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United States Forest Service

Re: St. Vrain and Left Hand Water Conservancy District St. Vrain Forest Health Project NEPA 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.

The District commends the U.S Forest Service ("USFS") for the strong collaborative Project proposal developed thus far, and is providing comments below on the Project proposal.

Support

The District does not object to the treatments proposed by the USFS to address the goals of the Project. Specifically, the District supports the USFS's proposed use of tree thinning, slash piling, pile burning, broadcast burning, invasive plant mitigation, sanitation, salvage, and strategic tree planting in the lower montane, shrubland, and shortgrass steppe. The District also fully supports the USFS's strategy to gather data to establish baseline environmental conditions, continuously monitor treatment areas, and inform adaptive management triggers. Specifically, the District supports data collection and monitoring for potential impacts to water resources, including patterns and rates of erosion; changes in stream morphology, water quality, bank stability, channel features, fish habitat, and greenline of adjacent water bodies; and invasive species encroachment.

Areas of Concern

The Project proposal does not address considerations for water districts to manage fuels on USFS lands. The District has both funding and authority to work on non-District lands. Formalizing a partnership, similar to the "Shared Stewardship Agreement" recently achieved with the State of Colorado, could be a mutually beneficial opportunity for the USFS to increase capacity and achieve Project goals within the Project area.

The District also requests the USFS conduct public education and outreach regarding legal use of roads, trails, campfires, and firearms on USFS lands. The District is particularly interested in education around negative impacts to water quality. The District is available to partner with the USFS on education and outreach.

The District is grateful for the opportunity to provide these comments, and looks forward to future opportunities to work with the USFS to implement this Project.

Sincerely,

Sean T. Cronin
Executive Director