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Comments: Please see my comments in the attached document.

TO: Kevin McLaughlin, Boulder District Ranger

Following are my comments on the St. Vrain Forest Health Preliminary Environmental Assessment (EA).

#### Design Features and Forest Plan Requirements

The EA, bottom of p. 35 under Implementation Framework: Step 2 states [ldquo]Forest Service resource specialists would review the preliminary management action proposal to validate resource conditions, conduct any necessary field surveys, and confirm appropriate design criteria are applied consistent with those described in the St. Vrain EA and Decision.[rdquo] This statement does not mention Forest Plan requirements not specifically included in the EA and Decision. Will resource specialists verify Forest Plan direction not included in the EA and Decision are applied, or is the intent that all applicable Forest Plan direction is included in the EA and Decision, such as under Design Features? Clarification is needed to insure that all appropriate Forest Plan direction is incorporated during implementation - i.e. included in vegetation management contracts, prescribed burn plans etc.

No timing restrictions for bighorn sheep are included in Design Features, even though lambing areas and important winter range occur in the project area. The reason given is that such measures are included in the Forest Plan; however, timing restrictions are included in Design Features for elk and raptor nesting and these are also in the Forest Plan. The bighorn sheep analysis in the wildlife analysis states that [rdquo]...seasonal restrictions from project design features may be implemented to minimize or eliminate effects.[rdquo] How would this work given that no Design Features for bighorn sheep are included? Also, the wildlife analysis includes GL 103 under Forest Plan Consistency, but not ST 102: 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.

I appreciate the addition of Design Feature Recreation 6. I would like to also see language about preventing post-project recreation access along all project-created routes, under HSWF and/or Recreation Design Features. For example, fire lines created for prescribed burns can become routes for motorized or non motorized recreation. The effects analysis hinges on no creation of new open roads or trails. Regardless of the meaning of [ldquo]open[rdquo] intended in Forest Plan habitat effectiveness language, the impacts to effective wildlife habitat occur based on human use of travel routes on the ground, not on definitions of open routes. Also, I think wildlife should be added to this last sentence of Recreation 6: [ldquo]Consultation with hydrology, soils, botany, and/or

recreation staff prior to implementation is required to determine where mitigations may or may not be needed.[rdquo]

#### Other Wildlife and Habitat Considerations

Thank you for the clarifications re: unauthorized, non-system trails. Anything that can be done during implementation of this project to reduce mileage of non-system roads and trails will help to maintain or increase wildlife habitat effectiveness and interior forests, and protect water-related resources, as well as rare plant communities, old growth, and other valuable natural resources that occur in the area, and particularly within the North St. Vrain Research Natural Area. I strongly encourage the USFS to prioritize these actions throughout the projected 20-year implementation period.

I have difficulty understanding how habitat effectiveness could have increased in several geographic areas from the 1997 Forest Plan to the 2020 remodel, even with increased forest density. Did the remodel consider the extensive networks of unauthorized social trails from private homes to adjacent National Forest land, illegally constructed mountain bike trails, access trails created by rock climbers, and other non-system trails throughout the project area?

Dwarf mistletoe has long been part of Front Range forest ecosystems. I recognize the need to remove or reduce it in localized areas under specific circumstances; however, mistletoe provides food and shelter to birds, mammals, and insects and widespread removal could be detrimental. I would like to see the benefits of removing mistletoe in specific treatment areas weighed against the benefits to wildlife of retaining the mistletoe. This could be incorporated into Step 2 of the Implementation Framework.

One commenter to the Purpose and Need and Proposed Action advocated for goat grazing as a treatment for invasive plants. If this were to occur anywhere in the project area, potential disease transmission could threaten the viability of the St. Vrain bighorn sheep herd and thus would not be worth the risk. The Non-Native Invasive Plant Mitigation Management Card does not list biological control (which includes insects and grazing animals) under Treatment Methods; however the language [rdquo]... including[rdquo] could be interpreted to mean that the list is not all-inclusive. The 2003 ARP Weed Management Plan provides for biological control methods. Given the expected implementation time for this project of 20 years, with numerous personnel changes that will occur, I would like to see stronger language clarifying that domestic goat or sheep grazing will not be used for weed control as part of this project.

Thank you for considering my comments.

Bev Baker