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First name: Betina

Last name: Mattesen

Organization:

Title:

Comments: I don't support the Conditions Based St. Vrain Project because it excludes site specific public involvement. Like Categorical Exclusions or Task Orders it excludes people who know a lot about these lands. We may have information that could make these projects better but there is no opportunity to contribute. Instead, paid Collaborative Groups stand in for us. Their public outreach is laden with pro-project ideology. That's no substitute for authentic public involvement: objective, unbiased opinions that contribute a diversity of perspectives about the management of public lands.

Therefore the Forest Service should scrap the enormous nebulous Conditions Based approach and do an EIS. I'm a NEPA fan - a law that respects that it's our public land - and I want the opportunity to participate in site specific individual EA projects in this area.

I endorse all issues in the letter from Forest Management Analyst Rocky Smith. 7/6/22

Please also address these concerns:

The project will worsen our District's serious problem of Unsustainable (Unmanaged) Motorized Recreation. I helped make the Motor Vehicle Use Map (MVUM) with a former Forest Service Recreation Manager, conservationists and responsible motorized user groups. I expect it to be applied. The current Recreation Manager and the partially funded CO Parks and Wildlife OHV Team are falling down on the job. Many area residents have tried to improve our vast network of illegal mountain biking and motorized trails and after years of effort these have not improved. The signage, education, closures and enforcement are lacking. The roads and trails created by logging and fire lines - and inability to close them - will contribute to fragmentation of habitat and wildlife disturbance as well as degradation to vegetation, water and soil and its fungi.

I'm concerned that when I inquired about the presence of OHV trespass in the rare and fragile Research Natural Area in the project area, the answer, in writing, was "it's likely there are unauthorized routes across the project area where use is occurring, including inside the RNA" and "existing efforts are being made to sign authorized routes shown on the MVUM and documenting unauthorized routes for future management decision". This is improper; those management decisions were already made in the Travel Management Law and MVUM public process. By law, managers are not allowed to manage (or not) based on their opinions.

I'm aware of an advocacy group offering to partner with the ARNF to assist with MVUM education, signage and physical closing of illegal mountain biking and motorized trails to specifically protect wildlife. They were rebuffed and told "it wasn't needed". Boulder's recent grant application to CO Parks and Wildlife proposed moving the OHV Team's efforts from "Good Management" practices (education, signing and closures on which you've barely begun) to "Construction and Maintenance" of OHV Trails to benefit that single user group. The Boulder District ARNF stewardship in "Sustainable Recreation", a national level Forest Service initiative, is way overdue.

There should be no new routes made for any purpose until you close and rehabilitate the many illegal ones that

degrade the ecological integrity and treasured wildlife of our Forest.

Please address the project's impacts to Boulder County and the Forest Plan's species of concern and include interior forest species, birds (especially during nesting), cavity dwellers, pollinators, reptiles and amphibians which are alarmingly in decline. Address how opening forests may affect cooler microhabitats important to them. Address issues of habitat connectivity and fragmentation and loss - a Boulder County, State of CO and Federal mandate.

Please address the Biodiversity Crisis and your role in it. Our Forest Plan directs that you acquire land to consolidate holdings and this is a goal of the federal America the Beautiful 30x30 Plan. How will this project further this important goal?

The project should complement and respect the Boulder Comprehensive Plan's special area designations of Environmental Conservation, Natural Landmarks and Areas, Archaeologically Sensitive, Significant Natural Communities, Habitats and Wetlands etc. which hasn't always been the case. Very High Biodiversity Area Gordon Gulch is a good example. Rough, primitive roads were "improved" for logging resulting in over use - stealth camping and campfires beyond the designated sites and intensive OHV recreation with a web of illegal trails.

Please address carbon storage and climate impact. Studies are showing that the logging and processing of settled, older forests can release more greenhouse gasses than wildfires. I'm concerned that reports on the prescribed New Mexico Calf Canyon-Hermit's Peak Fire state that climate conditions and megadrought were not taken into account. Are you doing that here?

Are you improving fire safety or making it worse? The "unhealthy forest" rhetoric might as well be "the rain follows the plow". Cutting opens the forest to people (who cause the vast majority of fires), illegal OHV use (which can cause fires as is likely in the Lefthand Fire which had a large unmanaged, illegal trail system), heat, drying, ground and fine fuel growth and wind. The blowdown and lop and scatter you do (a good example is just west of the Nederland High School that should be protected) looks exactly like the graphics your partners use to show us what is bad. Older trees resist fire; regenerating trees with thinner bark burn more easily. All of the big fires of the west were intensively managed - it didn't help. The FS followup research on Boulder's Fourmile Canyon Fire reported that cutting projects there didn't help. Fires are climate, wind and heat driven and many scientists tell us that fuel loads and their reduction aren't significant.

Please consider the removal of what you deem excessive dead ground fuels only without high impact cutting in this project.

You may not be allowed to conduct either prescribed burns or get caught up on slash pile burning (last count is 60,000 unburned piles) which degrade the scenic, naturalness of forests, emit carbon and are "attractive nuisances" (I recently saw one used as a windbreak behind a campfire ring!) I'm concerned that when you let them remain long term you may be literally burning wildlife (like native bees and insects) that shelter there. It is common to see how their burning kills live adjacent trees which become the overstocked deadfall that you're

trying to address. Please do create any new slash burn piles until you have caught up on burning the already existing ones on the Districts and learn what direction the Forest Service will be allowed to go with intentional fire.

Taxpayer money spent here could have gone to hardening homes and communities through defensible space measures and replacing wood siding which is far more effective for wildfire protection. Fuelwood reduction and its promises may be creating a false sense of security and actually endanger people and homes.

No clearcutting is acceptable. People hate clear cuts - they destroy scenery and habitat. They invite invasive species, faster melting snow and runoff, soil compaction and carbon release. The huge West Magnolia and Kelly Dahl ones that you've done are growing back into flammable doghair lodgepole which will soon be overcrowded and full of the deadfall, overstocking you are trying to relieve. I believe that the FS is only allowed to do 40 acre clearcuts. The fact that you put 40 and 40 together to make 80 acres plus in these areas is disingenuous at best.

Lop and scatter - often of very large trees - is an offensive waste when it is overused like on Burnt Mountain near Gold Lake. It is impenetrable to hikers who love this beautiful spot (you blocked the best route to the top) and likely some wildlife. How is this not fire prone in the long run? Don't use it.

Please protect rocky knolls and outcroppings. These are scenic, people enjoy them, and the trees, snags and crevices there are important to wildlife. The District has many examples of large trees cut and left on knolls, presumably because the terrain was too difficult to retrieve them. There should be large leave areas around and on knolls to keep them natural.

Protected Old Growth areas are critical to carbon storage, wildlife and people. Do not allow your contractors to cut old, enormous trees as happened at Taylor Mountain in this project area.

You must protect critical ecosystem services and integrity. How will you respect and foster the cooperative relationships between trees which share health and nutrients through systems of roots and fungi?

Please also protect "Cultural Ecosystem Services", the nonmaterial benefits that natural, unspoiled forests, scenery and biodiversity provide to people. Protect all cultural and archeological features.

There is no need to cut in Roadless Areas, riparian areas, spruce/fir ecosystems or the burn area and I look forward to their full protection. Do not salvage log in the burn area. Standing burned trees promote healthy populations of woodpeckers and other insect eating birds which is natural protection for excessive insect outbreaks and disease.

Are there improper signs attempting to landlock (block) or privatize public land - or unpermitted roads, driveways and trails in the project area as on so many areas of the Forest? Please correct them, not ignore them, to serve the public interest.

Will a labor or staff shortage allow you to properly oversee and monitor contractors - or distract you from other

essential management responsibilities as you "care for the land and serve people"? The American public is tired of poor customer service and unanswered questions and requests as we entrust you with this most precious public land resource.

We lack basic environmental education on kiosks etc, like campfire safety, Fire Ban, Travel Management/MVUM Designated Routes Only and Stay the Trail Law, QR Code posting of the MVUM, 14 Day Camping Limit, Don't Pick the Wildflowers, No Tissue Paper Flowers (TP) etc. that most other western Forests use and people benefit from and enjoy. Your paid collaborative groups could assist with implementation instead of trying to get us to like massive logging projects like this.

Thanks.