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First name: Bev

Last name: Baker

Organization:

Title:

Comments: Thank you for the opportunity to comment on the St. Vrain Forest Health project. I appreciate the work that has gone into public involvement and preparation of the project documents. In general, I support the stated goals. I offer the following specific comments:

Goals

I think this goal needs clarification and broadening: "Maintain and conserve biodiverse ecosystems that provide diverse site characteristics across the landscape by restoring and developing aggregations of aspen, meadows, and fens." The Todd Gulch quaking fen appears to be just outside the southern project boundary, since the Proposed Action document describes the boundary as north of Gold Hill Road, and the fen is on the south side. Whether or not the fen is considered within the project boundary, I think this goal would be more effective and meaningful for biodiversity if it were broadened to include wetlands, riparian habitat, ponds, lakes, and streams.

Implementation and Monitoring

The St. Vrain Forest Health Partnership appears to be an effective entity to assist the Forest Service with project coordination and oversight. It will be critical to insure thorough, accurate tracking of proper application of the CBM guide, Management Cards, and design features prior to, during, and after treatments are implemented. One example is inclusion of appropriate design features into treatment contracts. Also important is thorough tracking and reporting of monitoring, so that lessons are learned and applied to future treatments. I look forward to additional details about how these tasks will be accomplished in the upcoming NEPA documents.

I have a very serious concern about increased recreation access facilitated by project activities. There is discussion in the Purpose & Need and Proposed Action document about minimizing project impacts to recreation facilities and activities; however I see only one brief mention of the flip side - increased recreation resulting from project activities and the detrimental effects this can have on biodiversity and wildlife habitat, including habitat effectiveness. Unauthorized recreation is included in a list under "Potential undesired outcomes" on p. 42 but I don't see any further discussion or design features to address the issue. Increased recreation access can occur both short- and long-term from project roads, prescribed fire lines, and reduced tree density. It is critical that this issue be recognized and addressed. It will be more efficient, effective, and cost-effective to address it when planning treatments in specific areas, as opposed to attempting to mitigate it after treatments are implemented. This can be facilitated by appropriate placement of treatments, project roads, and prescribed fire lines, plus other measures such as temporary closure to recreation during project activities.

In addition to up-front project design, project monitoring should include monitoring for post-treatment increases in recreation access facilitated by project activities, and appropriate mitigation measures implemented if such increases occur despite best efforts to prevent them.

Related to this recreation access concern, I am aware of ongoing creation of unauthorized trails on the Boulder Ranger District, including in the project area. In the North St Vrain Geographic Area, deliberate construction of mountain bike trails has accelerated recently, resulting in dozens of miles of unauthorized trails including substantial miles in the RNA. The Purpose & Need and Proposed Action documents contains this statement on p. 40: "Furthermore, during implementation areas off of national forest roads that are experiencing resource damage from use may be discovered and restored (similar to decommissioning). Restoration of these areas will have long-term benefits for water-related resources in the Project area." Trails, especially at high density, also cause damage to natural resources including water-related resources. I would like clarification on whether this statement is intended to include non-system trails, and if not, if it could be clarified to include them.

Appendix A: CBM Guide

In the Old Growth Forests section, photos and descriptions of the various old growth types and Forest Plan designations are presented. These categories include some information about desired future condition. However, there are no headings for existing condition, desired future condition, or possible management cards, for clarity and consistency with the other sections.

Appendix C: Design Features

Please refer to the above discussion re: increased recreation access facilitated by project activities. Design features should be added to insure that recreation access does not increase as a result of fuels treatments, particularly in important habitats such as Research Natural Areas (RNA), Core Habitat, and Forested Flora and Fauna. Increased recreation access in such areas is inconsistent with Forest Plan direction and detrimental to biodiversity, including native plants and animals. As discussed above, incorporating measures into project design will be more effective, efficient, and cost-effective than attempting to mitigate effects after implementation. Post-treatment mitigation will probably also be needed in some areas, even with prevention measures.

Design features specific to bighorn sheep, a Management Indicator Species for the ARP, need to be added, particularly for lambing and wintering areas. The following Forest-wide direction applies and should be incorporated into design features for wildlife, along with applicable Management Area Direction for RNA's, Core Habitat, and Forested Flora and Fauna.

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.

Thank you for considering my comments on the St Vrain Forest Health project.