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First name: Scott

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Organization: Boulder County Audubon Society

Title: President

Comments: Please see the attached comments from the Boulder County Audubon Society.

April 18, 2023

TO: Kevin McLaughlin, District Ranger, USFS Boulder Ranger District

SUBJECT: Comments on St Vrain Forest Health Project Preliminary Environmental Assessment

Dear District Ranger McLaughlin,

The Board of Directors of Boulder County Audubon Society (BCAS) submits the following comments.

We appreciate the need for forest health work to protect watershed values and wildlife habitat. Appropriately placed, science-based vegetation treatments can reduce the impacts of future wildfires to valuable natural resources, as well as local communities.

BCAS would like to emphasize the importance of the USFS insuring proper application of Design Features during project implementation. Protection of natural resources consistent with the analysis depends on the engagement of resource specialists at all appropriate phases of implementation, as well as during post-project monitoring. Wildlife species and habitat values in this large project area that are important to protect include Rocky Mountain bighorn sheep (lambing areas and winter range); raptor nests (northern goshawk, flammulated owl, golden eagle); threatened, endangered, sensitive and rare plants; wetlands; lakes; ponds; streams; riparian habitat; old growth forests; and the North St Vrain Research Natural Area.

We are concerned about increased recreation access being facilitated by project activities, including temporary roads, fire lines, and increased spacing among trees, with the potential to further reduce effective habitat for wildlife. Given Colorado's increasing population and the ongoing proliferation of unauthorized roads and trails on our public lands, wildlife habitat is already increasingly fragmented. We support the Recreation Design Features that address some aspects of this issue. We would like to see these measures strengthened to include non-motorized recreation, and we request that this aspect of project impacts be addressed in the Implementation Framework.

Thank you for your consideration of these comments.

Sincerely,

BCAS Board of Directors