



File Code: 1950-3-1

Date: February 24, 2009

Greetings:

You are receiving this letter because I would like your comments on proposed vegetation management treatments in the **Uncompahgre Mesas Forest Restoration and Demonstration Project** on the Ouray Ranger District of the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG). This letter and attached map provide you with information about the Purpose and Need, Proposed Action, and Decision Framework. This opportunity to comment will serve as both scoping for this project under the requirements of the National Environmental Policy Act, and the comment period required at 36 CFR 215.3. Comments concerning this proposal must be received by the Forest Service on or before Friday, March 27, 2009. Please refer to the "Public Involvement" section for additional information about submitting comments.

The project is located on the Uncompahgre Plateau about 20 miles southwest of Delta, Colorado, within Sections 19, 20, 21, 28, 29, 30, 31, 32, 33, T. 49N., R. 13W.; Section 6, T. 48N., R. 13W.; Sections 22, 23, 24, 25, 26, 27, 33, 34, 35, 36, T. 49N., R. 14W.; and Sections 1, 2, 3, 4, 9, 10, 11, T. 48N., R. 14W; Montrose County. The project area encompasses about 16,800 gross acres within the Cottonwood Creek and Monitor Creek watersheds. About 1,430 acres of this area is a block of 16 contiguous private land parcels surrounded by National Forest land.

The management emphasis for the Project, as identified in the Amended Land and Resource Management Plan for the GMUG (the Forest Plan), is Timber Management (7A) and Livestock Management (6B). The 2006 Mountains to Mesas Report found this area to be suitable for Forest Restoration Treatments (<http://www.hccaonline.org/page.cfm?pageid=2059>).

The proposal is a product of a collaborative effort involving interested citizens, the Uncompahgre Plateau Project (UPP), the Colorado Forest Restoration Institute at Colorado State University (CFRI), and the Forest Service.

### **BACKGROUND**

The project goal is to reestablish in today's forests some of the characteristics of pre-settlement stands with the aim of restoring the resilience,\* diversity, and productivity inherent in the native ecosystem, but lacking in today's forests. These native forest attributes have been lost over the

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\* Resilience is the capacity of a system to absorb disturbance and reorganize while undergoing change so as to retain essentially the same function, structure, identity, and feedbacks.



past century as a result of the absence of fire and timber harvest, reducing diversity and increasing vulnerability to uncharacteristic stand-replacing fire.

Most of the area proposed for treatment in the Project is low-elevation forest - ponderosa pine and mixed-conifer cover types. Historically, wildfire played a major role in shaping the structure and composition of these forests. Frequent low intensity fires burned in ponderosa pine, reducing the build-up of forest fuels, maintaining relatively open stands by killing (thinning) smaller trees, and creating conditions favorable to the growth of grasses, forbs, and shrubs. The fire regime in the cooler, moister mixed-conifer forests was undoubtedly different. Under a less-frequent mixed-severity regime, fire in places would creep through mixed-conifer forest, consuming little fuel and killing only small trees while in other areas torching and killing groups or patches of large trees.

During the time period since settlement, the project area has seen almost no fire, at least in part due to active suppression of wildfire. This lull in fire activity has brought about changes to these low-elevation forests making them vulnerable to uncharacteristic stand-replacement fire. Without the “thinning” afforded by periodic wildfire, many more seedlings have survived than otherwise would have, and the tree density of these forests has increased considerably. Additionally, there has been a notable species shift in many stands where the once-dominant, fire-loving ponderosa pine is being replaced by more fire-intolerant subalpine fir as well as Engelmann and blue spruces. Finally, the quantity of live and dead vegetation (fuels) has increased in the absence of occasional natural “cleansing” fires, and today represents a high potential for historically uncharacteristic stand-replacement wildfire.

Timber harvest over the past century also has caused changes in forest composition and structure. Commercial tree cutting began soon after settlement and targeted large, old ponderosa pine for lumber production, reducing the number of old, large-diameter live trees and snags, and in some cases diminishing the proportion of pine in species composition.

The changes brought about by lack of fire and timber harvest are evident in two sets of data collected during the summer of 2008. First, a group of interested citizens and land management professionals together with the UPP and the CFRI, collected historic stand reconstruction data on 26 plots located in ponderosa pine and mixed-conifer cover types. Second, the Forest Service contracted a vegetation inventory across about a quarter of the project landscape. Together, these data suggest that today’s forests lack important diversity elements and exhibit a substantial departure in forest structure and composition from that which existed in historic forests, placing them in greater risk of sustaining uncharacteristic stand-replacing fire.

## **PURPOSE AND NEED FOR ACTION**

- There is a need to re-establish within the project area vegetation composition, structure, spatial pattern, and ecological processes necessary to make terrestrial and aquatic ecosystems sustainable, resilient, and healthy under current and future conditions. (Forest Service Interim Directive 2020-2008-1)
- There is a need in the ponderosa pine and mixed-conifer cover types to reduce the likelihood of uncharacteristic stand-replacing canopy fire and to restore our fire-adapted ecosystem.

- There is a need to reduce wildfire spread potential in the wildland/urban interface.
- There is a need to provide wood to local timber companies.
- There is a desire to generate revenue to help fund restoration treatments in the project area by harvesting trees before the commercial potential of stands is lost.
- There is a need to maintain or improve habitat for threatened and endangered species, Forest-Service sensitive species, and other game and non-game species.
- There is a need to manage vegetation in a manner that will provide or maintain a healthy, diverse ecosystem resistant to insects, diseases, and other natural and human impacts.
- There is a need to increase abundance and improve diversity of grasses, forbs, and shrubs in the forest understory.
- There is a desire to develop a range of treatments that achieve the project objectives and, through implementation of a sound monitoring program, a desire to demonstrate treatment successes as a step in adaptive management.

## **PROPOSED ACTION**

### **Fuels Treatment – Wildland/Urban Interface**

The Proposed Action involves the treatment of about 1,100 acres of National Forest land adjacent to private property. Treatments will reduce surface, ladder, and canopy fuels to decrease the likelihood of wildfire spreading between National Forest and private lands. Ladder and canopy fuels, which are usually made up of trees in a wide range of size classes, will be reduced through commercial thinning where possible; otherwise, machinery equipped with cutting or grinding heads will be used. In some areas, prescribed fire will be used as a stand-alone treatment or as a follow-up to mechanical treatment for some ladder fuels as well as to reduce surface fuels. Surface fuels generally consist of grasses, forbs, shrubs, and dead vegetation. Fire control lines will be established along burn unit perimeters. Where possible, existing man-made or natural features, such as roads, trails, and natural rock stringers, will serve as control lines; otherwise, blade-equipped machinery, such as a bulldozer, will be used to create fire breaks. To reduce the likelihood of invasive species establishment, control lines will be seeded as needed following completion of burn operations. Control lines will be surveyed for weed establishment and, where necessary, weeds will be chemically treated.

### **Mechanical Treatments**

The Proposed Action includes the use of commercial timber harvest on 3,000 to 5,000 acres and the use of non-harvest mechanical treatments on 2,000 to 3,000 acres outside the wildland/urban interface to prepare stands for wildland fire use.<sup>1</sup>

**Ponderosa Pine Commercial Harvest:** Commercial harvest will occur on 1,000 to 1,500 acres of ponderosa pine forest. By reducing stand density, tree cutting will help lessen the likelihood of stand-replacement fire, which was not historically characteristic of many of these stands and to which they are currently susceptible. Objectives in these stands is to reduce tree density by

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<sup>1</sup> Wildland fire use, which was recently approved for application on the GMUG, enables land managers to achieve resource benefits from natural wildfire ignitions. Fire use also helps reduce the cost of aggressive suppression actions that otherwise would have been taken. In wildland fire use, the opportunities and risks associated with management of wildland fires are weighed against cost and risks associated with fire suppression.

individual tree thinning to levels that existed in pre-settlement pine forests, which in some cases is close to one-half of their current density. Most existing large old trees will not be cut and existing snags will be retained at or above the Forest Plan Standard. Harvest will also help align tree species composition and size class distribution with that which most likely existed in pre-settlement forests and which is more consistent with historic fire regimes. In an effort to move stands toward a more uneven-aged structure, cutting will also favor the retention of suitable sub-dominant tree classes. Harvest will be accomplished with ground-based wheeled or tracked equipment, which is typical for National Forest timber operations on the Uncompahgre Plateau. Most harvested stands will undergo a post-harvest prescribed burn. Stands will be grouped to form efficient-sized burn blocks.

Mixed-Conifer Commercial Harvest: Between 1,500 and 3,000 acres of harvest is planned in the mixed-conifer type. Mixed-conifer stands are comprised varying mixes of ponderosa pine, Douglas-fir, subalpine fir, aspen, Engelmann and blue spruces. (The distinguishing characteristic between mixed-conifer and spruce/fir stands is the presence of ponderosa pine and Douglas-fir). Like the ponderosa pine type, most mixed-conifer stands have dramatically increased in density in the absence of fire. Additionally, the lack of fire over the past century has led to a shift in species composition away from the fire-tolerant Douglas-fir and ponderosa pine and towards shade-loving, fire-susceptible subalpine fir and spruces. As a consequence, many stands in the mixed-conifer type are structurally pre-disposed to stand-replacing fire, which is not characteristic of historic stands. Mixed-conifer stands will be thinned to reduce density and develop more open conditions characterized by multi-age structure and multi-species tree composition. Cutting will create conditions favorable to Douglas-fir and ponderosa pine regeneration. Additionally, in the few areas where ponderosa pine was targeted in previous harvests to the point where sufficient seed trees may not remain, genetically suitable ponderosa pine seedlings may be hand planted to help improve pine representation in stand composition. Prescriptions will generally favor the perpetuation of aspen on the landscape by inducing its regeneration through mechanical means or prescribed fire.

Spruce/Fir Commercial Harvest: Between 70 and 250 acres of spruce/fir forest will be harvested to generate funds for ponderosa pine and mixed conifer restoration work. Single-tree and group selection will be the primary cutting method; however, clearcut patches between two and five acres may be used where the Forest Service is reasonably assured of achieving regeneration that meets or exceeds Forest Plan standards. Cumulative patch clearcut area will not exceed fifty acres.

Restoration cost for the entire project is estimated at approximately \$1.4 million and revenue generated from timber removed from ponderosa pine and mixed-conifer cover types is expected to generate about \$0.5 million. Harvest in the spruce/fir cover type will contribute an additional \$0.2 million toward restoration costs. It is estimated that 800 acres of group selection in spruce fir would be required to pay all costs for the project; however, there is not sufficient area of the spruce/fir cover type within the project boundary to generate the revenue needed to cover all restoration costs. Of the \$0.7 million that exceeds the anticipated timber revenue, over \$0.2 million consists of prescribed burning costs, which is generally provided through appropriated funding to the Forest Service. Approximately \$0.5 million will need to be sought in grant funding or additional appropriated funding to complete the planned project.

Total commercial timber volume from all treatments involving timber harvest is roughly estimated at 17,000 to 24,000 hundred cubic feet (ccf).

Non-Commercial Mechanical Treatment: About 2,000 to 3,000 acres of mechanical treatment will occur in pine and mixed-conifer stands where commercial quantities of wood do not exist. Work will consist of the reduction of ladder fuels (shrubs as well as seedling, sapling, and pole-size trees) and surface fuels (logs, branches, and needles). Work will be most likely accomplished with equipment outfitted with a chipping, cutting, or grinding head, or by machine piling for later burning by the Forest Service.

All mechanical operations will be conducted utilizing the Watershed Conservation Practices Handbook FSH 2505.25 standards will be followed during project implementation. Winter logging operations will only be permitted on dry or frozen ground or a foot of packed snow.

### **Prescribed Fire**

In most areas of the project, prescribed fire will follow timber harvest or mechanical treatments. Areas to be burned will be grouped into large burn units using natural features for control lines where available. Where necessary, blade-equipped machinery, such as a bulldozer, will be used to create fireline and fuel breaks. Fire control lines will be seeded following completion of burn operations and will be surveyed for weed establishment the year after seeding. Where needed, weeds will be treated. Burning may occur in any season. The size, location, timing, and sequence of burning will consider impacts to downwind communities, livestock permittees, and other users of the National Forest.

### **Slash Treatment**

Where the Forest Service anticipates relatively low slash quantities resulting from timber or other mechanical operations, such as in the ponderosa pine stands in the northern part of the project area, slash will be scattered to facilitate safe post-harvest prescribed fire. In the denser mixed-conifer stands where post-harvest slash will likely be greater, slash may be piled for later burning by the Forest Service.

### **Trails and Transportation**

Existing roads will be used for equipment access to the extent road location and condition permit reasonable access. While most of the project area is well-roaded and road requirements are low, several stands in the center of the project area have no roads. Access to these areas will require the construction of about three miles of temporary roads. No permanent roads will be constructed under this project. Following their use for harvest, temporary roads will be obliterated, which involves recontouring where significant sideslope exists, removal of culverts, elimination of ditches, outsloping the roadbed, removal of ruts and berms, effectively blocking the road to normal vehicular traffic where feasible, and construction of drainage features such as cross ditches and water bars. Invasive species monitoring will occur after road obliteration and will be followed by weed treatment where needed.

The most likely haul routes are either down the Delta/Nucla road (National Forest System Road (NFSR) 503) to Delta or across the Divide road (NFSR 402) to old Highway 90 (NFSR 540) and down to Montrose. Timber hauling during the normal operating season will not be allowed on weekends or holiday weekdays to minimize the likelihood of conflicts with recreationists. If

requested by the timber sale purchaser, winter haul and snowplowing of these roads may be permitted, subject to agreement by the Forest Service. A minimum of four inches of snow will be left on the road surface. Colorado state law prohibits the use of snowmobiles on roads open to wheeled traffic; plowed roads will be closed to snowmobile use during non-holiday weekdays, and closed to wheeled traffic on weekends and holidays. The timber purchaser will post signs on plowed roads advising the public of these restrictions.

The Tabeguache Trail, National Forest System Trail (NFST) 544.1A; the Cottonwood Trail, NFST 103; and the 47 Trail, NFST 100, are located within the project area. During contract operations, trails will remain open to designated public use. NFST 544.1A is a non-motorized trail open to mountain bike travel. Project equipment will not be allowed on this trail. NFST 103 forms the boundary of a unit and equipment will not be allowed on this trail. NFST 100 is a motorized trail open to ATV use and was formerly a road. It will be used for log haul and equipment access during the life of the project.

Roads and trails identified in the Uncompahgre Travel Plan Record of Decision of 2002 for decommissioning will be decommissioned as a result of this project. Approximately 20 routes could be utilized during project implementation for a combination of purposes, including haul routes and fire line. Upon completion of the use of these routes they would be decommissioned as decided in the travel plan decision.

### **Monitoring and Demonstration**

Monitoring is an important component of the proposal. The Forest Service will collaborate with CFRI, UPP, and interested public to monitor project treatment outcomes. The monitoring group will evaluate treatment results to improve future management practices. To collect baseline information, monitoring will be conducted prior to each activity in a treatment sequence, and following each treatment to determine the extent to which objectives were achieved. Additionally, a long term monitoring protocol will be developed to track attributes that require a longer view to detect, such as species and structural changes to vegetation communities.

#### **Monitoring Issues**

- After one year, how does vegetation respond to treatment in terms of quantity and diversity? After five years?
- Are invasive species spread by equipment or animals? How can invasive species be reduced in future projects?
- What are the influences of livestock and big game browsing on understory vegetation response following treatments?
- Does pre-burn mechanical treatment prepare the area as expected for prescribed fire? Is post-burn tree mortality within the anticipated range? Are post-burn stand conditions conducive to implementation of wildland fire use?

The Forest Service expects that work described in this proposal will be accomplished through one or more stewardship contracts. Field preparation will begin in fall 2009 and contract award will occur in late summer of 2010. Work will likely occur over a five or six year period.

## **DECISION FRAMEWORK**

An Environmental Assessment (EA) will document the impacts analysis of project activities and will be tiered to the Forest Plan. The EA will not reanalyze management area allocations already specified in the Forest Plan nor will it seek to reexamine federal regulations or Forest Service policy regarding timber harvest on National Forest lands.

Tammy Randall-Parker, the Ouray District Ranger, is the Responsible Official. Her decision will be detailed in a Decision Notice, which she anticipates issuing in late spring of 2009. Given the Purpose and Need, she will review the Proposed Action, other alternatives, and mitigation measures in order to make the following decisions:

1. Whether or not to apply mechanical treatments, harvest timber, implement prescribed burning, construct temporary roads, and conduct other support activities on National Forest lands within the project area to meet the stated purpose.
2. If an action alternative is selected, under what conditions and by which methods timber harvest, mechanical treatments, prescribed burning, and associated activities will be conducted.

## **PUBLIC INVOLVEMENT**

This opportunity to comment serves two purposes: first, as scoping for this project under the requirements of the National Environmental Policy Act, and second as the comment period required at 36 CFR 215.3. The opportunity to comment on the Proposed Action ends 30 days following the date of publication of the legal notice of opportunity to comment in the Montrose Press. Comments may be submitted as follows and must be received by March 27, 2009.

<b>Written Comments via the U.S. Postal Service or hand delivered:</b>
Ouray Ranger District "Uncompahgre Mesas Project" Attention: Tim Garvey 2505 South Townsend Montrose, CO 81401
<b>Written Comments via e-mail:</b>
To: <a href="mailto:comments-rocky-mountain-gmug-ouray@fs.fed.us">comments-rocky-mountain-gmug-ouray@fs.fed.us</a> Subject: <b>Uncompahgre Mesas Project</b>
<b>Written Comments via facsimile:</b>
(970) 240-5367 Attention: Tim Garvey, <b>Uncompahgre Mesas Project</b>
<b>Oral Comments via telephone or in person:</b>
Tim Garvey (970) 240-5401 USDA Forest Service 2505 South Townsend Montrose, CO 81401

Office hours for hand delivery are 8:00 am to 4:30 pm weekdays at the Ouray Ranger District office. Those people responding to this scoping letter will be included on the mailing list for future information related to this project.

In accordance with 36 CFR 215.6(a)(3), individuals or organizations wishing to be eligible to appeal must comment during this 30-day comment period and provide the following information: submitter's name and address, title of the Proposed Action, specific substantive comments on the Proposed Action, along with supporting reasons that the Responsible Official should consider in reaching a decision, and signature or other verification of identity. Those submitting electronic comments (fax or e-mail) may submit a scanned signature. Oral comments must be provided at the Responsible Official's office during normal business hours via telephone or in person, or if during non-business hours, must be at an official agency function, which is designed to elicit public comment.

Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record on this Proposed Action and will be available for public inspection. Comments submitted anonymously will be accepted and considered; however, those who submit anonymous comments will not have standing to appeal the subsequent decisions under 36CFR Part 215. Additionally, pursuant to 7 CFR 1.27 (d), any person may request the agency to withhold a submission from the public record by showing how the Freedom of Information Act (FOIA) permits such confidentiality. Persons requesting such confidentiality should be aware that, under the FOIA, confidentiality may be granted in only very limited circumstances, such as to protect trade secrets. The Forest Service will inform the requestor of the agency's decision regarding the request for confidentiality, and where the request is denied the agency will return the submission and notify the requestor that the comments may be re-submitted with or without name and address within 15 days.

At this time, the Forest Service plans to document the effects of this proposal in an environmental assessment. A Decision Notice documenting the Responsible Official's decision will be issued after the environmental assessment is completed. A Legal Notice of Decision will be published at that time in the Montrose Daily Press.

**FURTHER INFORMATION:** For more information concerning this proposal, please contact Tim Garvey at (970) 240-5401.

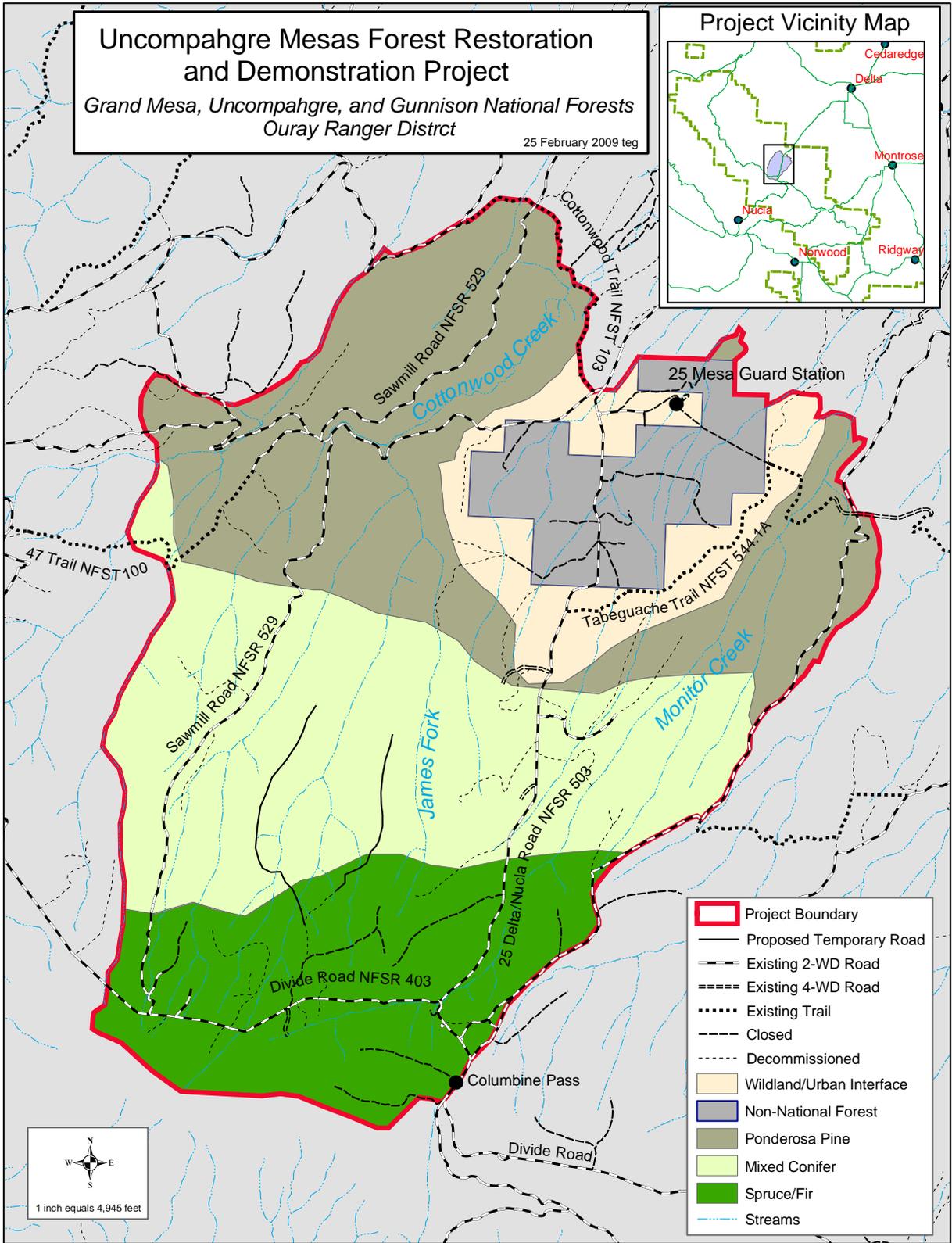
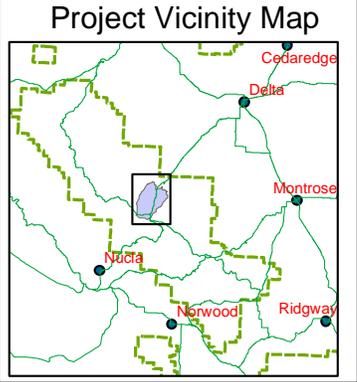
Sincerely,

*/s/ Tamera Randall-Parker*  
TAMERA RANDALL-PARKER  
District Ranger

# Uncompahgre Mesas Forest Restoration and Demonstration Project

Grand Mesa, Uncompahgre, and Gunnison National Forests  
Ouray Ranger District

25 February 2009 teg



- Project Boundary
- Proposed Temporary Road
- Existing 2-WD Road
- Existing 4-WD Road
- Existing Trail
- Closed
- Decommissioned
- Wildland/Urban Interface
- Non-National Forest
- Ponderosa Pine
- Mixed Conifer
- Spruce/Fir
- Streams