



May 2008

United States
Department of
Agriculture

Forest
Service

Appendix A: Response to Comments

Forest-wide Hazardous Tree Removal and Fuels Reduction Project

Medicine Bow-Routt National Forests

Albany and Carbon Counties, Wyoming
Routt, Jackson, Grand, Moffat, Rio Blanco, and Garfield Counties, Colorado



Rabbit Ears Pass – Routt National Forest

Responsible Official:

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Purpose of Appendix A

Appendix A provides a paraphrased summary of, and Forest Service responses to, comments received during the 30-day public comment period for the Forest-wide Hazard Tree Removal Project Environmental Assessment (EA).

The Public Comment Period

The Forest Service mailed a Scoping (40 CFR 1501.7) letter describing the Proposed Action and Purpose and Need for the Project to 154 individuals, organizations, and agencies on June 29, 2007. That same day, a news release describing the proposal was mailed to local media stations. Both the Scoping letter and the news release indicated that the comment period would end on July 13, 2007. The Forest Service received 13 comment letters in response to the June 29, 2007 Scoping effort.

On October 19, 2007 the Forest Service re-initiated Scoping for two reasons: 1) the Proposed Action had been modified slightly; and 2) the Forest Supervisor had determined that the proposal is an “authorized project” under the Healthy Forests Restoration Act (HFRA), Title I, Sec. 102(a)(4) (insect and disease epidemics). Therefore, the project was transitioned from the National Environmental Policy Act (NEPA) analysis that was in progress to the environmental analysis process authorized under Section 104 of the HFRA.

The October 19, 2007 Scoping letter, which was mailed to 234 individuals, organizations, and agencies, indicated that the Scoping period would be the only opportunity for the public to comment on the proposal. The 30-day comment period was initiated on October 29, 2007 following publication of a legal notice in the Laramie Boomerang on October 28, 2007.

During the comment period the Forest Service hosted five public field trips and two Open House meetings. Field trips were held in Laramie, WY and Yampa, CO on November 6; Steamboat Springs, CO on November 7; Walden, CO on November 8; and Saratoga, WY on November 9. The Open House meetings took place on November 15, 2007 in Steamboat Springs, CO and in Laramie, WY.

When the comment period ended on November 27, 2007 the Forest Service had received an additional 23 public comment letters bringing the total comment letters received to 36 for the two Scoping efforts. The comment letters are available for review at the Laramie Ranger District office in Laramie, Wyoming

Comments and Analysis

This Appendix contains a summarized version of the comments that were received during the June and October, 2007 comment periods. Forest resource specialists and staff of the Medicine Bow-Routt National Forests reviewed the comments, and appropriate resource specialists generated responses to the comments. Some of the comments received were similar in nature and were, therefore, combined for response. In these instances, the comments were combined into one general comment category and examples of specific comments were extracted from the letters. WHILE YOUR COMMENT MAY NOT BE ONE OF THOSE THAT WAS EXTRACTED AND USED AS AN EXAMPLE, IT WAS CONSIDERED INDIVIDUALLY.

Commentor List

All of the individuals, organizations, and agencies who commented during the June and October 2007 comment periods for the Forest-wide Hazard Tree Removal project are listed below.

Commentors Listed Alphabetically by Last Name

Commentor	Letter #
Bennett, Jim	26
Biodiversity Conservation Alliance	1, 16
Board of Co Commissioners, Jackson County	31
Board of Public Utilities, Cheyenne	3
Christensen, Martha	34
Colorado Wild	13, 23
County of Jackson	10
Dale, Daniel	20
Delta Timber Company	12
Dept. of Road & Bridge	6
Evans, Dinda	18
Focused on the Forest, LLC	5, 36
Garner, Margaret	24
Garvey, Lydia	21
Hohnholz, Michael and Barbara	33

Commentor	Letter #
Jago, Dan	2
Kenny, Marilyn	22
Kosnik, Don	30
La Point, Peggy	19
Laybourn, Bob	35
Little Snake River Conservation District	8
Lux, Jan	4
Mayer, Sigrid	7, 25
Peirce, Susan	17
Read, Donald	9, 14, 15
Rittmueller, James	27
Timmermeyer, Steven and Sandra	28
Wensky, Bob and Ann	29
Wyoming Dept. of Agriculture	11
Wyoming Game and Fish Dept.	32

Issue 1: Proposed Action

1a: The Proposed Action is “Fear-based”

Comment 1	“The Proposed Action presents “potential” danger as “actual” danger. Using fear to gain public approval for logging up to 300/400 ¹ foot wide corridors leads the public toward emotion-based panic and away from an objective science-based reality.”
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Letter Number(s): 1, 7, 16, 17, 18, 21, 24, 25, 35

Comment 2	“It appears that the Forest is creating "fuel load fear" and is using this fear as a fire to be added to the fear of falling trees to open the door for commercial biomass extraction from the Forest.”
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Letter Number(s): 1, 16

Response: *The Forest Service’s proposal to fell and/or remove hazardous trees along travel corridors and in and adjacent to developed recreation and administrative sites was in no way intended to strike fear in the public. Our intent is to focus on what we can do to minimize the effects of the widespread tree mortality caused by the mountain pine beetle epidemic on human health and safety. Research shows that dead, mature lodgepole pine trees begin to fall after three years and that the majority of trees fall within 14 years (Mitchell and Preisler 1998). It is anticipated that many of the dead trees on the Medicine Bow and Routt National Forests (NFs) will fall across roadways, in administrative sites, across trails, and in developed recreation sites. This situation will create hazardous conditions for forest visitors and employees either directly or indirectly (i.e. access into or out of areas may be blocked by fallen trees) and will increase the potential for property damage. The Proposed Action – Modified identifies actions that can be taken to minimize these hazards.*

Page 3 of the EA provides a definition of hazardous trees along with a host of criteria that will be used when identifying hazardous trees for removal. These criteria will be adhered to during project implementation, and all healthy trees and dead and dying trees leaning away from roads, trails, developed sites, and other structures will be retained unless they pose a safety hazard during the felling/removal operations. The Proposed Action – Modified also contains a variety of design criteria that were developed to reduce or prevent undesirable effects resulting from management activities. These, too, will be strictly adhered to during project implementation to ensure that public safety is enhanced while minimizing impacts to resources.

EA/Project Record:

EA page 3

EA pages 16 - 20

¹ The June 29, 2007 Scoping letter indicated that standing dead and dying trees would be felled and/or removed up to 200 feet from the centerline of roads whereas the October 19, 2007 Scoping letter indicated 150 feet.

1b: Proposed Corridor Width

1b1: The Proposed Corridor Width is Excessive

Comment 1	“Since the maximum tree height is likely to be 85 feet or less, 200/ 150 feet seems excessive. Implementing cutting for this distance would have the negative effect of creating a linear corridor up to 400/ 300 feet wide in some areas. This would increase forest edge habitat, exacerbate the introduction of exotic species, increase fragmentation, and reduce hiding cover. All cutting should be limited to 120% of the height of the tallest beetle killed tree that is seriously threatening the safety of forest visitors and only if that tree is scientifically determined to be a significant and unusual threat to forest visitors. Rather than address safety from a landscape or corridor perspective, each tree posing a verifiably real and immediate safety threat should be identified and dealt with individually, similar to the way commercial logging examines individual trees for their economic value.”
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Letter Number(s): 1, 13, 16, 23

Response: Please refer to the second paragraph of the response to comment 1a above.

EA/Project Record:

EA page 3

EA pages 16 - 20

1b2: Corridor Width Suggestions

Comment 1	“All infested dead or susceptible trees down to a 4 inch dbh should be removed to at least a chain length (66 ft) from the road or trail surface. Care should be taken to protect the remaining live vegetation and obstacles should remain in place to delineate roadways and trails. Mitigating these areas in this manner would aid in the protection of threatened communities and critical infrastructure from wildfire as well as protect the visiting public from falling trees.”
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Letter Number(s): 6, 34

Response: Thank you for your comment. The Forest Service has included a definition of hazardous trees along with a host of criteria that will be used when identifying hazardous trees for felling and/or removal (EA page 3). While neither identifies a specific dbh, the Proposed Action – Modified implies that all trees posing a hazard to public health and safety would be felled and/or removed. The Proposed Action – Modified also includes a list of design criteria that will be implemented to ensure protection of natural and social resources (EA pages 16 – 20).

EA/Project Record:

EA page 3

EA pages 16 - 20

Comment 2	“Due to the variable differences in state and county roads and their ROWs within the forests, we suggest changing 200 feet to 300 feet due to the amount of affected areas that could be and should be treated for public safety and fuel hazard reduction. The 300 foot from centerline of state or county road should not cause any great level of analysis, but would provide almost an 1/8 mile of a buffer/break in the landscape.”
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Letter Number(s): 8

Comment 3	“Specifically in Jackson County, dead and dying trees should be felled and removed (not and/or removed) up to 200 feet, but not less than 100 feet from the centerline of all roads and trails that are shown on the "draft" MVUM for the Routt NF.”
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Letter Number(s): 10, 31

Response: *The purpose of this project is to manage forest vegetation affected by the mountain pine beetle epidemic while reducing threats to public safety. This will be accomplished by felling and/or removing trees that are dead and dying along roads and trails, within and adjacent to Forest Service developed recreation sites (campgrounds, trailheads, etc.), and within and adjacent to Forest Service administrative sites of the Medicine Bow-Routt National Forests. This project is needed to reduce the hazard to public safety due to the risk of dead and dying trees falling. The project is not intended to clear ROWs, just eliminate potential hazards to the public. Dead and dying trees up to 1 1/2 tree heights (or 150') from the centerline of a road or trail that poses a risk to the public will be identified, felled, and/or removed. Not all felled hazard trees can be removed from the land due to various resource concerns. If a protected resource area would be negatively impacted by removal of the felled tree, the tree will be left in place.*

Relating to the MVUM, this project covers areas impacted by the Bark Beetle epidemic. The MVUM includes all Forest roads and motorized trails open to the public. There will be some roads and trails identified on MVUM's that are not located within Beetle-killed areas and will therefore not be treated. Those roads and trails not specifically included in the Beetle-killed areas but requiring roadside brushing and clearing will be dealt with as budget and time allows.

EA/Project Record:

EA page 4, Purpose and Need

1c: Jurisdictional Responsibility

Comment 1	“If the wording in your proposal is correct, all the landowners along my county road, which accesses the Rainbow Lakes Trailhead Area, would not have to worry about the cutting and removal of any dead or dying beetle trees and slash. Is this what the proposal really says? Is the FS going to foot the bill for this or will the adjacent landowners be billed?”
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Letter Number(s): 4

Response: *The affected environment includes: (1) all State and County roads that cross National Forest System (NFS) lands; (2) National Forest System Roads under Forest Service jurisdiction that*

are open to public travel; and (3) National Forest System Trails. Jurisdiction is defined as the legal right to control and regulate the use of a transportation facility. Roads on NFS lands are under the control of the Forest Service, with a few exceptions:

- Public roads established under the Act of July 26, 1866, private roads;
- Roads for which the Forest Service has granted rights-of-way to private landowners or public road agencies; and
- Roads whose use and rights pre-date the National Forest. (FSH 7709.59.21)

As long as the road accessing private property is under Forest Service jurisdiction and is open to public travel, any treatment will be at Forest Service expense. However, depending on available funding, not all roads will be treated at the same time. Consequently, it may take years for the Forest Service to implement treatments along all roads. See "Scheduling Priorities" (EA page 3).

EA/Project Record:

FSH 7709.59.21

EA page 3

EA pages 32 - 34

Comment 2	"There also should be thought given to public lands (FS administered) adjacent to private lands. Many private land owners are currently undertaking massive and expensive fuels reduction projects on their own. Meanwhile, on the other side of the fence, in public lands, nothing is being done to protect, enhance, or increase public safety to life, structures, livestock, etc."
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Letter Number(s): 9

Response: While we recognize the importance of removing hazardous trees adjacent to communities, such actions are beyond the scope of this proposal. However, in response to your concern, the Forest is currently working on several larger projects that address fuels treatments adjacent to WUI (Wildland Urban Interface) areas, private in-holdings, and other values at risk. Some examples of these projects include the Ryan Park Hazardous Fuels, White Rocks Estates Fuels, Battle Hazardous Fuels, Fox Park, Rainbow Valley, Seedhouse, Gore Lakes Communities, Red Dirt Communities, Steamboat Springs, Spruce Gulch, and Stagecoach.

Project Record:

EA page 13

1d: The Proposal is Too Vague

Comment 1	"The extent of the PA falls short of some major steps necessary for public safety. The proposal speaks only to roads and trails within and adjacent to administrative sites and recreation sites. It is critical that the FS identify similar areas of exposure throughout the Forest landscape to provide potential escape routes throughout the Forest. In addition, I believe there should be additional treatment proposed for protection of other critical public components that affect public safety. These include our major power transmission line corridors as well as critical watershed areas."
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Letter Number(s): 12

Response: *Under the Proposed Action – Modified, hazardous trees that pose a hazard to human safety would be felled and/or removed along all roads and trails on the Medicine Bow and Routt National Forests; not just in areas adjacent to administrative and recreation sites. While we do recognize the importance of removing hazardous trees adjacent to communities and throughout the landscape to reduce catastrophic wildfire potential, such actions are beyond the scope of this proposal. Given the qualitatively different nature of the two types of proposals, we believe that each would be better addressed through separate site-specific project level analyses. As such, in addition to the Hazardous Tree Removal project, the Forest is also working on several larger projects that address fuels treatments adjacent to WUI (Wildland Urban Interface) areas, private in-holdings, and other values at risk. Some examples of these projects include the Ryan Park Hazardous Fuels, White Rocks Estates Fuels, Battle Hazardous Fuels, Fox Park, Rainbow Valley, Seedhouse, Gore Lakes Communities, Red Dirt Communities, Steamboat Springs, Spruce Gulch, and Stagecoach.*

EA/Project Record:

EA page 13

Comment 2	“The Proposed Action is too limited in scope to address wildfire potential, especially adjacent to private lands. Consider fuel breaks, pre-attack lines, etc. around communities with CWPPs (Community Wildland Protection Plans).”
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Letter Number(s): 14

Response: *As mentioned above, the Forest has been addressing fuels treatments adjacent to WUI (Wildland Urban Interface) areas, private in-holdings, and other values at risk through separate NEPA analyses. Some examples of these are Ryan Park Hazardous Fuels, White Rocks Estates Fuels, Battle Hazardous Fuels, Fox Park, Rainbow Valley, Seedhouse, Gore Lakes Communities, Red Dirt Communities, Steamboat Springs, Spruce Gulch, and Stagecoach. Many of these communities have CWPPs in place.*

EA/Project Record:

EA page 13

1e: Undeveloped Sites

Comment 1	“In past discussions with the FS, we had brought up the issue of also treating the "high use undeveloped (primitive campsites) recreation sites" adjoining State Highway 70 often served by WYDOT pullouts. These sites often cumulatively host more use than the developed sites and deserve to be incorporated into the PA.”
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Letter Number(s): 8

Response: *Thank you for your comment. Most primitive, undeveloped sites are generally within the project area due to their proximity to roads and trails. Consequently, they are included in the Proposed Action - Modified.*

Project Record:

Map of the Proposed Action – Modified

1f: Priority Areas

Comment 1	“We suggest that the FS incorporate the following into the “Priority for scheduling treatment...” statement: Priority for scheduling treatment would be determined upon consultation with state and local government and industry; and the severity of bark beetle infestation, mortality of trees, and the degree of safety hazard posed by the proposed treatment areas; and areas where interest has been shown to provide treatment.”
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Letter Number(s): 8

Comment 2	“The only trees that should be removed are those that pose an immediate threat to public structures and property in the Wildland Urban Interface zones and those that could harm people.”
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Letter Number(s): 18, 19, 20, 24

Comment 3	“The following areas should receive priority treatment: 1) Trees that pose a risk to improvements on private property 2) Trees within fall distance of powerlines 3) Trees in areas covered by CWPPs 4) Trees along high-use roads (south of Gould)”
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Letter Number(s): 36

Response: Thank you for your comments. Page 3 of the EA indicates that the priority for scheduling treatments would be determined annually by the severity of bark beetle infestation, tree mortality, the severity of safety hazard posed, and public interest. The term “public interest” is all encompassing and includes state and local government and timber industry as well as the public at large. Hazard tree removal along powerlines is beyond the scope of this analysis. There are other site-specific NEPA processes underway to address hazard tree removal adjacent to power distribution lines. The NEPA process for these special uses is the responsibility of the permittee. Please see the Forest Service’s response to Comment 1d for areas adjacent to private lands and communities.

Project Record:

EA page 3

1g: Fuel Loading

Comment 1	“Many communities and subdivisions within WUI areas are completing CWPPs. Federal agencies have been present at these meetings and have not addressed this fuel loading problem along boundaries between private and federal lands.”
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Letter Number(s): 9

Response: *The Forest has been addressing fuel loading along boundaries between private and federal lands. Following is a list of projects and communities where the Forest is either completing analyses or in the process of implementation: Ryan Park, White Rocks Estates, Battle Hazardous Fuels, Fox Park, Rainbow Valley, Seedhouse, Gore Lakes Communities, Red Dirt Communities, Steamboat Springs, Stagecoach, Spruce Gulch, Upton/Osage, and Wildcat Draw (Esterbrook). Many of these communities have CWPPs in place.*

Project Record:

N/A

1h: Outcomes and Design Criteria

Comment 1	“Specify the work to be done in terms of objectives and desired outcome, not the means to accomplish the outcome. Selective harvest techniques should be considered over clearcutting due to erosion issues.”
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Letter Number(s): 5, 22

Response: *Page 3 of the EA contains a definition of hazardous trees along with a host of criteria that will be used to determine whether or not individual trees are in fact hazardous and need to be felled and/or removed. In some areas, only a few trees may need to be felled and/or removed while in others, all trees may need to be felled and/or removed. These situations will be identified on-the-ground during project implementation.*

Project Record:

EA page 3

1i: Support for the Proposed Action

Comment 1	“I support the proposal and feel that it should be implemented as expeditiously as possible.”
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Letter Number(s): 26, 27, 28, 30, 31, 33

Response: *Thank you for your support.*

Project Record:

N/A

Issue 2: Information Requests

2a: Incident Reports and Levels of Threat

Comment 1	“The FS needs to produce credible scientific documents and FS incident reports that indicate the actual cases of trees falling on and harming forest visitors. Has the Forest researched and discovered peer reviewed statistics that indicate trees falling on the public are a significant problem in the US anywhere? If yes, please provide these studies and statistics.”
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Letter Number(s): 1, 16

Comment 1	“The FS must establish a verifiable and realistic level of threat to forest users before arbitrarily proposing a 400/300 foot wide corridor open to logging. What statistical figure(s) did the Forest use to determine that the odds of a tree falling on a forest visitor were high enough to initiate the Proposed Action? What is the scientific source of this information?”
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Letter Number(s): 1, 16

Response: *Research shows that dead, mature lodgepole pine trees begin to fall after three years and that the majority of trees fall within 14 years (Mitchell and Preisler 1998). It is anticipated that many of the dead trees on the Medicine Bow and Routt National Forests (NFs) will fall across roadways, in administrative sites, across trails, and in developed recreation sites. This situation will create hazardous conditions for forest visitors and employees either directly or indirectly (i.e. access into or out of areas may be blocked by fallen trees) and will increase the potential for property damage. The Proposed Action – Modified identifies actions that can be taken to minimize these hazards.*

Page 3 of the EA provides a definition of hazardous trees along with a host of criteria that will be used when identifying hazardous trees for removal. These criteria will be adhered to during project implementation, and all healthy trees and dead and dying trees leaning away from roads, trails, developed sites, and other structures will be retained unless they pose a safety hazard during the felling/removal operations. The Proposed Action – Modified also contains a variety of design criteria that were developed to reduce or prevent undesirable effects resulting from management activities. These, too, will be strictly adhered to during project implementation to ensure that public safety is enhanced while minimizing impacts to resources.

Project Record:

EA page 3

EA pages 16 - 20

2b: Liability Issues

Comment 1	“Convey to the public the actual level of legal liability the Forest possesses should a forest visitor be harmed or even killed by a falling beetle-killed tree. Cite all court cases brought against the FS by forest visitors for injuries or deaths related to visits and the outcome of those cases. Cite all rules and regulations pertaining to the FS’s obligation to assure the safety of forest visitors. Explain to the public why these rules and regulations are being applied to this proposal to log beetle killed trees and not to other more clear and present safety issues on the Forest, such as those safety issues associated with motorized recreation. Scientific studies are readily available to address the relative safety concerns of various forest recreation activities and inherent risks such as death and injury caused by falling trees. The Forest is obligated to seek and find this information and to inform the public of the true safety risks.”
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Letter Number(s): 1, 16

Response: *Research shows that dead, mature lodgepole pine trees begin to fall after three years and that the majority of trees fall within 14 years (Mitchell and Preisler 1998). It is anticipated that many of the dead trees on the Medicine Bow and Routt National Forests (NFs) will fall across roadways, in administrative sites, across trails, and in developed recreation sites. This situation will create threats to public safety either directly or indirectly (i.e. access into or out of areas may be blocked by fallen trees) and/or will increase the potential for property damage. Where hazards exist, felling trees all at one time rather than allowing them to fall continuously and haphazardly will greatly improve public safety.*

Forest Service Manual (FSM) 2332.11 (Public Safety, Hazard Trees) requires the Forest Service to fell and remove hazardous trees in developed recreation sites (e.g., campgrounds, picnic grounds) prior to their being opened to public use. Forest Service Manuals and Handbooks and the Highway Safety Act of 1966 are clear that the Forest Service has a responsibility to maintain the safety of its roads and trails. These documents “Authorize State and local governments and participating Federal agencies to identify and survey accident locations; to design, construct and maintain roads in accordance with safety standards; and promote pedestrian safety.” Forest Service Manual 7731.1 states, “Manage forest development roads that are not subject to the Highway Safety Act (those not suitable for passenger car traffic) so they are safe for the planned use.” If roads cannot be maintained for safe public use, they would need to be closed.

The “Scheduling Priorities” section of the EA (page 3) indicates that the Proposed Action – Modified would be implemented over a 10-year period. It also identifies that annual scheduling priorities would be determined by: a) the severity of bark beetle infestation, tree mortality, the severity of safety hazard posed; b) maintaining safe access to important public recreation sites and trails; c) maintaining requested ingress/egress to private inholdings; d) public desires for maintaining access into the NFs; e) protection of facilities listed on the National Register of Historic Places; and f) protection of administrative sites, particularly those used to house seasonal employees. If areas containing hazardous trees cannot be treated, they will be closed until they are safe for public use.

Please refer to the Purpose and Need for Action section of the EA (page 6). This section outlines why the Forest Service is proposing the project in the first place.

Project Record:

EA page 3

EA page 6

Issue 3: Value of Dead Trees

3a: Value of Dead Trees Outweighs Potential Hazards

Comment 1	“The benefits of dead and dying trees are numerous; these benefits must be factored in when any proposal to remove trees for “human safety sake” is set forth. Dead trees create snags which serve as nest sites and many other forms of wildlife shelter...From bacteria and fungi to insects, birds, reptiles, and mammals, dead trees inherently become the essence of forest and wildlife regeneration.”
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Letter Number(s): 1, 16

Response: Generally, pine beetles on the Forest have been causing tree mortality that results in the loss of most or all pine trees >6 inches dbh in affected areas. Aerial surveys conducted annually for the Medicine Bow-Routt National Forests (MBR) show that losses of lodgepole pine to mountain pine beetles have increased significantly in extent and number over the past 11 years. For example, on the Medicine Bow National Forest in southern Wyoming, aerial survey data from 1996 showed only 10 acres impacted by mountain pine beetles. By 2007, that number had increased to 178,000. On the Routt National Forest, roughly 230 acres of lodgepole pine trees showed evidence of beetle-caused mortality in 1996. By 2007, that number had increased to 350,000 acres. As these numbers indicate, thousands of acres of dead and dying trees will be available across the MBR providing the habitat for a wide array of species that require snags and dying trees for their existence. However, the snags are expected to remain standing for a relatively short time period (3 – 15 years). The Biological Assessments, Biological Evaluations and Management Indicator Species reports for this project also indicate how the stands of dead and dying trees will benefit, or be a detriment, to individual wildlife species.

Project Record:

Biological Evaluation – Routt National Forest

Biological Evaluation – Medicine Bow National Forest

Management Indicator Assessment – Routt National Forest

Management Indicator Assessment – Medicine Bow National Forest

Biological Assessment – Routt National Forest

Biological Assessment – Medicine Bow National Forest

Issue 4: Visual Quality

4a: Forest Plan Visual Quality Objectives Cannot be Met

Comment 1	“The very wide treatment area would not allow maintenance of visual quality and achievement of visual quality objectives. Removing trees for 150 feet around developed recreation sites and/or the roads leading to them is excessive. Areas cut in this manner would begin to resemble timber sale areas, destroying the natural appearances sought by users of developed sites. The presence of stumps and large amounts of slash might change the visual condition to maximum modification. No management prescription in the Forest Plan has a visual quality objective of maximum modification.”
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Letter Number(s): 1, 16

Response: *As outlined in the Proposed Action – Modified, only hazardous dead and dying trees would be removed; healthy, stable, live trees and dead trees leaning away from roads and trails would be retained. Removal of the dead and dying trees would allow young understory trees to grow faster. Further, adjacent healthy trees would be maintained and protected to provide present and future scenic quality. The Proposed Action - Modified would comply with the adopted Scenic Integrity Objectives (SIOs) and Visual Quality Objectives (VQOs) in most areas when the design criteria on scenic/visual resources are followed. Trail sections with large amounts of felled trees on the ground that are visible when viewed from trail would appear as Low or Very Low SIO instead of High or Moderate SIO, and Modification or Maximum Modification VQO instead of Retention or Partial Retention VQO. Sections of road corridors where heavy felling and removal of dead and dying trees would occur would appear as Low SIO instead of Moderate SIO and Modification VQO instead of Partial Retention VQO. SIOs and VQOs are identified as guidelines in the Forest Plan. Deviations from guidelines must be analyzed during project level analyses and documented in project decisions; they do not require a Forest Plan amendment.*

Project Record:

EA page 15

EA page 48

Issue 5: National Environmental Policy Act (NEPA)

5a: Use of a Categorical Exclusion (CE) is Inappropriate

Comment 1	“Given the far reaching nature of the proposed project, the use of a CE is inappropriate. The CEs cited are not applicable to the proposed project. Categories 3 – 5 are for repair of actual facilities, not to a 200 foot wide swath around facilities. CE 4 allows “grading a road and clearing the roadside of brush without use of herbicides,” but it would be an extreme stretch to say that this could apply to, or was ever intended to be used for, removing all trees for a distance of 200 feet on either side of a road. When a single project has the effect of disrupting the natural ecological cycle for decades to come, the Forest can, in no way, invoke a CE under a FONSI.”
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Letter Number(s): 1, 7, 13, 16

Response: Thank you for your comment. Although the June 29, 2007 scoping letter indicated that a CE would be prepared for the Forest-wide Hazardous Tree Removal project, a second scoping document was mailed to the public on October 19, 2007. This second document indicated that the project was to be completed under the Healthy Forests Restoration Act (HFRA) and that an Environmental Assessment (EA) would be prepared. The legal notice announcing the availability of the EA for administrative review was published in the Laramie Boomerang. The legal notice began a 30-day objection-filing period for this project.

Project Record:

June 29, 2007 Scoping Letter
October 19, 2007 Scoping Letter
April 2008 EA
April 2008 Legal Notice

5b: An Environmental Impact Statement (EIS) is Required

Comment 1	“An EIS should evaluate the impacts from the full potential of incremental hazard tree removal and fuel reduction actions over time. Any lesser scale analysis of potential impacts would be considered a fragmentation of the NEPA process.”
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Letter Number(s): 16, 23

Response: During the development of the Proposed Action - Modified, numerous design criteria were developed to ensure protection of natural resources. The analysis of this alternative indicated that effects from project implementation would be non-significant and in compliance with both the Routt and the Medicine Bow Land and Resource Management Plans (Forest Plans). Therefore, completion of an environmental assessment was deemed sufficient.

Project Record:

EA pages 16 - 19
EA pages 23 - 64

5c: Contact List

Comment 1	“We request that grazing permittees be notified as this project affects their grazing permits and their ability to graze livestock on the national forest.”
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Letter Number(s): 11

Response: The Forest Service will work with livestock grazing permittees to ensure that their ability to administer their permits is not impaired by project implementation.

Project Record:

N/A

Issue 6: Old Growth

6a: Regulatory Requirements

Comment 1	“How does the Forest proposed to deal with the issue of old growth in a manner consistent with the Forest Plan, NEPA, MBTA, the ESA, FLPMA, and the balance of Rules, Regulations, Policies, and federal statutes to which it is bound to honor?”
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Letter Number(s): 1, 16

Comment 2	“The proposal is too vague and seems to open the door to a lot of unnecessary destruction of old growth.”
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Letter Number(s): 7

Response: *Inventory and mapping of old growth on the Medicine Bow National Forest has been completed; the effort was responsive to old growth standards and guidelines contained in the Medicine Bow Revised Land and Resource Management Plan (Forest Plan 2003). On March 10, 2008 a new letter indicating that the inventoried and mapped information is to be used during project planning was issued to District Rangers, Resource Team Leaders, and Directors.*

The stated purpose of the Forest-wide Hazardous Tree Removal and Fuels Reduction Project is identified on pages 6 and 7 of the EA.

During the analysis process for this project, design criterion 14 was incorporated into the Proposed Action – Modified to reduce actions within inventoried and mapped old growth to those necessary to reduce threats to public safety. This criterion reads as follows:

“Within old growth areas identified in the old growth strategy on the MBNF, hand fall and leave fallen trees in place. If necessary, fallen trees may be stabilized to prevent movement onto a roadway. Lop and scatter slash to a height of less than 24 inches above the ground. Do not designate landings in these areas”

The Revised Forest Plan (1997) for the Routt National Forest contains the following direction for late succession forests:

Geographic Area Guidelines Late Successional Forests *For Geographic Areas: Arapahoe Creek, Corral Peaks, Encampment River, Owl Mountain, Pinkham Mountain, Willow Creek, Little Snake, Sand Mountain, Slater Creek, Upper Elk River, Gore and Red Dirt: In Management Areas 5.13, late successional habitats should be provided and well distributed so that individuals of species requiring those habitats can interact with others in the planning area.*

Again, during the project analysis process, design criterion 15 was incorporated into the Proposed Action – Modified to reduce actions within late succession forests to those necessary to reduce threats to public safety. This criterion reads as follows:

“This design criterion applies to the following Geographic Areas on the Routt National Forest: Arapahoe Creek, Corral Peaks, Encampment River, Owl Mountain, Pinkham Mountain, Willow Creek, Little Snake, Sand Mountain, Slater Creek, Upper Elk River, Gore and Red Dirt. In MA 5.13, dead and dying trees will be hand felled and left in place on 35 percent of the total treatment area of the LP and SF stands with trees of larger diameter (trees mostly > 9" dbh). If necessary, fallen trees may be stabilized to prevent movement onto a roadway. These areas of “hand fall and leave in place” can be located mostly within SF stands where there will be more residual green timber after hazard tree removal and/or combined with wildlife connectivity needs. Lop and scatter slash to a height of less than 24 inches above ground. Do not designate landings in these areas. Trees will be felled adjacent (or on top of each other) to each other wherever possible to reduce movement impacts to elk.”

The above design criteria provide adequate protection to protect old growth and late succession forests and meet the intent of the direction contained in both the Routt and the Medicine Bow Revised Forest Plans.

Project Record:

EA page 17

EA pages 54 - 56

Issue 7: Hydrology

7a: Water Supplies

Comment 1	“Your Proposed Action should include plans to protect the quality and quantity of water supplies generated within the Forest, specifically those areas that generate water supplies for the City of Cheyenne (the Crow Creek watershed area located within the Pole Mountain area, the watersheds above Lake Owen, Rob Roy Reservoir, Hog Park Reservoir, and the watershed area above Cheyenne’s water collection system located along the west side of the continental divide within the Little Snake River Drainage Basin).”
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Letter Number(s): 3

Response: *Project design criteria have been included to minimize the potential impacts to community water supplies and the potential effects to community water supplies have been address in the EA and Watershed Specialist report.*

The purpose of this project is to reduce the existing, potentially hazardous, standing and dying trees which are developing along open National Forest System Roads, developed recreation sites, and administrative sites to meet the need for public safety, reducing fuel hazards, and visual quality. Treatment of additional watershed areas for protection of water supplies is beyond the scope of this proposal and would be better addressed through separate site-specific project analysis. Implementation of this project is intended to reduce the risk from hazard trees and therefore improve public safety along open National Forest System Roads, which are used for access to much of the municipal water infrastructure on the Forest. National Forest System Roads which are closed to public motorized travel (Maintenance Level 1) generally receive less public use and therefore were

determined to be lower public safety risk than open roads and therefore such actions are beyond the scope of this initial proposal. Closed roads where public safety risk may be high would be better addressed through separate site-specific project analysis if the existing land use authorizations does not provide adequate means to address hazard trees on these granted rights of ways.

Project Record:

EA – Water Resources – Affected Environment and Environmental Consequences (pages 38 – 41)
Watershed Specialist Report

7b: Cumulative Hydrologic Impact Assessment (CHIA)

Comment 1	“The EIS should include a CHIA due to the past impacts to public water supplies and high quality streams in the watershed where further hazard tree removal and fuel reduction activities are proposed. The Council on Environmental Quality (CEQ) and the U.S. Environmental Protection Agency (EPA) have established guidelines for the analysis of cumulative impacts including the appropriate use of the CHIA in circumstances where the scope, extent, and history of water resource degradation warrants such detailed investigation.”
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Letter Number(s): 16

Response: *Project design criteria have been included to minimize the potential impacts to community water supplies, high quality streams and other water resources. The potential cumulative effects to community water supplies, high quality streams and other water resources and have been address in the EA and Watershed Specialist report.*

Project Record:

EA – Water Resources – Affected Environment and Environmental Consequences (pages 38 – 41)
Watershed Specialist Report

Issue 8: Project Implementation

8a: Contracts

Comment 1	“We request that local contractors be given preference in performing work to reduce these public safety hazards. Please allow for multiple small contracts rather than a few large ones so that small local businesses can consider bidding on this work.”
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Letter Number(s): 5

Response: *Since removal or just felling of hazard trees will be scattered across two Forests, it is anticipated that many separate projects of various size, will be needed to complete the work.*

Stewardship contracting authority allows the Forest Service to award contracts on a “best value” basis. Under best value, the Forest Service can select contractors based on selection criteria that

dose not rely solely of price. Under stewardship contracting, selection of local contractors is one of the selection criteria.

Project Record:

EA, Appendix B

Comment 2	“The felling and removal of all dead and dying hazard trees along the roads and trails as specified above (1b #10) should be accomplished, if at all possible, using stewardship agreements whereby the dead and dying hazard tree removal would be considered service work that is paid for by the value of the products being removed from NFS lands. The costs of the service work for removal of the dead and dying hazard trees can be offset by the value of the forest products removed until those forest products totally lose their value over time because of the degradation of the timber resources. At that time, the FS should pay operators/contractors to have this service work accomplished to reduce fuel hazard and increase public safety.”
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Letter Number(s): 10, 31

Response: *Public Law 108-7, section 323, June 27, 2003, grants the Forest Service authority to enter into stewardship contracts and agreements. This is a valuable tool designed for just such situations where standard timber sale or service contracting authorities may not accomplish all the work on the ground that has been identified. It is anticipated that stewardship authorities will be used extensively.*

If the initial timber appraisal indicates that the removal cost of hazard tree treatments is greater than the value of the trees, the Forest Service has three tools that it can use to implement the project. The first is free use authorities that allow the Forest Service to give away hazard trees to contractors or individuals who may be willing to perform the work at no cost to the Forest Service. If there is no party interested in free use, the Forest Service can hire contractors using service contract authorities to have the hazard trees removed. If the cost of the service contract is too high or there are no contractors interested in performing the work, the Forest Service can use its personnel to perform the work.

Commercial timber sale contracts, non-commercial service contracts, free use permits and contracts, Forest Service “Force Account” projects, and Stewardship contracts could be used to fell and/or remove the hazardous trees. Appendix B of the EA contains a description of the various permit/contract types.

Project Record:

EA, Appendix B

Comment 3	<p>“When considering contracts, bear the following in mind:</p> <ol style="list-style-type: none"> 1) Small contracts work better than large ones 2) Be realistic regarding market conditions 3) Blue-stain logs are difficult to merchandise at this time 4) Make sure the terms you offer regarding removal of hazardous trees are available to existing contractors. <p>Do not offer free firewood without permits, as people could mistakenly be attracted to contractor’s log decks.”</p>
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Letter Number(s): 36

Response: *Under “Best Value” selection criteria, the competence of the contractor is considered. The Forest Service is able to select the contractor that offers the best results and not necessarily the lowest price.*

Forest Service timber sale appraisals track current market conditions and design contracts accordingly. The product that is sold is appraised using Forest Service direction that takes into account many factors, one of which is the decreased value of bluestained sawtimber. Timber value is a concern but if there is no commercial market, the Forest Service may have to pay a contractor under a service contract. Contract requirements are designed with local contractors in mind.

Free use authorities require a signed permit or contract be issued to the person or organization removing the product. A map of the free use area is part of the permit or contract and the person or organization issued the permit or contract can only operate in the permit area identified on the map. Appendix B contains a description of the various permit/contract types.

Project Record:

EA, Appendix B

8b: Potential Contractors

Comment 1	<p>“Potential falling contractors who will work in remote areas: Don Read, P.O. Box 881005, Steamboat Spgs, CO 80488 Don Kosnik, P.O. Box 772905, Steamboat Spgs, CO 80477”</p>
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Letter Number(s): 15, 30

Response: *Thank you for your interest in the proposal.*

Project Record:

8c: Quality of Work

Comment 1	<p>“In organizing resulting contracts, please distinguish between the quality of work that you require. For instance, you may require finer clean-up in campground areas than along trails or smaller footprints of equipment in administrative areas than along roads.”</p>
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Letter Number(s): 15, 30

Response: *Design criteria pertaining to slash disposal have been developed and will be implemented when timber removal contracts are issued.*

Project Record:

EA pages 16 - 19

8d: Slash Treatment

Comment 1	“Treating such a large area would generate large amounts of slash. How would this material be treated? It would not be wise to just leave it, as it could easily be ignited. Slash disposal methods proposed in the Oct. 19 scoping document are not feasible and would be too costly to implement. Small amounts of slash of all sizes should be retained on site to provide erosion control, retain moisture, provide small animal habitat, and to decay into new soil.”
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Letter Number(s): 1, 13, 16, 23

Comment 2	“Wherever possible, allow for a variety of slash treatment alternatives rather than requiring one alternative. The variety could include chipping, piling, and piling and burning by the contractor.”
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Letter Number(s): 5

Response: *A variety of different slash treatment methods are allowed depending upon the situation. Reference the Design Criteria, Slash Disposal/Fuel Treatments. It is rare that contractor or purchaser burning is allowed as the Forest Service has strict requirements pertaining to burn plan preparation and burn personnel qualifications that timber contractors rarely possess. Any burning is usually completed by the Forest Service.*

Project Record:

EA pages 16 - 19

Comment 3	“Can the FS provide a place for the public to take felled trees and slash when the FS is working around privately owned areas?”
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Letter Number(s): 28

Response: *Establishment of areas for the public to take felled trees and slash is beyond the scope of this analysis.*

Project Record:

N/A

8e: Firewood

Comment 1	“I understand the need to make these roads safer by removing dead trees, but I am concerned that putting these areas up for commercial harvest will make it very difficult for the general public to find anywhere they will be allowed to cut firewood along roads.”
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Letter Number(s): 2

Response: *The Proposed Action – Modified proposes to fell and/or remove hazardous trees within 150 feet of the centerline of roads and trails. In some areas, trees may only be felled but not removed. Given the wide-spread nature of the beetle epidemic, it is unlikely that there will be any difficulty in finding firewood. Further, it is likely that there will be areas where a timber appraisal indicates that removal of the material is more costly than the value of the material. In these cases, the Forest Service may facilitate the completion of the work by issuing free use permits or contracts. These permits or contracts will be issued using authorities regulating free use to individuals or organizations, or as administrative free use. Free use permits will not allow the permittee to sell the product removed; administrative free use contracts allow the resale of the product removed. The permittee or contractor will be required to perform the work and will be given the trees free of charge.*

Project Record:

EA Appendix B

8f: Re-planting

Comment 1	“Plans for re-planting of lodgepole pines and other conifers should be included in the proposal.”
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Letter Number(s): 1, 13, 16, 23

Response: *Lodgepole pine is a shade intolerant species that generally requires full sunlight in order to reproduce; it generally reproduces naturally in these situations. Consequently, it is unlikely that that planting along roads and trails would be necessary. Planting may be required in some of the developed recreation areas. In these situations, a vegetation management plan would be developed and implemented.*

Project Record:

N/A

8g: Timber Harvest Adjacent to Private Land

Comment 1	“Remove hazard trees only within 300 feet of private land and clearcut beyond the 300 foot limitation.”
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Letter Number(s): 29

Response: *The Proposed Action – Modified was developed to reduce hazards to public health and safety by felling and/or removing dead and dying trees along roads and trails and in and adjacent to developed recreation and administrative sites. While we recognize the importance of removing hazardous trees adjacent to private land and throughout the landscape to reduce catastrophic wildfire potential, such actions are beyond the scope of this proposal. Given the qualitatively different nature of the two types of proposals, we believe that each would be better addressed through separate site-specific project level analyses. As such, in addition to the Hazardous Tree Removal project, the Forest is also working on several larger projects that address fuels treatments adjacent to WUI (Wildland Urban Interface) areas, private in-holdings, and other values at risk. Some examples of these projects include the Ryan Park Hazardous Fuels, White Rocks Estates Fuels, Battle Hazardous Fuels, Fox Park, Rainbow Valley, Seedhouse, Gore Lakes Communities, Red Dirt Communities, Steamboat Springs, Spruce Gulch, and Stagecoach.*

Project Record:

EA pages 15 and 16

Issue 9: Wildlife

9a: Interior Species/Habitat Fragmentation

Comment 1

“This project, in conjunction with other proposed large-scale timber sale projects, will have major impacts on the viability of interior forest species and will cause massive fragmentation.”

Letter Number(s): 16

Response: *The Forest Service is accountable for sustainable management of natural resources under the National Forest Management Act (NFMA). 36CFR, 219.19 that requires that USDA FS manage National Forest in a manner that provides sufficient habitat to sustain all indigenous wildlife across a planning area. Biological Assessments, Biological Evaluations, and Management Indicator Species reports have been completed that address project effects to proposed, threatened, endangered and management indicator species. These reports reflect the risks to wildlife population viability across the planning area. Project Design Criteria are built into the project insure species viability.*

Existing habitat and ecosystems will be fragmented from the proposed project but are also fragmented from naturally occurring events; such as succession, wildfire, insect infestations, blow down etc. The remaining forested (and project area) area will be managed to allow for a diverse range of ecosystems and habitats so that species viability is maintained (as mandated through NFMA).

Project Record:

EA pages 56 - 63

Biological Evaluation – Routt National Forest
Biological Evaluation – Medicine Bow National Forest
Management Indicator Assessment – Routt National Forest
Management Indicator Assessment – Medicine Bow National Forest
Biological Assessment – Routt National Forest
Biological Assessment – Medicine Bow National Forest

9b: Edge Effect

Comment 1	“The potential to remove 336,600,000,000 cubic feet of wildlife habitat creates ecological problems known as edge effect. Forests naturally feather into a succession of habitat types rather than abruptly ending in a hard edged row of trees. The Forest proposal to cut corridors deep into the MBNF will greatly exacerbate the edge effect.”
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Letter Number(s): 16

Response: *The intent of the Proposed Action - Modified is not to leave a “hard edged row of trees” but to selectively remove trees as defined in the scoping letter. Several references are made as to the scope of the trees to be removed. They are: 1) “standing dead and dying trees that are within 1 ½ tree heights (up to 150 feet²) from the centerline of: 1) state and county roads that cross the Forest; and 2) Forest Service system roads open to public travel (Maintenance levels 2 – 5) would be felled and/or removed. Healthy, stable, live trees or trees leaning away from the roads would be retained. This statement indicates a variety of trees in a variety of conditions will be retained; and 2) The October 19, 2007 scoping letter states “The majority of the treatments would impact lodgepole pine trees, although small amounts of Engelmann spruce, sub-alpine fir, and aspen could also be felled and/or removed. Depending on the severity of the infestation and the resultant mortality, harvest treatments could include clearcutting, patch clearcutting, overstory removal, thinning, and group selection. This statement identifies that there will be a variety of species removed through a variety of methods. The removal of interspersed trees, the variety of the trees to be removed, and the method of which the trees will be removed will minimize the edge effect as referenced in the Response to Comments, Comment 1 Edge Effect. The fact that the diversity in species are interspersed throughout the forests and will be removed through a variety of methods indicates that the forest will naturally succeed with an edge feather habitat as compared to a “hard edged row of trees.” Design criteria (#’s. 17, 27, 32, 37) will also be applied to protect sensitive areas and optimize habitat conditions.*

Project Record:

EA pages 16 – 19

EA pages 56 – 63

Biological Evaluation – Routt National Forest

Biological Evaluation – Medicine Bow National Forest

Management Indicator Assessment – Routt National Forest

Management Indicator Assessment – Medicine Bow National Forest

Biological Assessment – Routt National Forest

² The June 2007 Scoping document indicated 200 feet from the centerline of roads.

9c: Hiding Cover

Comment 1	<p>“With no hiding cover along roads, the movement of deer and elk would also be adversely affected. Guidelines requiring a habitat effectiveness level of 50% (MA 5.13, FP and 2-46) and 60% (MA 5.11 at 2-41) might not be met.</p> <p>Creating the large deforested swath along many miles of roads would also hinder efforts to keep motor vehicles on designated routes. The newly opened areas would invite use by motorcycles, ATVs, and snowmobiles. This would further increase the adverse impacts on wildlife.”</p>
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Letter Number(s): 23

Response: *Elk use within the analysis area occurs primarily in the spring, summer, and fall, with some use of south facing slopes at lower elevations as winter range during milder winters. Two primary components of effectiveness of elk habitat are hiding cover and road density. Hiding and escape cover provide security or a means of escape from the threat of predators or harassment (Skovlin 1982). Currently most Geographic Areas on the Medicine Bow and Routt National Forests are above herd objectives for deer and elk.*

The Forest Plan defines hiding cover as structural stages of vegetation (boles and foliage) capable of hiding 90% of a standing adult elk from human view at a distance equal to or less than 200 feet. Road density is simply the total miles of road per square mile. Because road density affects how elk will utilize potential habitat, it is used along with hiding cover as indices to measure elk habitat effectiveness. Habitat effectiveness is defined as the percent of usable habitat during the non-hunting season (USDA Forest Service 1998a). As road densities approach one mile per square mile in optimal elk habitat, potential elk habitat effectiveness will drop from 100% to 60%. The Forest Plan requires that habitat effectiveness for deer and elk be maintained at 50% or greater, as measured at the geographic area scale; 60% or greater in ‘5.11 General Forest and Rangeland’ prescription areas; and 70% or greater in ‘5.41 Deer and Elk winter range’ prescription areas. The current elk habitat effectiveness model is not designed to account for the effects of closed roads, so only open road and motorized trail densities were used to generate values. Several research studies have qualitatively demonstrated the negative effects of closed roads upon elk habitat effectiveness (Leege 1984; Bumstead 1975; Ward et.al. 1973). Closed roads are used by many recreational hikers, bicyclists, hunters, and for occasional administrative use.

Project Record:

EA pages 56 – 63

Biological Evaluation – Routt National Forest

Biological Evaluation – Medicine Bow National Forest

Management Indicator Assessment – Routt National Forest

Management Indicator Assessment – Medicine Bow National Forest

Biological Assessment – Routt National Forest

Biological Assessment – Medicine Bow National Forest

Issue 10: Fisheries

10a: Fish Habitat

Comment 1	“Felled trees could provide a higher level of woody debris in the stream channel, thus increasing fish habitat. Felled trees could also be used to construct instream habitat structures. Contact Christina Barrineau (Laramie Region Aquatic Habitat Biologist) at 755-5180.”
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Letter Number(s): 32

Response: *With the exception of debris piles and dead trees that are located within 150 feet (upstream) of culverts and road crossings that intersect perennial and intermittent streams, large woody debris will remain within the flood-prone area of tie-driven streams (design criterion # 8); streams that have been tie driven are the ones most likely to benefit (fish habitats) from the recruitment of large, woody debris. The abundance of large, woody debris due to beetle kill that falls within the flood-prone area will be naturally recruited into stream channels to create aquatic habitats (e.g. pools). Storage of large wood salvaged from beetle-killed trees to be used for fish-habitat improvements may be problematic because of the accelerated deterioration rates associated with ground storage prior to use (Lewis and Hartley 2006).*

Project Record:

Lewis, K.J. and I.D. Hartley. 2006. Rate of deterioration, degrade, and fall of trees killed by mountain pine beetle. BC Journal of Ecosystems and Management 7(2): 11-19. URL: http://www.forrex.org/publications/jem/ISS35/vol17_no2_art2.pdf.