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To: U.S. Forest Service, Arapaho-Roosevelt National Forest

Thank you for the excellent public outreach and opportunity to comment on the St. Vrain Forest Health Project. The Scoping Comment letter, Purpose and Need and Proposed Action document and associated appendices are well written and organized to facilitate understanding the project.

Overall, I support the project's six goals and the proposed actions. I also support the conditions based approach for the project. In addition, I offer the following specific comments.

1. It is good to see the attention given to Rocky Mountain bighorn sheep and potential habitat improvements in Appendix A's Condition Based Management Guide (CBM) for the North St. Vrain Research Natural Area (RNA). The proposed actions have the potential to improve and restore bighorn sheep habitat while at the same time improve forest resilience. However, it is surprising, and possibly an oversight, that timing restrictions for management actions within bighorn sheep habitat are not listed in the North St. Vrain RNA CBM or in Appendix C: Terrestrial Wildlife 6 - Timing Restrictions. Bighorn sheep winter range and production areas exist within the project area, primarily in and adjacent to the North St. Vrain RNA. Timing restrictions for bighorn sheep production areas and winter range are available from Colorado Parks and Wildlife and should be added to Appendix C. Specific to bighorn sheep production areas, timing restrictions should exclude management actions and human concentrations within one mile sight distance of lambing areas from May 1 to July 15. Applicable Forest standard and guideline are:

102. (ST) Restrict new developments, including new facilities, roads and trails, and concentrations of humans, within a one-mile sight distance of bighorn sheep lambing and mountain goat kidding areas if they would adversely impact lambing or kidding. Restrictions on activities are usually required from May 1 to July 15.

103. (GL) Maintain the function of key or unique habitats such as primary feeding areas, winter ranges, riparian habitat, breeding areas, birthing areas, rearing areas, migration corridors, animal concentration areas, wooded draws, and riparian areas. Human disturbance should be minimized during periods critical for wildlife.

2. Appendix B: Invasive Species Management Card: I appreciate and support the proposed methods to manage and control invasive weeds during the project. Although not specifically listed, it is worth confirmation that domestic sheep and/or domestic goats will not be used for invasive species and noxious weed control anywhere within the project area due to the risk of disease transmission to the St. Vrain bighorn sheep herd and adjacent bighorn sheep herds within Rocky Mountain National Park. There is more than ample peer reviewed scientific literature documenting disease transmission from domestic sheep and goats to bighorn sheep resulting in respiratory disease outbreaks followed by years of poor lamb recruitment.

3. The last paragraph on page 19 of the Propose and Need and Proposed Actions, recognizes the "non-system trail use and unauthorized trail construction" that occurs within the project area, however no management actions are offered to manage and control unauthorized trails. Over 40 miles of unauthorized single-track trails occur within the northern quarter of the project area. Most of these unauthorized trails were illegally constructed for mountain bike use. The significant mileage of unauthorized single-track trails may not be compatible with the goal to improve forest resilience and is clearly not compatible with the goal to maintain and conserve biodiverse ecosystems. Unauthorized trails result in habitat fragmentation and reduce effective wildlife habitat. Several

miles of the unauthorized mountain bike downhill courses within the North St. Vrain drainage are particularly susceptible to soil erosion and not compatible with the goal to improve and maintain water security. In addition, unauthorized trails are impacting other recreational opportunities including hiking, hunting, wildlife viewing, and wildlife photography which is counter to the goal of promoting resilient social and economic conditions. I respectfully request the US Forest Service to control the growth and use of unauthorized trails when developing forest health management actions, especially for those unauthorized trails that lead to or are within the North St. Vrain RNA or Core Habitat. The North St. Vrain RNA is one of the least fragmented habitats within the Boulder Ranger District and Boulder County.

4. Effective wildlife habitat is defined within the Purpose and Need and Proposed Action document and should be incorporated into developing forest health management actions. Actions which open up the forest understory and increase meadows will benefit several wildlife species and increase biodiversity. However, an open forest and larger meadows may accelerate the growth of unauthorized trails. In addition, longer sight lines in open areas may result in wildlife detecting the increased human presence associated with unauthorized trails at greater distances furthering a reduction in habitat effectiveness. On page 44 of the Purpose and Need and Proposed Actions document, unauthorized recreation use is listed as a potential undesirable outcome. I respectfully request a preliminary management action be written to control and manage unauthorized trails within the project area. Controlling unauthorized trails supports the goals of the St. Vrain Forest Health Project and the Forest standard and guideline previously listed.

Thank you for the opportunity to comment on the St. Vrain Forest Health Project.