

Data Submitted (UTC 11): 9/2/2023 10:24:01 PM

First name: Claire

Last name: Farley

Organization:

Title:

Comments: St. Vrain Forest Health Project, Kevin McLaughlin, District Ranger, Boulder Ranger District and Dennis Kuhnel, District Ranger, Canyon Lakes Ranger District.

1) Based on my original comment on p. 18 of Appendix E that begins with "Small wetlands dot the treatment area."...

How will the public be able to provide input about the location of fens within the treatment area directly to the USFS? Some of us know where fens are that are heavily used by wildlife.

2) Objection based on my original comment on p. 79 of Appendix E that begins with "The project needs to have an enlarged area of awareness of good lynx habitat ..."

As for potential lynx habitat in the many gulches within the project area, these gulches also are climate refugia. Because they provide protection from the warmer climate, they can provide wildlife with places that are cool enough for life. In addition to the issue of thinning disrupting the habitat needed by lynx, thinning of the spruce-fir forests within a gulch will allow more sunlight into the forest and dry the vegetation and soil. After thinning, a gulch that is currently a climate refugia may not be one.

The maps lack detail that would allow me to see exactly which gulches have POD boundaries. That makes it impossible to make fully informed comments and objections. Based on my interpretation of the maps, it appears that at least one east-west rugged gulch just north of Ward is a POD. It is the one that leaves Ward heading eastward and eventually meets Left Hand Canyon Drive. It is slated to be mechanically thinned. Given the steepness of the terrain and the riparian vegetation, mechanical thinning is likely to cause terrible damage. If indeed you insist on thinning within these gulches, you must limit activity to manual thinning.

Manual thinning will have a lesser impact to lynx habitat as evidenced by the following statement: "The propose[d] manual/mechanical treatment area in lodgepole where clearcut/patchcuts are emphasized would remove a small amount of lynx habitat (up to 770 acres removed), while up to 443 acres would be degraded by salvage and mechanical thinning, and up to 797 acres may be impacted to a lesser degree by manual thinning." (emphasis added) P. 109 BA

Alternatively the POD in question could be located along a road that is parallel to the gulch. Appendix E, p. 70 "allows for the flexibility [to] manage POD boundaries when they follow, for example, riparian corridors where impacts to the stream etc. need to be avoided."

In the case of the gulch just north of Ward, the POD could be moved to Left Hand Canyon Drive. That would protect the wilder gulch (I believe it is Spring Gulch) that does not have a road through it.

In the gulch just north of Ward (which I believe is Spring Gulch), a stream runs throughout the spring, summer, and fall months (it's frozen in winter). On p. 6 of Appendix B, "HSWF 2 - Riparian Zones, Stream Channels, and Wetlands: Buffers and Other Design Features" states that there must be a 100' buffer from all streams. I assume that this includes both timber cutting and vehicle travel. Within lower Spring Gulch, there is only a trail and no road. Moreover, it is within 100' of the stream in many places. This trail should not be used for vehicular travel as per your own design features.