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Comments: Comments on Wildlife Considerations of the St. Vrain Forest Health Project

1) The project needs to have an enlarged area of awareness of good lynx habitat. In every east-west gulch that I've explored and placed camera traps in, I have seen snowshoe hares on the north-facing side of the gulch down to about 8000'. Those north-facing slopes retain snow all winter and spring, and they harbor dense spruce-fir forests which are the favored habitat of snowshoe hares (Vashon et al., 2012). These gulches and hillsides could provide lower elevation habitat for lynx than the "subalpine" zone cited in the analysis.

The analysis points out that lynx have been documented in Rocky Mountain National Park (RMNP). In terms of lynx travel distances, the project area is not far from RMNP. In fact, part of it abuts RMNP. Lynx have been documented to travel huge distances up to 600 miles and commonly travel 60 miles or more (Poole, 2003). Therefore, if we want to continue the expansion of the lynx population in Colorado, we should consider the project area to be critical for travel. It also could serve as potential home range territory for lynx.

Given that there are lynx in RMNP, I believe that this project should take every possible action to protect lynx habitat and travel paths. In addition to using only manual thinning in the subalpine zone, it should do the same for north-facing slopes of gulches above 8000' elevation. I believe that these spruce-fir forests should either be left untouched or be lightly thinned using manual methods.

2) Small wetlands dot the treatment area. They are extremely heavily used by wildlife. Trail cam analysis shows at least 5 individual black bear, elk, moose, songbirds, and raptors per week use a small fen that I found in the middle of the treatment area.

Before beginning treatment of any section of the forest, an "on the ground" search of an area must be executed to identify these critically important water sources. When they are found, they must be protected for the sake of wildlife and because it's federal law. At least a 100 yard area around the water source must be left untouched. If the forest around one of these wetlands is thinned or clear cut, cautious wildlife will no longer use it due to lack of cover. Moreover, some of the wetlands will dry up due to lack of vegetation shading and holding water in the area.

Please add an "on the ground search" for wetlands project requirement that is done prior to any forest cutting. When wetlands are found, a reasonably large area must be protected around each wetland to protect it and the wildlife who use it.

#### References

Vashon, J., McLellan, S., Crowley, S., Meehan, A., and Laustsen, K. (2012) Canada Lynx Assessment. Maine Department of Inland Fisheries and Wildlife Research and Assessment Section.

Poole, K.G. (2003) A Review of the Canada Lynx, *Lynx canadensis*, in Canada. *Canadian Field-Naturalist* 117(3): 360-376.