar to what was proposed by CBMBA.
2. We recommend reducing or shifting the parking area to establish a similar buffer between parking and the research site.
3. We recommend establishing a connector trail between the end of the parking lot and the trail that avoids the research sites. The proximity of the day use area and the trail are such that social trails will develop regardless of whether the USFS plans for them. By establishing a trail, the USFS can guide use to reduce impacts on the research site.
4. We encourage the USFS to establish a barrier, such as fencing, on that side of the day use area to minimize the emergence of social trails leading to the new trail that will impact the research sites.

General Comments about the Process

Given the extensive planning and stakeholder engagement involved in developing these proposals, which led to CBMBA altering locations to minimize impacts, we were surprised to see the USFS release a proposal that substantially deviates from that public feedback in ways that are not transparent. Additionally, given that we have provided the locations of these research sites to the USFS, we were surprised by the realignment. In the future, we would recommend:

1. Stronger weight should be given to proposals that are vetted through STOR. The community has put considerably effort in establishing STOR and creating a community-wide process for engaging diverse stakeholders. We encourage the USFS to minimize changes that have been vetted by STOR and to clearly and transparently document why such changes were made.

2. We would request that RMBL be consulted for proposals that involve improvements directly on top of ongoing research sites covered under our special use permit. We are not requesting that research sites be completely avoided, but we would ask to be consulted on the impact of the proposed improvements to the research, the scientific and societal value of the research, and suggestions for how to mitigate impacts.

We appreciate the opportunity to comment and encourage the USFS to consider ways to allow the improvements to move forward while minimizing other impacts. If you have any questions or we can provide more specific feedback on how to avoid impacts on these long-term research sites, please do not hesitate to contact me.

USFS Added for coding of attachments:

Attachment: North Valley Trails Map of Upper-Upper Brush Creek Trail with notes of proposed trail alignment and research areas