

RESPONSE TO COMMENTS
 RECEIVED ON THE COMBINED
 SCOPING AND 30 DAY COMMENT PERIOD
 FOR THE
 DRY CREEK/SPRING CREEK VEGETATION TREATMENT PROPOSALS

Copies of letters of comment are attached to this document. Substantive comments were highlighted and numbered, and are responded to below.

Selected comments are carried forward in the EA as issues to be addressed. See Chapter 1 of the EA.

COMMENTOR	COMMENT NUMBER	COMMENT AND RESPONSE
Reg Cridler	1-1	<p>Comment:...suggestion is that non-stocked and under-stocked sites be planted to Aspen which over time might serve as a cover crop for return of Spruce Fir</p> <p>Response: The Spruce/Fir and Aspen treatments are no longer being analyzed in this EA due to scheduling constraints related to T and E consultation for the lynx. The Spruce/Fir and Aspen treatments will be analyzed in a future EA when time constraints are not limiting and consultation can be done effectively.</p>
	1-2	<p>Comment: Brouse (sic) conditions have changed since the high deer numbers of the 60's. The Elk population has grow from 100's to 10,000+. I feel there is a carrying capacity and species competition problem.</p> <p>Response: Existing habitat conditions are recognized as one of the biggest contributing factors to the current mule deer decline. This issue is and integral part of the Purpose and Need for this proposal and a primary emphasis in the Proposed Action. Other factors such as disease, predation, and competition for forage are less of an issue and beyond the scope of this decision.</p>
	1-3	<p>Comment:...I feel chainings could still be a useful tool.....</p> <p>Response: Chaining was considered initally but was eliminated because other mechanical means produce a better result and have less impact on the site in terms of soils and water, and fire hazard.</p>
	1-4	<p>Comment: Noxious weeds can be controlled by the use of herbicides, resulting in successful grass and forb establishment</p> <p>Response: : We agree. The Forest Service uses herbicide on an annual basis to control noxious weeds of all kinds in the project area. Ours is an integrated approach, which</p>

		<p>combines the efforts of Montrose County, Forest Service personnel and grazing permittees. Use of herbicides to control the spread of noxious weeds is a key component of Forest Service weed control efforts. Since herbicides are currently used in the management of the vegetation on the National Forest This issue is dismissed from further consideration.: The evaluation of the area before treatment will give idea of what kinds of noxious weeds are present and what pre-treatment or follow up will be needed. This will be evaluated for which type of treatment is needed. Post monitoring will also give input to what follow up is needed.</p>
	1-5	<p>Comment: Due to current insect activities (Ips and Mountain Pine Beetle) all slash from thinnings and pruning should be burned or removed immediately Response: Response: The Ips beetle currently infesting pinyon pine trees on the Uncompahgre Plateau is a host-specific beetle and is not known to infest ponderosa pine. The mountain pine beetle does attack ponderosa pine trees, but only larger diameter live standing trees, particularly those greater than 12 inches in diameter. However, the commenter raises a good point: because of the unusual physiological stresses induced by the ongoing drought, the possibility exists that heretofore unobserved situations, perhaps including behavioral changes or geographic population shifts of insects, could occur. The Ouray district silviculturist will monitor areas commercially thinned under this analysis to assess the existence of unusual beetle activity.</p>
	1-6	<p>Comment: In Unit 16, and 17, Heavy livestock Use may result in Burn Failure. These units could be accessed by a Roto-Chop or Hydro-Ax from Units 18, 19 and 20. I suggest mechanical treatment in any unit where grazing could result in poor fire effectiveness. Response: The units that will receive Rx treatments will be done in coordination with rest rotation of the area to provide better results of burning. Also some units may and will be treated using hydroax or roller chopping as first entry and evaluate during monitoring if a follow up Rx treatment is needed.</p>
	1-7	<p>Comment: It appears that in spite of the Uncompahgre Travel Plan, many roads and ways are to be decommissioned. This is simply unacceptable. Response: It is apparent from this and other comments that our scoping notice was not clear in this matter. No</p>

		route identified for motorized use in the Uncompahgre Travel Plan is proposed for decommissioning in this project. No adjustment to the Decision made in the Uncompahgre Travel Plan is proposed. This proposal does nothing more than implement on the ground the decisions already made in the Uncompahgre Travel Plan. Decommissioning of specific routes requires examination site specifically under NEPA. This analysis complies with that requirement.
Robert Morris	2-1	Comment: The fourth alternative should have a time limit applied to read as follows. “Proposed action limited... existing trails and ATV routes for the duration of the project.” Response: Please see response to comment 3-1.
	2-2	Comment: Road Closing” The USFS already went through and extensive Travel Plan. Roads we decommissioned and closed at that time. I see this as a back door approach to decommissioning and closing more roads without having to go through the legal approach. I am opposed to decommissioning and closing an more roads. Response: Please see response to comment 1-7
Pennie Love for Uncompahgre Valley Trail Riders	3-1	Comment: My concern is the wording “no construct of new access either through new temporary roads, or improvement/widening of existing trails and ATV route. This would pose a problem to improve or move an existing trail for maintenance purposes on our ATV trails. Response: This provision is intended to apply to this project only, and does not constitute long term policy or direction applying to over all management in the future. We are sorry for the confusion.
Roy Johnson	4-1	Comment: The fourth of the alternatives on page six.... Please consider adding the phrase: “during these Dry Creek/Spring Creek Vegetation Treatment Projects only”. Response: Please see comment 3-1 and response.
John Martin	5-1	Comment: Considering altering any part of the Travel Plan on the Uncompahgre National Forest by including the decommissioning of roads and placing possible moratorium on trail development and maintenance as part to the alternative set is inappropriate..... Response: Please see response to comments 1-7 and 3-1.
Bill Harris for Colorado Plateau Mountain-Bike Trail Association	6-1	Comment: There are a number of trails used by (mountain) bikers that could be adversely affected by the proposed treatments. We recommend that the trails be avoided... or that trail mitigation be part of the project budget. (Maps provided)

		<p>Buck Trail/South Buck (149) two areas Tabeguache Trail Spring Creek Trail Sims Mesa</p> <p>Response: Trails identified for mountain bike use, as well as other routes identified in the Uncomapgre Travel Plan will be restored to designated uses following treatments proposed. Also routes will be avoided during certain treatments so that the trails and routes will not be damaged or use affected.</p>
Jeremy Puckett for Western Slope Environmental Resource Council	7-1	<p>Comment: Are there species that favor mid-seral conditions on the Uncompahgre Plateau which will be impacted by actions intended to improve mule deer winter range. What is impact to population viability of identified species?</p> <p>Response: The ecologists and biologists with both the USFS and BLM are not aware of any obligate or indicator species that favors mid-seral conditions to the extent that their populations would be compromised by the level of treatment proposed. Most of the species utilize a variety of seral stages throughout the course of a season to meet their foraging and cover needs. In addition, the desired vegetation mosaics identified in the Vegetation Management Strategy require that a variety of seral stages for each vegetation type remains, ensuring that, overall, an optimum (optimum for a variety of species as well as for ecological processes) combination of seral stages is available across the landscape. Also the total acreage of treatments will not modify more than 15-20% of the subject watershed area and the treatments specifically to improve mule deer winter range will modify significantly less than that.</p>
	7-2	<p>Comment: In what ways is grazing management being changed on the Uncompahgre Plateau?</p> <p>Response: Please see response to comment 10-1.</p>
	7-3	<p>Comment: With respect to power line right-of-ways, what consideration is being given to micro-climate change within adjacent vegetation due to opening up the canopy, staggering structural conditions etc. There is concern that drier conditions resulting from thinning activity may exacerbate fire risk within adjacent forests.</p> <p>Response: The power line right-of-way treatments have been removed from this EA due to scheduling constraints related to T and E consultation for the lynx, however, the issue of micro-climate may still be pertinent to other treatments. Within the treatment areas themselves there</p>

		<p>may be micro-climate changes as a result of the treatment, the degree of which is a function of size of treatment, intensity of thinning, solar radiation, wind exposure, changes in competition for resources (particularly water), and species re-occupying the site. The objective of many of the treatments is to increase the amount of grass/forb and young shrubs in the area while decreasing the amount of older woody vegetation (pinyon-juniper and decadent shrubs). This change in vegetation should increase the available moisture on these sites and maintain it longer on site in the form of both growing and mature grasses and forbs. Prior to curing out these early seral species often hold significantly more moisture than the litter and debris found beneath older woody vegetation, subsequently the fire behavior is reduced longer into the fire season. In addition, grass/forb/young shrubs burn with significantly less intensity than standing pinyon/juniper and decadent shrubs. Within stands adjacent to treatments the microclimate change may also occur in a narrow band adjacent to the treatment and will also be a function of the previously mentioned items. The distance into the adjacent stands where changes in microclimate might be detectable is probably between 50 and 100 feet. Although the drying/warming phenomena may occur within this band the overall extent of the changes and the contribution of these changes to fire behavior is negligible in relation to the adjacent treated and untreated areas. Overall the changes to fire behavior from treatments, when considered across the entire landscape, will be beneficial, both from an intensity (impact) and control (suppression) standpoint.</p>
	7-4	<p>Comment: What constitutes poor growth form in Gambel Oak vegetation type (see disc. Units 18,19,20 page 11) Response: Unusually dense stands of oak brush.</p>
	7-5	<p>Comment: How many thousand board feet of timber are proposed for harvest in Units 22 and 25 (see pg 11)? Response: This information will be made part of the EA.</p>
	7-6	<p>Comment: What is considered to be a “small amount” of wood products, as it pertains to the proposed harvest in Unit 33 (see pg 12)? Response: See response to comment 7-5.</p>
	7-7	<p>Comment: Dead timber, whether standing or downed, provides important habitat for cavity nesting birds,and other species..... what is the rationale for removing all such material in relation to power line right-of-way protection, and is it necessary to achieve the desired protections?</p>

		<p>Response: Treatments of the power line right-of way are not included in this EA. However, snags, down logs, and other individual trees are recognized as important structural habitat features for wildlife and project implementation will retain them as described in the Mitigation Measures Common to All Alternatives.</p>
	7-8	<p>Comment: Some roads necessary for implementing the proposed projects are not identified for closure or decommissioning. Are the retained routes consistent with the ... Unompahgre Travel Plan?</p> <p>Response: All travel routes within treatment areas will be returned to the use levels designated in the Uncompahgre Travel Plan following treatment. See responses to comments 1-7 and 3-</p>
	7-9	<p>Comment: To date the Forest Service has not placed enough emphasis upon collecting and maintaining population and trend data with regard to species of interest other than elk, mule deer, and other game species. If there are opportunities to obtain information on the population and distribution of any Management Indicator Species, we believe it is incumbent upon the GMUG to collect and maintain such data.</p> <p>Response: From the Forest-wide list of 17 MIS, 4 were selected for project analysis based on their occurrence within the project area, relationship to habitats affected within the project area, and ability to monitor population trend. Included are mule deer, elk, black bear, and Abert's squirrel. All of these are considered game species by the CDOW. We will utilize any available Agency and Natural Heritage data to monitor responses to management activities to the best of our ability.</p>
	7-10	<p>Comment: What if any consideration is being given to mounting evidence that climate change is occurring and how is this information being incorporated into the design of these projects.....?</p> <p>Response: This is beyond the scope of this level of project analysis.</p>
Walt Rule for WCC and ROCC	10-1	<p>Comment: There should be no grazing or significantly reduce use until the range is in satisfactory condition and improving- not just maintaining it(sic) current condition.</p> <p>Response: The EA addresses the effect that treatments may have on grass and forage. The EA also addresses the cumulative effect that grazing along with wildlife use is having. Mitigation measures to reducing localized use in treated areas, to allow for establishment of desired vegetation, may be developed and implemented.</p>

		<p>However, decisions regarding the overall allocation of use, or the stocking of grazing is outside the scope of this process, and has already been decided under the Horsefly Rangeland Environmental Assessment. Data supporting the Horsefly assessment indicates that rangeland conditions within the project area are improving. Improvement in conditions of rangelands is expected to continue as the decision resulting from the Horsefly Grazing EA is implemented over time.</p>
	10-2	<p>Comment: There is no mention of the Ips beetle outbreak in the PJ. Response: This will be addressed in the EA.</p>
	10-3	<p>Comment: Page 11- Units 22 and 25 contain “XX symbols for the board foot estimates... ? Response: This information will be included in the EA.</p>
Walt Blackburn for Thunder Mountain Wheelers	12-1 & 12-2	<p>Comment: You have indicated considerable “Decommissioning”(sic) of roads and trails. We find such a proposal, “unacceptable”.It is our position that the identified roads and trails in the Travel Plan should be stable without addendums, deletions, modifications or any other unnecessary action. Response: All proposed decommissioning is consistent with and merely implements decisions made in the Uncompahgre Travel Plan. See response to comments 1-7 and 3-1. \</p>
Tom Wiard	13-1	<p>Comment: I am a mountain biker and worried about the Spring Creek vegetation projects affect on the existing trails : Buck and Spring Creek trails. Response: Please see response to comment 6-1</p>
Phil Miller	14-1	<p>Comment: A lot of the problems of invasive weeds, lack of vegetation diversity, and actual lack of vegetation has been due to combined overgrazing by livestock and winter use by big game. I believe that it is useless to undertake expensive projects intended to improve vegetation conditions then permit continued livestock grazing after the treatments. Response: Current inventories indicate there are about 94 acres infested with 1 of 5 species of noxious weeds within the Dry Creek and Spring Creek watersheds. Approximately 55 acres infested with noxious weed are located in the planning area. At the moment these populations are confined and the rate of spread is minimal because of management practices that have already been put in place by the Horsefly project. Species diversity is rich with some sites containing more than 35 species of plants. Even the worst sites, which are very small include</p>

		as many as 15 different species of plants. Overgrazing is not permitted under the terms of the Horsefly project. Please see response to comment 10-1 and 15-6.
	14-2	Comment: One of the principle objectives of the projects is the improve big game winter range. The summer growing season should give plants the opportunity to restore themselves with out being hammered by cattle..... I do not believe that semi-arid lands such as on the project areas were ever suitable for heavy and concentrated impacts of livestock grazing. Response: A decision made as a result of the Horsefly project has already concluded that livestock grazing will continue on the project area. Likewise the URI resulted in a similar decision. See response to comment 10-1 and 15-6.
Mark Schofield for Western Colorado Congress	15-1	Comment: To what extent does the “collaborative community involvement effort and an interagency interdisciplinary planning approach” mentioned in the ”Background” section refer to the Uncompahgre Plateau Project? Response: The Uncompahgre Project is the primary vehicle for this collaboration.
	15-2	Comment: Does the Forest Service have complete citations for the abbreviated references used in the text discussion the need for treatments? Response: :Yes. These will be in the “Literature Cited” section of the EA.
	15-3	Comment: While fuels reduction near power lines is important and necessary, the proposed width seems like it might be excessive. Response: This issue will be addressed in a separate EA.
	15-4 & 15-5	Comment: Where, when and how will monitoring of these projects occur to ensure that they are meeting their stated objectives? It is crucial that the first project of a set be monitored and analyzed before succeeding projects ... are undertaken. Response: We agree that monitoring will be important. Monitoring will be recommended in the EA. Required monitoring will be identified in the Decision Notice.
	15-6	Comment: How will the Forest Service prevent overgrazing by livestock in areas that have been treated to improve vegetation conditions? Response: Implementation of the guidelines in the Horsefly EA will lead will to improvements in rangeland conditions throughout an area, which covers some 119,000 acres. The planning area for this project is a small part of

		the Horsefly grazing landscape. Treatments proposed are designed to impact the canopy cover of woody vegetation, whereas, the impact on grasses and forbs are expected to be minimal. Over grazing is not permitted under the terms of the Horsefly project or the Uncompahgre Rangeland Initiative project. Please see response to comment 10-1.
	15-7	Comment: What will the Forest Service do to address the impacts of livestock grazing on semi-arid lands such as those where the projects are proposed? Response: Please see response to comment 10-1
	15-8	Comment: Establishing enclosures that exclude livestock but don't prevent use by big game could also reveal important information. Response: This is a good idea for monitoring and can be coupled with Range Allotment planning and management.
William Sutton	16-1	Comment: this alternative gives the impression of being a "sneaky" way to close or "decommission" many existing routes under the guise of vegetation/fuels treatment. That is simply unacceptable. Response: Please see response to comments 1-7, 3-1, and 12-1.
Ray Miles	17-1	Comment: concern is in the Alternatives that you list. ... where you state that there would be no expansion of ATV trails or Roads. I understand this was to mean only during the tree removal but the statement doesn't state this. Some people might think this as a new policy..... Response: Please see response to comment 3-1.