Data Submitted (UTC 11): 4/19/2023 5:55:54 AM
First name: Teagen
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Title: President
Comments: Please find our letter attached below.

Kevin McLaughlin

Boulder Ranger District

2140 Yarmouth Ave.

April 18th, 2023

Dear District Ranger McLaughlin,

Please ?nd below the Magnolia Forest Group's comments on the Preliminary EA (PEA) for the St. Vrain Forest Health Project.

While it is encouraging to see a shift in the USFS's focus towards lower montane, southern aspects, strategically placed treatments, and prescribed ?re, we do still hold reservations and concerns about the project activities and treatments. Despite being at the stage of a preliminary EA there is still a substantial lack of site speci?c analysis, which is the corner stone of the NEPA process. Site speci?c analysis and/or community engagement on sub project selection post NEPA do not ful?ll the same requirement as those within the NEPA process.

The St. Vrain "Forest Health" Project is now clearly a fuels mitigation project rather than a restoration project with 70 percent of the treatment area within the WUI Mitigation Zone and POD boundaries. These boundaries, in particular the WUI Mitigation Zone, reach far into the upper montane and subalpine zones where the proposed treatments are ecologically inappropriate and of questionable e?ectiveness in forests that historically burn with mixed to high severity ?re.

The comments below build upon comments submitted by the Magnolia Forest Group in response to the St. Vrain Proposed Action scoping letter in July of 2022.

Clari?cations/Requests/Errors & Omissions
Despite the over 200 pages of documents between the PEA and Appendices (not including the Specialists Reports) there is still a considerable lack of information and detail on the project that is necessary in order to make fully informed comments on the project proposal. This level of detail is an essential part of the NEPA process (see the section below on NEPA for more). Below please ?nd a list of requested information (mostly maps), as well as statements requiring clari?cation.

Appendix A:

I. Provide photos demonstrating all 3 thinning options. For example - our idea of thinning from below may be very di?erent from the USFS's. We can not accurately comment on an action without su?cient detail.

II. The photos for the Mixed Conifer card shows mixed conifer transitioning to ponderosa pine, even though the card describes di?erent desired outcome depending on the elevation and productivity of the site.

III. The photos for lodgepole pine are not from comparable vantage points. The result is comparing apples to oranges.

Appendix C:

I. Please overlay the treatment map with the biophysical zones map so that treatment areas and prescriptions can be accurately compared with the biophysical zones.

Appendix D:

I. Please over lap the POD and WUI Mitigation Zone boundaries map with the cover type map to demonstrate what cover types are being treated where. (Current lack of detail and landmarks on the di?erent maps make it very hard to reference from one to the other - for almost all maps.)

II. Please add a map with color coding for elevation zones (i.e. lower montane, upper montane, subalpine) for use in referencing comments throughout the PEA on treatment type based on elevation.

III. Please add a map showing locations for PC/CC, thinning from below, variable density thinning, and shaded fuel breaks. This material obviously already exists and was drawn upon in the wildlife biologist's report in particular to reference acres of treatment types within lynx territory.

IV. Please add a map showing e?ective habitat and interior forest overlaid with treatment boundaries for reference in understanding how and perhaps more importantly where treatments overlap.

V. Please provide a map, such as Management Action Opportunity Areas, with acreages provided for each polygon in addition to the lump sum (mechanical acres, etc.) Without individualized unit information comments pertaining to size and location can not be accurately made.

Appendix E:

I. The USFS provided no response to our comments supporting the reintroduction of beavers into the project area as an additional means to meet the stated purpose and need of the project (Magnolia Forest Group St. Vrain Scoping Comments p. 34-35)

II. Our comments on herbicide use were not noted (Magnolia Forest Group St. Vrain Scoping Comments p. 38) They should have been noted under: "We are facing a water and biodiversity crisis - herbicide use. (CM-3)", p. 39

III. The USFS provided no response to our comments on Sanitation (Magnolia Forest Group St. Vrain Scoping Comments p. 20-21.

IV. Comment: "Spruce-?r stands experience infrequent ?re and are not depart from historic conditions. (RSetal-10)" p. 33 - response does not line up with the acres listed in the wildlife section of the PEA p. 64-65: "The mechanical treatment uni[t]s also contain an estimated 226 acres of mixed spruce-?r/lodgepole type…" and "Manual Harvest Areas. . .An estimated 557 acres of these acres are in spruce-?r and primary lynx habitat" This equates to 783 acres, not less than 200.

Preliminary EA:

I. There is some basic quantitive data missing from the PEA such as:

A. Number of treatment acres (not project acres) of each cover type (Ponderosa Pine, Douglas ?r, Lodgepole, etc.) Please provide.

B. How many acres of patchcut/clearcut (PP/CC), thinning from below, variable density thinning, shaded fuel breaks - please provide.

C. How many acres in the project area are classi?ed as lower montane, upper montane, and subalpine? Please provide information.

II. Page 27 of the PEA states: "The width of the managed area [POD] will vary from 300 to 500 feet but may extend up to 1,000 total feet in width." However p.24 of the Recreation Specialist's Report states: "The following tables represent National Forest System Trails, Roads, and Recreation Sites that could be impacted by treatment activities within the total 2000-foot corridor analyzed." What is the total correct width of the POD corridor?

III. Throughout the text "lower elevation" is commonly used to describe current or desired future conditions. However no de?nition with an actual elevation is ever provided, which makes all statements it relates to subjective and ambiguous. Please provide a de?nition including the elevation referenced.

IV. Similarly "peak ?re season weather" is used several times through the text with no quantitative de?nition. Please provide one.

V. PEA p.23: "Due to longer ?re return intervals at higher elevations, forests above 9000 feet that may not have missed a ?re cycle are unlikely to have meaningfully departed from historical conditions. . . Below 9000 feet in the montane zone, restoration actions are important to restore forest structure to historical conditions (which have been departed from due to ?re suppression, etc.) and to reduce ?re risk." The elevations listed in this statement are at odds with the de?nition for Upper Montane in the Purpose and Needs Document (8,000-9,000'), as well as other comments throughout the PEA such as on p.56 "Lower elevation forests of the project area are denser than they were historically, while in the upper montane and subalpine zones, vegetation has not departed from historic conditions."

VI. PEA p.54: "Patchcuts/clearcuts in lodgepole pine stands along POD boundaries and around WUI would be primarily implemented mechanically, but sometimes manually, around aspen stands to stimulate expansion of well-established clones or to enhance residual clones within the lodgepole pine matrix that have declined in

the absence of disturbance. The intent in these stands would be to promote aspen suckering, not regenerate lodgepole pine, to better facilitate wild?re suppression." - Does this imply that patchcuts/clearcuts will only be carried out adjacent to aspen stands?
VII. From the maps and written material it is unclear whether or not any POD boundaries overlap wetlands and/or streams. Please provide clari?cation. Given the requirements of POD boundaries for at most shaded fuel breaks it would seem they are highly incompatible with design requirements for wetlands and/or streams.

VIII. How many feet/miles out from buildings does the WUI Mitigation Zone reach on average? Is there a standard distance?

Issues
Staffing

Though the BRD has been making strides to increase sta?ng levels since the time of our scoping comments there is still a shortage of sta? on the BRD needed to carry out a project of this size. The Forsythe ll Project DN approved 2,462 acres for treatment activities, including 945 acres of broadcast burning (p. 31, DN Forsythe ll Project). Those 2, 462 acres were broken up into 4 (non-consecutive) years worth of layout and implementation. On average that equates to about 615 acres per year. Even at only 615 acres (average) per year the time commitment from both the USFS to survey, ?ag and mark, and from the Magnolia Forest Group to ground truth, map, and monitor was huge. The St. Vrain Forest Health Project with 43,250 acres would need to implement approx. 2,160 acres per year to be complete within the 20 year timeline. This is a vast improvement over the 5,000 acres per year needed in the original purpose and needs document. However with the need to ?rst cut and then burn many of the acres proposed that acreage number is much higher since many acres will be treated twice. Those 2,160 acres per year are 3.5 times the current scale of treatment. Logically that would require 3.5 times the 2017-2020 level of sta?ng at the USFS and 3.5 times the involvement from the public or partners. Being very generous, and assuming each person is capable of more, and/or available full time, that would require somewhere around double the number of people actively involved in the Forsythe ll Project. While the BRD is making strides in increasing its sta?, the District is still short sta?ed to take on this scale of project. It will also take time, likely up to a year based on past experience, for new sta? members to become familiar with the District (both via material in the o?ce and more importantly on the ground realities), as well as with project details.

Two positions of particular note that are currently lacking at the BRD are those of the wildlife biologist, who is shared with the Clear Creek Ranger District and may still be covering for a third ranger district in the absence of their wildlife biologist, and an invasive species coordinator, which the BRD does not have at the district level. Given the scale of this project the BRD needs to have these positions ?lled with the resource specialist focused entirely on the BRD (not split between districts).

At current sta?ng levels the most likely way an average of over 2,000 acres per year could be covered (unit design, layout, etc) in the number of years set forth is by working o? maps and aerial imagery with limited ground truthing, and Designation by 4 Prescription (D by P) implementation. Both of these methods carry signi?cant room for error. For example, in one of the Forsythe ll units the apparently dense lodgepole from

10,000' aerial imagery, which was slated for patch cutting, turned out to be lodgepole developmental old growth directly above a drainage. In other words it was a minority on the landscape, and a desirable feature to retain, which if not checked on the ground would have been patchcut. On the 2017 Landscape Restoration Team ?eld trip to the Pike San Isabel Forest one their silviculturalists spoke to the fact that marking individual trees yielded the best results to match what he was looking for in his prescription. D by P implementation on the other hand greatly diminishes the ability to hold the contractor accountable for mistakes unless they are extreme.

Despite desirable increases in current sta?ng the USFS needs to increase its sta?ng levels still further in order to take on a project of this scale, or alternatively scale back the scope of this project.

Silviculture

I. This is a fuels reduction project, not a restoration or forest health project as it has been portrayed to the public up until this point. PEA p.27 states: "Proposed management actions described in this section would be applied in the infrastructure, POD boundary, and WUI mitigation zone focus areas, which combined encompass approximately 70 percent of the national forest lands in the Project area (Table 2)." This means the vast majority of the project is focussed on fuels objectives, which override all ecological considerations, even for lower montane as stated on p.56 of the PEA: "Forest restoration objectives in lower elevation forests are secondary to fuel mitigation objectives along POD boundaries and around WUI."

II. Within the WUI mitigation zone (Appendix A) there are 5 di?erent options for treatment (7 if you include the 3 types of thinning). What are the triggers for implementing treatment (in di?erent cover types)?

III. The USFS is disproportionately incentivized to use mechanical treatment as opposed to manual treatment in order to triple count, rather than double count acreage for reporting purposes. This needs to be openly acknowledged to the public when the USFS is deciding which technique to use for a particular unit.

IV. We strongly oppose the use of cable removal during any part of this project.

Recreation

We appreciate the details provided in the Recreation Specialist's report as far as which and how much of the USFS roads and trails will be e?ected by treatments within the project area. This is some of the only site speci?c analysis in the whole PEA.

I. We strongly urge the USFS to remove all treatments from the Brainard Lake Recreation Area and associated roads and trails. Out of the whole project area this one location has an exceptionally high volume of trails, campsites, and day use areas that are highly prized by locals and visitors alike for the natural environment. To put it mildly no one will appreciate the sort of action the USFS is proposing for the area. The Brainard Lake Recreation Area also boarders Indian Peaks Wilderness

and is essentially the farthest western reach of the proposed POD boundary (in other words the POD boundary essentially dead ends on the west side of the Brainard Lake Recreation Area anyway. Very little can be gained by this small section of an otherwise continuous POD boundary to the east. The e?ectiveness of a POD boundary within this forest type is also highly questionable (see below under Fuels for further discussion). There is also a high quantity of lakes, ponds, and streams in the Brainard Lake Recreation Area, which pose more concentrated hydrological and ?sheries issues in addition to the recreation ones. We recommend beginning the POD boundary at the very westernmost reach just east of the day use/winter parking lot before reaching the summer ticket station.

II. While we fully support the Recreation Design Features, in particular Recreation 5 and 6, they are of questionable e?ectiveness as evidenced by this statement: "Common issues and challenges include but are not limited to . . . motor vehicles o?-road and/or parked in undisturbed areas, soil compaction, randomly placed camp?re rings, creation of unauthorized social trails, entering a closed area, and undesirable trespass through private property with intent to access NFS or other public lands managed in the project area. In particular, fuels treatment burn piles and areas that have not been reforested after fuels treatment adjacent to roads and trails become an attractive nuisance that further exacerbate these issues and perpetuate issues associated with o? road impacts, target shooting, camping, ?res etc." Recreation Report p.5. Recreationists, especially OHV users, have been known to haul boulders out of the way using chains in order to access areas on the BRD. This problem may be exaggerated on USFS Roads, and other smaller access roads compared to main transportation routes, such as highways. Di?erent approaches should be considered in di?erent use settings; something such as natural barriers may be e?ective in one location, but not another. Preventing new, unauthorized access following project implementation must be a priority for the District!

III. Though unauthorized trails and other activities may not be a managed recreational asset on the District they must be taken into account when considering the likely impact of the proposed project on the landscape since these activities demonstrate behavior common to the area in question. "Many enjoy recreational opportunities on unauthorized trails, undeveloped dispersed campsites; and in concentrated use areas; including but not limited to, undeveloped (dispersed) campsites and concentrated shooting areas, and other allowed activities not speci?cally analyzed in detail. These activities may have social and/or biophysical impacts (soils, water, wildlife, etc.), but they are not actively managed infrastructure, nor considered a recreation resource with management guidance from Forest Service Handbooks and Manuals. Therefore, e?ects from unauthorized trails, dispersed camping, or target shooting are not analyzed in detail in this recreation resource report." Recreation Report p.7 This is not a valid reason to exclude these activities from consideration! They clearly increase the cumulative recreational impact in the project area whether desired or not and must be accounted for when evaluating the likely outcomes of project activity.

IV. Temporary Roads are mentioned frequently throughout the PEA. The PEA states that they will be decommissioned at the end of project activities. However the entire project is slated for 20 years with some areas expected to receive multiple entry treatments (for example manual treatment followed by prescribed ?re). A road that

may potentially be on the landscape for 20 years is not temporary. The "temporary" part of temporary roads needs to be de?ned with a time limit in the EA.

V. We fully support the road maintenance and closures outlined in the EA. However again have concerns about the e?ectiveness of the USFS's road closures.

Wildlife

I. Lynx Habitat:

The project needs to have an enlarged area of awareness of good lynx habitat. Snowshoe hares have been observed in many of the east-west gulches 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-?r 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 project 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, we 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, the USFS should do the same for north-facing slopes of gulches above 8000' elevation regardless of designation as POD boundary, or WUI mitigation zone. These spruce-?r forests should either be left untouched or be only lightly thinned using manual methods.

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.

II. Wetlands:

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 was found by a resident 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 according to 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 design requirement that is done prior to any contract, marking, and/or cutting. When wetlands are found, a reasonably large area must be protected around each wetland to protect it and the wildlife who use it.

III. Beavers:

As in our St. Vrain Scoping Comments (p.34-35) we continue to recommend that the USFS address the presence (or lack there of) of Beavers within the project area, and evaluate the bene?ts of additional beaver locations with respect to improving forest resilience, watershed health, and biodiversity, as well as mitigate wild?re risk and the e?ects of climate change.

Colorado Parks & Wildlife Bene?ts of Beavers:

From an ecological perspective, beavers are good for watersheds. Beavers cutting aspen, willow and other trees will cause the trees to regenerate. Their dams expand the ?oodplain into a drainage which allows them to safely reach food further from the original stream channel. This slowing and expanding of water in the drainage, in turn increases riparian plants, which previously could only grow directly along the stream since the uplands were too dry. The Riparian is one of the more diverse habitat types in Colorado; beavers can help improve and expand it.

Reference:

Fairfax, E. and Whittle, A. (2020), Smokey the Beaver: beaver-dammed riparian corridors stay green during wild?re throughout the western USA. Ecol Appl. Accepted Author Manuscript. doi:10.1002/eap.2225

IV. Loggerheaded Shrike was removed from consideration in analysis due to no known occurrences or habitat present. A Loggerheaded Shrike was seen not too far south of the project boundary o? of Magnolia Road on January 29th, 2023. Photos are located at the bottom of the document.

Invasive Plants:

We appreciate your intention of always minimizing the use of chemicals when developing an invasive plant management plan, as pesticides destroy soil microbiome health. In the context of the climate crisis, we need to protect the soil microbiome to retain water, sequester carbon, and support biodiversity and native plants. For more information on this topic you can refer to the documents referenced below.

Removing seed heads and/or fruiting bodies from invasive plants before they go seed is indeed

a very e?ective practice to reduce the invasive plant seed bank over a small area.

On larger areas, su?ciently removed from the Research Natural Area to prevent any concerns of disease transmission, targeted goat grazing is an approach that has been successfully implemented elsewhere in Colorado. Goat Green LLC o?ers an inspirational example of successful pesticide-free weed management and ?re mitigation. You can watch the inspiring presentation "Using Goats for Habitat Restoration on Public lands" by Hilary Boyd, a wildlife biologist at the BLM Colorado River Valley Field O?ce. The Roaring Fork Transportation Authority also uses the goats from Goat Green LLC along the Rio Grande Trail to manage weeds. The video presents their e?orts and goals. To address the disease transmission from goats to bighorn sheep, Hillary Boyd, the wildlife biologist of the BLM Colorado River Valley Field O?ce, and Colorado Parks and Wildlife agreed that the herder will stay with the goats. The goats do not roam freely, but are lead by the herders and directed by electric fences to weed infested areas to avoid damaging the native vegetation. Additionally, goats are browsers. They prefer to eat brush and weeds rather than grass. Follow up treatments are obviously critical to consistently reducing the weed seed banks. Over time targeted goat grazing can remove weeds and also return the land to a healthy and natural ecosystem, a requirement for carbon sequestration in the soil. Barely any seeds survive the digestive system of goats. This is demonstrated in the research paper "Recovery and viability of seeds ingested. by goats".

In our highly ?re adopted ecosystem, prescribed burns can reduce cheatgrass infestation and favor native plant recovery, as shown in the presentation "Fire, Cheatgrass, Mammals, Birds, and Butter?ies - A Study of Ecosystem Interaction" during the Boulder County Parks & Open Space Advisory Committee meeting of December 16, 2021. These results are con?rmed by the research papers referenced below.

Please don't use toxic chemicals to control weeds when we have approaches that can address the weed problem and also restore the health of our ecosystem, including the soil microbiome. In the context of the climate crisis, we urgently need healthy soil to absorb water and carbon.

Documents regarding the impact of herbicides on the ecosystem and the soil microbiome:

Adverse impacts of Roundup on soil bacteria, soil chemistry and mycorrhizal fungi during restoration of a Colorado grassland

Weed killer use destroys Soil Life and Ecosystem, paper ?nds

Indazi?m controls nonnative Alyssum spp. but negatively a?ects native forbs in sagebrush steppe conducted in Yellowstone area

Research papers regarding cheatgrass control and ?re:

Seeding native species increases resistance to annual grass invasion following prescribed burning of semiarid woodlands demonstrates an increased resistance to cheatgrass invasion after ?re on higher elevation plots

Spatial Variation in Post?re Cheatgrass: Dinosaur National Monument, USA identi?ed increased altitude, increased ?re severity, and increased post-?re soil moisture as factors decreasing cheatgrass return after ?re

Prescribed Burning in the Northern Great Plains: Yield and Cover Responses of 3 For- age

Species in the Mixed Grass Prairie

consistently observed decreases in cheatgrass density regardless of burn timing

Fire Rehabilitation Using Native and Introduced Species: A Landscape Trial and Long-Term Vegetation Recovery and Invasive Annual Suppression in Native and Introduced Post?re Seeding Treatments show that reseeding of native vegetation after ?re can e?ectively control invasive species, including cheatgrass

Fuel

I. Spruce/Fir POD treatment: Spruce/Fir forests historically burn with high severity: "Above 9,000 feet in the subalpine zone, lodgepole pine, Engelmann spruce, and subalpine ?r forests burned very infrequently (>200 years between ?res) but at stand replacing severity across large areas (Sibold and Veblen 2006)." PEA p.6 There is no reason to assume that spruce/?r forests are likely to burn any less intensely in the future. As such it seems highly questionable to consider placing a POD boundary within spruce/?r. If the rest of the forest is burning at high intensity it is unlikely to be a safe location to place ?re?ghters. Even if they were present the odds of holding a boundary during a high intensity ?re seem exceptionally slim. We recommend removing all POD boundaries within spruce/?r dominated forests, and focusing on POD boundaries within forest types with the odds of the POD being e?ective are much better. If the USFS continues to insist in placing PODs in spruce/?r dominated forests please provide evidence supporting their e?ectiveness in such forest types.

II. WUI Mitigation Zone: "The proposed treatments would have a bene?cial, minor/moderate, long-term impact on reducing the average number of buildings a?ected by ?re starts within the WUI Mitigation Zone during weather conditions similar to the Calwood Fire. Compared to the no action alternative, approximately 16 fewer buildings (62%) are expected to be impacted during the ?rst ten hours after a ?re start within the WUI Mitigation Zone." PEA p. 45 The whole WUI Mitigation Zone consists of 24,781 acres (Table 4 PEA p.28) So we are to understand that the USFS is planning to treat nearly 25,000 acres in order to save approximately 16 buildings during a Calwood type wild?re? To say the least this is excessive! The WUI Mitigation Zone needs to be scaled back substantially, and instead of 25,000 acres to protect 16 buildings, which may or may not even be hoes, the USFS should work with these property owners to create defensible space up to 300' onto USFS property as needed.

III. Treatment e?ectiveness: We endorse and incorporate by reference comments made by Alex Markevich on 4/17/23 with regard to treatment e?ectiveness. Furthermore we would like to reference a 2020 study of the Carlton Complex Fire that "found that a range of fuel treatments, including Thin and ThinUB, e?ectively reduced ?re severity relative to untreated pixels during milder ?re weather days. Wind-driven ?re weather put all treatments to the test and suggest that ThinUB treatments were most e?ective at mitigating ?re severity during these events. Wildland ?re burns as a contagious process, and ?re weather, associated with antecedent drought, high temperatures, low relative humidity and strong winds driving ?re spread reduces thresholds to burning. Our results suggest that thinning on its own can mitigate ?re severity but is much less e?ective during extreme ?re weather.

Higher ?re severity and reduced treatment e?ectiveness in the north study area provides strong evidence of this and the importance of recent fuel reduction treatments that involved

prescribed burning." https://www.fs.usda.gov/research/treesearch/60530 The graphs below demonstrate their ?ndings.

Figure S5. Horizontal box plots of the percentage of treatment units by burn severity classi?cation (unburned, low, moderate and high) for (a - top) early progression dates ranging from 7/15 to 7/18 and (b - bottom) later progression dates ranging from 7/19 to 8/10. Treatments include: thin only (thin), thin followed by pile burning (ThinPB), and thin followed by prescribed underburn (ThinUB), prescribed underburn only (UB) and past wild?re (WF).

These ?ndings draw into question the effectiveness of PODs boundaries on days of extreme ?re weather given that they are essentially all designated as thin only treatments.

IV. While we support the general concept of prescribed burning and management of unplanned ignitions due to the clear bene?ts provided we feel that there is still much to learn as far as consistent and safe application. We do not support fall burn windows due to the high chance of strong winds, which stir up even several day old embers to create a wild?re (one example being Fourmile Canyon Fire). Very close attention needs to be paid not just to daily weather conditions, but also seasonal weather conditions, such as the El Niño, La Niña weather cycles, which play a role in fuel moisture content.

V. Decreasing surface fuel is an essential part of any treatment intended to reduce ?re severity. However Mechanical treatments are at odds with these important goals as any unit treated mechanically requires a substantial amount of surface fuel to decommission temporary roads, skid trails and landings to prevent further use by recreationists as well as maintain ground cover. For this reason we strongly recommend manual treatment along POD boundaries and in the WUI mitigation zone.

NEPA Process

I. Cumulative Impacts: There is no way the USFS can accurately evaluate the cumulative impacts of other project(s) or event(s) in the project area up to 20 years in the future. Of speci?c note is the absence of any analysis of the cumulative impact to any and all resources (wildlife, soils, recreation, etc) of other fuel or restoration projects to be carried out on private or County property by partners within the St. Vrain Project footprint. Also absent, particularly in the wildlife assessment, is a cumulative impact analysis of other projects on the ARP, despite determination of e?ects along the lines of: "may impact individuals, but is not likely to result in a loss of viability within the planning area (ARNF), nor cause a trend towards federal listing." PEA p.66. There will be future projects that the USFS has no idea about at this time, but which will occur within the lifetime of this project. Without a full evaluation of cumulative impacts the USFS can not determine a FONSI. "Any perceived gains of omitting site-speci?c analysis now and rushing through ill reviewed projects are dwarfed by the potentially damaging cumulative impacts of implementing those decisions." Request to CEQ p.8 (See Magnolia Forest Group Scoping Comments.)

II. The e?ects analysis compares the e?ects (in all resources) of the proposed treatments with that of catastrophic wild?re under the No Action Alternative. This is not a valid comparison. The St. Vrain Proposed Action p.1 states: "We know humans cannot stop a ?re in raging 100 mph winds or a ?re that moves 20 miles in an hour and crosses the Continental Divide. There is no forest management project that will "protect" our communities from wild?re in

those conditions. . ." This clearly implies that all forest treatments fail under these conditions. This means that even if all project treatments are fully implemented as described in the PEA they will not prevent, or withstand such a high severity ?re. In that case, action or no action, the outcome is the same. This means all of the resource analysis must compare the proposed action with a no action alternative that does not include catastrophic wild?re, but one on which the proposed actions would have an e?ect, likely a wild?re of moderate intensity. (Also see discussion under Fuels as far as treatment e?ectiveness).

III. The PEA does not properly evaluate alternatives within the proposed action such as di?erent possible ratios of mechanical vs. manual treatments; thinning from below vs. variable thinning; thinning vs. PC/CC. Di?erences in the quantity of acres of any one of these treatment comparisons has di?erent impacts to di?erent resources.

IV. While the outline for public engagement during the implementation process PEA p.34-38, is very desirable, and should be kept as part of the project it does not substitute for public feedback during the NEPA process as it o?ers no legal recourse, unlike the NEPA process, should the public feel that the USFS is not adequately addressing their concerns. To this end the USFS must provide site speci?c details during the NEPA process. For example "The Forest Service also attempted to use an ad hoc, post-decisional, implementation phase public participation process that contained no formal, binding requirements on the agency, unlike the speci?c NEPA provisions for public participation. The Forest Service proposed post decisional, twice yearly "workshops" at which the public and Forest Service personnel would suggest "activities" to implement under the Project. The Forest Service's plan, in other words, was that the public, even though deprived of meaningful site-speci?c information, would nevertheless be able to present:

a wide array of activities for all resource areas . . . at these workshops, and that

those present will help to determine locations, activity design components,

methods, mitigation measures, and integration opportunities . . . . We will be

requesting written substantive comments on changes to the activities listed, the

locations, activity design components, methods, mitigation measures and

integration opportunities . . . . The comment period will be 30 days. [The Forest

Supervisor] will consider all comments received during workshops and comment

periods to ?nalize activities for implementation that adhere to the FEIS, ROD,

and Forest Plan.

This public participation framework was entirely subjective and nonbinding because the Forest Supervisor would have the ?nal decision regarding which activities to implement with no accountability during the life of the project. Moreover, the Forest Service and the Forest

Supervisor were not actually bound to follow this voluntary process. Nor would the public be able to hold the agency accountable for failing to respond to public comments or ignoring

contrary data or scienti?c studies, as would be required under NEPA. Post-decisional participation schemes like this do not comport with the public procedural rights created by

NEPA . . . the U.S. District Court for the District of Alaska ruled that the

lack of site-speci?c analysis violated NEPA." Request to CEQ p.10-11

This sounds remarkably like the Implementation Process that the USFS is proposing under the St. Vrain Forest Health Project.

It is clear the USFS is currently not in compliance with the NEPA requirement to provide site speci?c information: "Proposed management actions described in this section would be applied in the infrastructure, POD boundary, and WUI mitigation zone focus areas, which combined encompass approximately 70 percent of the national forest lands in the Project area (Table 2). Appendix D, Map 9 shows estimated infrastructure and strategic fuel area locations. Ultimately, field review of actual conditions on the ground would determine the speci?c areas for management actions." PEA p.27 This means that the USFS has only a rough idea of on the ground conditions for 70% of the project area!

Conclusion
Thank you for your consideration of our comments. We look forward to more site speci?c information to meet NEPA requirements and help inform all public comment on this project.

Sincerely,
Magnolia Forest Group