

Stephen O. Ellis
December 14, 1982

LETTER L-4

Page 2

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3. New livestock water sources such as wells, reservoirs, or catchment basins are approved, constructed, and maintained subject to Colorado Water Statutes.] 6
4. The quality of water originating on Forest Service land does not diminish. (The management plan indicates all the alternatives meet this objective).] 7
5. The increased sediment transport due to increased water yield does not damage existing reservoirs.] 8
6. No storage reservoirs are constructed over 10 feet high without our office's approval of the plans. Livestock watering reservoirs must be approved by our office if their embankments are over five feet in height.] 9
7. The Forest Service tells potential buyers and leasors of forest land that they will be subject to applicable water statutes.] 10
8. Road closures do not reduce access to existing diversion structures. Access is needed for maintenance and inspection of the structures.] 11
9. Silvicultural practices and other management practices do not reduce the historic flow in late summer.] 12

- 6 Water used for recreation be appropriated under
- 7 Forest standards and quality standards will
- 8 Sediment threshold for reservoirs should not
- 9 The Forest Plan provisions See Forest Plan, Chapter
10. See response to number
- 11 No response necessary
12. No response necessary

VI-1196
/JRH:ma

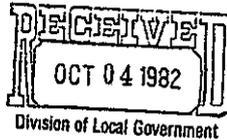


LETTER L-5

COLORADO
HISTORICAL
SOCIETY

The Colorado Heritage Center 1300 Broadway Denver, Colorado 80203

September 29, 1982



FOREST SERVICE RESPONSE

Mr. Stephen O. Ellis
Principal Planner
A-95 Clearinghouse
523 State Centennial Building
1313 Sherman Street
Denver, Colorado 80203

RE: Sangre De Cristo, Spanish Peaks, Greenhorn Mountain and
Buffalo Peaks Wilderness Study Area Reports

Dear Mr. Ellis:

VI-200

The designation of land as a wilderness area on the one hand restricts access to the land by the use of motorized vehicles and restricts land disturbing activities, but on the other hand probably increases visitor use. The possibility exists that vandalism of cultural resources could intensify due to the greater visitor use.

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There appear to be few known cultural resources within these study areas. This office suggests that the Forest Service identify the cultural resources within the areas of known visitor use and provide for a monitor to periodically check these resources. In the event that vandalism increases, a mitigation plan would then be formulated in consultation with this office to address the impacts to any eligible resources.

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All areas where there will be any land disturbing activities should be surveyed to identify eligible cultural resources prior to the construction work.

3

If this office can be of further assistance, please contact the Compliance Division at 866-3392.

Sincerely,

Arthur C. Townsend
State Historic Preservation Officer

- 1 We agree, significant vandalism and/or disturbance of cultural resources may increase because of increased visitor use following wilderness designation. Management requirements in the Forest Plan provide protection for these resource values. In Wilderness areas the following management requirement will be implemented, "Do not provide interpretive facilities at cultural resource sites, nor restore or enhance cultural resources for recreation purposes." See Forest Direction and Management Area Prescriptions 8B and 8C, Chapter III, Forest Plan
- 2 Known cultural resources in wilderness and non-wilderness areas will be monitored under management requirements displayed in the Forest Plan, Chapter IV, Monitoring and Evaluation
- 3 Cultural resource surveys are conducted prior to ground disturbance for all Forest project activities. When significant cultural or scientific value warrants development, cultural discoveries are developed. When significant cultural resources (sites) cannot be avoided by a given project, these sites are evaluated and excavated if necessary. Costs are shared by the taxpayer and resource user. For most identified cultural resource sites, confidentiality is the most cost-effective way to protect sites.

Management requirements in the Forest Plan, Chapter III, Management Direction provide for protection of cultural resources in wilderness and non-wilderness areas. See Management Activity A02 (Cultural Resource Management) and B02 (Wilderness Area Management)



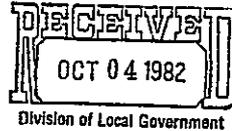
LETTER L-6

**COLORADO
HISTORICAL
SOCIETY**

The Colorado Heritage Center 1300 Broadway Denver, Colorado 80203

September 28, 1982

Mr. Stephen O. Ellis
Principal Planner
A-95 Clearinghouse
523 Centennial Building
1313 Sherman Street
Denver, Colorado 80203



RE: DEIS Pike and San Isabel National Forests; Comanche and Cimarron National Grasslands.

Dear Mr. Ellis:

This office prefers that the Forest Service choose one of the alternatives listed in the above document that will best preserve cultural resources. It has been determined that the recognition of cultural resources does not necessarily preserve them but elevates the chance for vandalism. If the Forest Service increases the productivity of an area, the responsibility for protecting cultural resources also increases. Official determinations of eligibility would need to be completed for all cultural resources identified to insure that the most important sites are protected. The Forest Service would also need to be prepared to monitor and police the locations of the eligible cultural resources to prevent vandalism. Should vandalism occur, a plan would need to be prepared to mitigate this adverse effect.

This office is concerned that cultural resources be adequately protected and, from all appearances, protection is not adequate at the present time. The Forest Service must consider protection measures in light of their plans to increase production as stated in alternatives A, C, & D.

We commend the Forest Service for its desire to increase the opportunity to interpret and manage cultural resources for visitors and scientific study. As these plans are formulated this office requests the opportunity to review them.

As a point of information, the National Register of Historic Places eligibility criteria and nomination procedures are set forth in 36 CFR 60, while the procedures for seeking a determination of eligibility are described in 36 CFR 63. The Advisory Council on Historic Preservation procedures (36 CFR 800, referenced on

VI-201

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- 1 Intensive cultural resource surveys are made prior to any resource development activity involving ground disturbance. This provides the best opportunity to identify and protect cultural resources.
- 2 Management requirements in the Forest Plan, Chapter III, Management Direction provide for identification, interpretation, and protection of cultural resources as well as a nominating procedure for inclusion in the National Register of Historic Places. See Management Activity A02 (Cultural Resources Management), Chapter III, Forest Plan.
- 3. See response to comment 2, letter L-5
- 4 See response to comment 3, letter L-5
- 5. The statement in the Draft EIS was in error and has been corrected

FOREST SERVICE RESPONSE

LETTER L-6 continued

Mr. Stephen O. Ellis
September 28, 1982
Page Two

FOREST SERVICE RESPONSE

page 223 of the DEIS) enumerate the general steps to be followed to achieve adequate consideration of cultural resources.

If this office can be of further assistance, please contact the Compliance Division at 866-3392.

Sincerely,



Arthur C. Townsend
State Historic Preservation Officer

ACT/WJG:ss

No response necessary.

VI-202

STATE OF COLORADO

DEPARTMENT OF HIGHWAYS

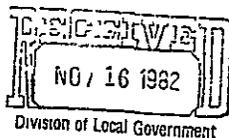
4201 East Arkansas Ave
Denver Colorado 80222
(303) 757-9011



FOREST SERVICE RESPONSE

November 10, 1982

Mr. Stephen O. Ellis
State Clearinghouse
520 State Centennial Building
1313 Sherman Street
Denver, Colorado 80203



Dear Mr. Ellis.

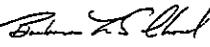
The Colorado Department of Highways has completed its review of the Draft Environmental Impact Statement and Land Management Plan for the Sangre de Cristo, Greenhorn Mountain, Buffalo Peaks, and Spanish Peaks Wilderness Study Areas and has no comments

Thank you for the opportunity to review these documents.

No response necessary

Very truly yours,

Harvey R. Atchison
Director
Division of Transportation Planning

By 
Barbara L.S. Chocoi
Manager
Project Development Branch

REG/rg

VI-203

LETTER L-7 continued

STATE OF COLORADO

DEPARTMENT OF HIGHWAYS

4201 East Arkansas Ave
Denver Colorado 80222
(303) 757-9011



FOREST SERVICE RESPONSE

November 10, 1982



Mr. Stephen O Ellis
State Clearinghouse
520 State Centennial Building
1313 Sherman Street
Denver, Colorado 80203

Dear Mr. Ellis:

The Colorado Department of Highways has completed its review of the Draft Environmental Impact Statement and Land and Resource Management Plan for the Comanche and Cimarron National Grasslands and has no comments.

No response necessary

Thank you for the opportunity to review these documents.

Very truly yours,

Harvey R. Atchison
Director
Division of Transportation Planning

By 
Barbara L.S. Chocoi
Manager
Project Development Branch

REG/rg

VI-204

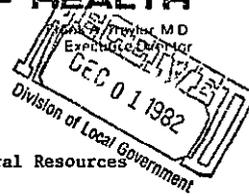


LETTER L-8

COLORADO DEPARTMENT OF HEALTH

Richard D Lamm
Governor

MEMORANDUM



FOREST SERVICE RESPONSE

TO: Colorado Clearinghouse and Department of Natural Resources
FROM: Air Pollution Control Division
RE: EIS #82-118. Pike and San Isabel National Forests; Comanche and Cimarron National Grasslands
DATE: November 30, 1982

VI-205

The Air Pollution Control Division has reviewed the above referenced document, and we cannot find (1) any discussion of existing air quality, (2) an identification of air quality implications of several major Forest Service activities being proposed, such as those from issuing ski area permits, increasing the output of timber production for meeting firewood demand in Colorado's Front Range, and increased controlled burning; nor (3) an identification of the role of the Forest Service in air quality management, and how that role relates to the State Implementation Plan. An adequate EIS would have to address these items, as a minimum.

1

1 The Final EIS and the Forest Plan have been revised to include discussions of the role of the Forest Service and the State in air quality management, identification of major sources of air pollution from Forest activities, and existing air quality. See the section PROTECTION, Chapter III, in the EIS and the section FOREST PROTECTION, Chapter II, in the Forest Plan

Attached is the air quality discussion taken from another Forest Service Plan prepared earlier this year for the Arapaho and Roosevelt National Forests. It can serve as an example in that it addresses some of the major elements required by NEPA. Also attached is an excerpt taken from Colorado's recently submitted SIP regarding the conformity of federal actions required by the Clean Air Act. These two attachments should be useful in assisting the Forest Service to write a section on air quality for the final EIS.

2

2 These two attachments, the air quality discussion excerpted from the Draft Environmental Impact Statement for the Arapaho and Roosevelt National Forests' Plan and the excerpt from the State of Colorado document regarding the conformity of federal actions required by the Clean Air Act have been reviewed and were helpful in the preparation of this EIS

If you have any questions or require assistance, please call Karin Ostlund of the Air Pollution Control Division at 320-4180.

KO/skt
ATTACH. (2)
cc. Paul Nazaryk,
Office of Health Protection

Air Quality

Air quality over most of the Forest is believed to be good with respect to the six pollutants monitored by the Environmental Protection Agency (carbon monoxide, photochemical oxidants, sulfur dioxide, nitrogen dioxide, lead, and total suspended particulates).

The largest source of air pollution from Forest activities is smoke from fires (both wildfires and prescribed fires) and fugitive dust from unpaved Forest roads.

The Clean Air Act and its 1977 amendments give the states most of the responsibility for managing air quality within their boundaries. The framework for air quality management is the state implementation plan (endnote 24).

The state has identified two air quality problem areas just east of the Forest. These are the Metro Denver Air Quality Maintenance Area in Boulder, Denver, Jefferson, and portions of Adams, Arapahoe, and Douglas counties, and the Longs Peak Air Quality Maintenance Area in eastern Larimer and western Weld counties. The baseline air quality and expected growth in these areas were the basis for their designation. These areas must meet specific air quality regulations that are different from those for the rest of the state.

The Forest's role in air quality management is to coordinate Forest activities with state and federal air quality control efforts. This is accomplished by properly managing the air pollution created by Forest Service activities such as prescribed fire, construction and use of roads, and the operation of various facilities. It also includes review of ski area permit applications for potential air quality impacts from fireplace smoke and automobile exhaust. The Forest has responsibility for protecting Forest lands from adverse impacts created by external sources of air pollution such as industrial plants and automobiles.

Some air quality problems are imposed on the Forest from the population centers along the Front Range. However the actual potential for long-term degradation of Forest air quality is low because the Forest is generally upwind and upslope from major population centers. Potential point sources of air pollution upwind (north and west) of the Forest are legally restrained from adversely affecting the Forest air quality-related values.

The Rawah Wilderness is designated as a Class I air quality area by the Federal Clean Air Act. This means that air quality in this area may only be minimally degraded from its present levels by activities within or outside the area. The rest of the Forest, including the Indian Peaks Wilderness and the wildernesses established in 1980 in the Colorado Wilderness Act, is a Class II air quality area which allows moderate degradation over baseline concentrations of sulphur dioxides and particulates.

The Forest manages air quality in wilderness areas to prevent adverse impacts to wilderness values. Such management includes reviews and recommendations on new source emitting facilities to ensure compliance with the Federal "prevention of significant deterioration" permit program. Color photographs were taken from key vistas within the Rawah Wilderness during the summer of 1979 to record benchmark visibility. These photographs are kept as a permanent record. The same views will be photographed periodically to evaluate and record any changes.

The Forest complies with the agricultural burning application and permit requirements of the Air Pollution Control Division, Colorado Department of Health.

Temporary air degradation does occur but does not exceed air quality regulations for the following reasons:

- o Fire is an essential component of the ecosystem to which prescribed fire is applied, and the emissions produced from burning are natural components of the environment in which they occur.
- o Prescribed fire is used as a tool to dispose of forest residues and to achieve many other forest and range management objectives when other viable alternatives are limited.

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Enclosure to Letter L-8

- (c) In the interim, reasonable further progress.
- (d) A comprehensive, accurate, current inventory of actual emissions from all sources.
- (e) Identification and quantification of emissions allowed from major new sources.
- (f) Require permits for construction and operation of new or modified sources in accordance with section 173
- (g) Identify and commit financial and manpower resources necessary to carry out the plan.
- (h) Emission limitations, schedules of compliance and other measures necessary to meet requirements of this section.
- (i) Evidence of public, local government and State legislative involvement with regard to the analyses of air quality, health, welfare, economic, energy and social effects of the plan provisions.
- (j) Written evidence of formal adoption of all necessary requirements by the State, general purpose local governments, or a regional agency designated by local governments for such purpose.
- (k) In the case of those areas that cannot meet the standards by December 31, 1982 despite implementation of all reasonably available measures, the plan must also include
 - 1) a permit requirement for construction or modification of major emitting facilities that includes an analysis of alternative sites, sizes, production, processes and environmental control techniques which demonstrates that benefit from the source significantly outweighs the environmental and social costs imposed as a result of the construction or modification.
 - 2) an inspection and maintenance program.
 - 3) other measures necessary to meet the standards.

VI-207

II.B.3. ENSURING CONFORMITY OF FEDERAL ACTIONS

Another section in the Clean Air Act, 176 (c), recognizes that federal actions can affect the successful implementation of a State's plan. Accordingly, this section requires that a conformity determination be made by any federal agency that proposes an action which would either directly or indirectly affect air quality.

Unfortunately, the language of 176 (c) is extremely vague both in terms of the criteria to be used in making such a determination, and in terms of the respective roles of states and federal agencies in assessing the adequacy of that determination. EPA has issued guidance documents in an attempt to clarify these issues (Federal Registers 4-1-80 and 1-22-81), but most of the substantive guidance has remained in draft form.

One proposal was to require each State to revise its SIP by establishing its own criteria and procedures to help assure the conformity of federal actions. Its intent was clearly to give States a voice in determining what criteria should be applied by federal agencies, and to enable States to judge whether those criteria were being applied appropriately in specific instances. Another document had specified that eight criteria be used on an interim basis by all federal agencies in making their determinations of conformity. Unfortunately, this guidance isn't binding because final rulemaking has not taken place.

Enclosure to Letter L-8

176 (c) does remain a part of the Clean Air Act, however, and federal agencies must therefore demonstrate that their proposed actions are consistent with a State's plan. The State can assist federal agencies by documenting criteria it has applied to proposals in the past, and will likely apply in the foreseeable future. The discussion that follows thus serves to clarify the State's expectations regarding a conformity determination.

Through its language, section 176(c) encompasses a broad range of federal activities; however, the Air Pollution Control Division is interested primarily in those that potentially affect the assumptions used in the Colorado SIP, and in those which might interfere with the successful implementation of the Colorado SIP. Whenever these types of activities are proposed by a federal agency, a number of criteria should be applied in order to make an adequate conformity determination.

The Division suggests that six findings be made by the proposing agency for an action to be considered "in conformance with the Colorado SIP." However, not all of these findings are applicable to all federal actions, in some cases, the assessment could be considered "adequate" if only two of the criteria are met.

What follows, then, is a) the list of all six findings which would demonstrate that a proposal conforms to the SIP, b) an indication of the types of activities that would require a conformity determination, and c) an indication of the criteria that would be applied in evaluating each proposal.

Findings Necessary in Demonstrating Conformity to the Colorado SIP

1. All required state and federal air quality permits have been obtained, or air quality assessments have been made which show that such permits can be obtained in the future.
2. All population projections provided in the supporting data base for the action are consistent with the population projections used in the SIP.
3. All traffic volumes and speeds provided in the supporting data base for the action are consistent with the traffic volumes and speeds used in the SIP.
4. The increased emissions resulting from the action do not exceed the area's increment for the prevention of significant deterioration of air quality.
5. The increased emissions resulting from the action do not contribute to the violation of any NAAQS nor delay attainment of any NAAQS.
6. The action is consistent with all the control measures that are provided for in the SIP.

Types of Actions Requiring a Determination of Conformity

The types of actions that are likely to be subject to 176 (c) generally fall into one of two general categories proposed rules, waivers, or other

administrative actions which will affect certain basic assumptions (e.g. emission assumptions) used in the SIP, or proposed projects that can affect either the population assumptions or the transportation assumptions used in the SIP. What follows is a description of each of these categories, and an identification of the findings that should be made for each type.

a. Rules/Waivers/Other Administrative Actions

Attainment of the carbonmonoxide standard is predicted on the assumption that the Clean Air Act, the National Ambient Air Quality Standards (NAAQS) and the Federal Motor Vehicle Emissions Control Program (FMVECP) would remain unchanged. The FMVECP is particularly essential in demonstrating attainment, and it therefore follows that that any federal action to weaken requirements or to grant waivers of existing emission standards may have a deleterious effect on Colorado's ability to implement its SIP.

Because EPA is the federal agency empowered to propose changes to ambient air quality standards, stack or tailpipe emission standards, and standards regulating the composition of such products as gasoline, it would appear that a number of EPA proposals should be evaluated in accordance with 176(c). Accordingly the State requests that EPA include a conformity determination whenever it publishes a notice of request to waive standards or proposes rules that might otherwise affect the successful implementation of Colorado's SIP. The following findings would constitute an adequate conformity determination:

- o The increased emissions resulting from the action do not contribute to the violation of any NAAQS nor delay attainment of any NAAQS. (Finding #5)
- o The action is consistent with all the control measures that are provided for in the SIP. (Finding #6)

VI-208

In addition to these two basic findings, it is possible that a proposal might affect TSP or SO₂ in attainment areas of the State. In the event that this occurs, finding #4 would also apply.

Actions having air quality effects, but proposed by federal agencies other than EPA, will typically fall into one of the following two "project" categories:

b. Projects that are population related

Projects either servng future population (e.g. subdivisions, water supply facilities, sewage treatment facilities) or generating future population (e.g. permits for destination ski areas), would require that the following findings be made:

- o For projects affecting non-attainment areas, consistent population projections (#2), control measure implementation (#6), and possibly findings #1 and #5 should be made. #5 must be made only if the project produces emissions which are unaccounted for in the SIP, or if the activity is projected to take place in years beyond those accounted for in the SIP, e.g. a project whose completion date is 2010. Finding #1 is required only if the activity requires a permit.

- o For projects affecting attainment areas, assurance must be made that the PSD increment will not be exceeded (#4), and that the NAAQS will not be violated (#5). Finding #1 is required only if the activity requires a permit.

c. Projects that are transportation related

Transportation projects (e.g. highway-widening) or transportation-generating projects (e.g. airports, military installations), would require that the following findings be made:

- o For projects affecting non-attainment areas, consistent traffic projections (#3), control measure implementation (#6), and possibly findings #1 and #5 should be made. #5 must be made if the project is proposed to take place for years beyond those accounted for in the SIP, or if the project produces emissions that were otherwise not accounted for in the SIP. #1 is required only if the activity requires a permit.
- o For projects affecting attainment areas, a finding must be made that the PSD increment will not be exceeded (#4) and that the NAAQS will not be violated (#5). Finding #1 is required only if the activity requires a permit.

The chart below summarizes the preceding discussion. It may be useful to any federal agency contemplating a rule change, waiver, or the preparation of an Environmental Impact Statement or Environmental Assessment.

Federal action	a. RULE/WAIVER	b. PROJECT		c. PROJECT	
		Population related	Non-attainment area	Transportation related	Attainment area
Colorado Location.	Statewide	Non-attainment area	Attainment area	Non-attainment area	Attainment area
Finding:					
1	Permits	o	o	o	o
2	Population	X			
3	Traffic			X	
4	PSD	o	X		X
5	NAAQS	X	o	o	X
6	Control measures	X	X	X	

Key: X = always, o = sometimes

UPPER ARKANSAS
Water Conservancy District



PHONE 539-3508

P O BOX 1888 1090

SALIDA, COLORADO

81201

FOREST SERVICE RESPONSE

December 14, 1982

Bruce H. Morgan
Forest Supervisor
U. S. Department of Agriculture
Forestry Service
Pike and San Isabel National Forest
1920 Valley Drive
Pueblo, CO 81008

Re: U.S.D.A.
Sangre de Cristo
Wilderness Study Area Report

Dear Mr. Morgan:

On behalf of the constituents of the Upper Arkansas Water Conservancy District, the Board of Directors of the District has reviewed the Sangre de Cristo Wilderness Study Area Report and has instructed me as Chairman of the Board to respond to the proposed land management plan.

Specifically we object to any reclassification of land management and forestry management which would prohibit or inhibit the users of water and owners of water originating in the forest area from maintaining ditches and ditch rights-of-way in the historical manner which these owners and water users have enjoyed for more than a century of time.

Water represents a real property right which is fundamental in the United States Constitution and in the Colorado Constitution and any restraint on use of this real property right appears, in our opinion, to be inverse condemnation without compensation.

We trust that this objection will be considered very strongly and that if the proposed land management plan is imposed upon the forest, that the water users' rights and water owners' rights shall be protected against any infringement which appears to be proposed in the plan.

Sincerely,

Denzel Goodwin
Chairman of the
Board of Directors

/tq

cc. Members of the Board of Directors

VI-209

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- 1 Wilderness designation for the Sangre de Cristo Wilderness Study Area (and inclusion of any lands in the National Wilderness Preservation System) does not affect or inhibit users of water or owners of water originating on these lands where valid water rights are held.
2. The Forest Service agrees. The Forest Plan does not place any restraints on water resources which are real property rights.
- 3 The objection stated has been considered. No infringement of water user's rights or water owner's rights is implied or intended by implementation of the Forest Plan.



REPLY TO
ATTENTION OF

MROPD-M

LETTER F-2

DEPARTMENT OF THE ARMY
OMAHA DISTRICT CORPS OF ENGINEERS
6014 U S POST OFFICE AND COURTHOUSE
OMAHA NEBRASKA 68102

FOREST SERVICE RESPONSE

18 October 1982

Mr Bruce H Morgan, Forest Supervisor
U.S. Forest Service
Pike and San Isabel National Forests
1920 Valley Drive
Pueblo, CO 81008

Dear Mr. Morgan

We appreciate the opportunity to review and comment on the proposed long-term management and DEIS for the Pike and San Isabel National Forests and the Comanche and Cimarron National Grasslands. Our comments are as follows

The document makes no mention of Section 404 of the Clean Water Act and the Corps of Engineers' jurisdiction thereof. Section 404 of the Clean Water Act (33 U.S.C. 1344) regulates the discharge of dredged or fill material in our Nation's waterways, lakes, and wetlands. Such activities must be authorized under the Nationwide permit or permitted by an individual Department of the Army permit

1 We have added the requirements of Section 404 of the Clean Water Act Amendments ("Federal Water Pollution Control Act Amendments of 1972"), October 18, 1972 (P L 92-500) See FEIS, Chapter III, Water section

VI-210 In the discussion of the alternatives, several statements are made concerning watershed improvements and road construction. It is inevitable, as with all projects of this nature, that filling activity will take place whether in a waterway or wetland. Individual or Nationwide permits will be required for filling activities associated with wetlands. These actions will be evaluated on a case-by-case basis. Filling activities on waterways having an average annual flow of less than 5 cubic feet per second will generally be considered under the Nationwide permit concept. Individual permits will be required for filling activities on waterways where the average annual flow is greater than 5 cubic feet per second.

2 Water development proposals and facilities will be evaluated in detail on an individual case basis

Management requirements in the Forest Plan, Chapter III, specifically in Management Area Prescription 9A (Emphasis is on Riparian Area Management) provide the necessary protection for riparian areas for project activities including watershed improvements and road construction. The need for a "404 Permit" or other permits is determined during the scoping phase of any project. The permitting agencies are then asked to supply information for or to participate in the environmental analysis process.

Sincerely,


ARVID L. THOMSEN
Chief, Planning Division

STATE OF COLORADO

DIVISION OF COMMERCE AND DEVELOPMENT
Department of Local Affairs

1313 Sherman Street Room 523
Denver Colorado 80203
Phone (303) 866-2205

October 18, 1982

Bruce Morgan
Supervisor
Pike and San Isabel National Forests
910 Highway 50 West
Pueblo, CO 81008

Dear Mr Morgan

I would like to put on record the State of Colorado's support, from an economic development perspective, of the proposed development of Quail Mountain and Twin Lakes Recreation Complex

Lake and Chaffee Counties, where the development would be located, are priority targets for State assistance to local economic development efforts because of the area's excessive dependence on the mining industry, and its resulting vulnerability to the historically cyclical character of this industry. The present depressed economic condition of the mining industry and the Leadville-Buena Vista area lend urgency to this need, but I want to stress that the State sees economic diversification as a long-term problem, requiring for its solution a long-term commitment to quality development such as is proposed by Twin Lakes Associates. Such a year-round recreational development at Twin Lakes will also help meet another goal of Colorado's economic development policy, to encourage intensive tourism development areas outside of the I-70 corridor.

Before it becomes a reality, the Quail Mountain/Twin Lakes development will have to comply with appropriate federal, state and local regulatory requirements in a satisfactory manner, and this Division's support presumes that the developers will do so.

I want to urge you to continue to include the proposed development of Quail Mountain and Twin Lakes in Forest Service planning, and to facilitate a fair and speedy review of necessary permit applications

Sincerely,


Steve Schmitz
Director

SS/jk

cc. Dennis O'Neill, Twin Lakes Associates



Richard D Lamm
Governor
Morgan Smith
Executive Director
Steve Schmitz
Division Director

FOREST SERVICE RESPONSE

1 The Forest Service is directed (40 CFR 1501.6) to cooperate early in the National Environmental Policy Act process and to request (40 CFR 1501.6 (a)(1)) the participation of each cooperating agency at the earliest possible time in proposed activities where compliance with various Federal, State and local regulatory requirements is necessary. This permits State, County and local agencies to coordinate review processes between and within Federal, State and local levels of government. It also provides proponents of resource development actions or activities on National Forest System lands with a means for obtaining a coordinated review of their proposals by all governmental entities having permitting or regulating authority relative to the proposal or having special expertise with respect to anticipated environmental, social, and economic impacts. This coordinated interagency planning and review process is known as the Joint Review Process (JRP). Also, the public is invited to participate in the JRP meetings affording them the opportunity to comment on the process. The JRP insures that all governmental entities have an understanding of the project.

The Forest Plan, Chapter III, Management Area Prescriptions have been revised to more clearly display the management requirements and standards to be achieved when development of potential and allocated winter sports (ski areas) sites occurs.

2 The Quail Mountain area has been assigned Management Area Prescription 1B-2, which provides management direction and emphasis for potential winter sports sites. Forest Service policy in providing downhill skiing is to maintain the opportunity for expansion or new construction by the private sector to meet public needs. The Rocky Mountain Regional Guide has assigned a Priority 2 rating to Quail Mountain. The Regional Guide provides a priority rating system that guides scheduling of development for allocated winter sports sites (downhill ski area proposals and potential ski areas). Priority 2 sites will be considered for development after Priority 1 areas are fully developed or the State of Colorado and affected counties notify the Forest Service of their desire to initiate and underwrite necessary studies. In this case, the Forest Service would coordinate development of the study plan (studies to be performed and/or underwritten by the State of Colorado and affected counties). The Forest Service will manage Priority 2 areas to maintain their suitability until determinations of suitability or unsuitability are made.

VI-211

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LETTER F-4

United States Department of the Interior
OFFICE OF SURFACE MINING
Reclamation and Enforcement
BROOKS TOWERS
1020 15TH STREET
DENVER, COLORADO 80202

FOREST SERVICE RESPONSE

September 13, 1982

Mr. Bruce H. Morgan, Forest Supervisor
Pike and San Isabel National Forests
1920 Valley Drive
Pueblo, CO 81008

Dear Mr. Morgan:

Thank you for sending us the copy of your Proposed Land and Resource Management Plan for the Pike and San Isabel National Forests, the draft environmental impact statement (DEIS) on the proposed plan, and the summary document for both draft EIS and proposed plan.

We have reviewed the DES and Management Plan and have no comments at the present time. If a coal exploration and/or mining plan were to be submitted, following coal leasing, the OSM would be involved in the mine permitting process under the provisions of the Surface Mining Control and Reclamation Act of 1977.

1
EL

- 1 We have added the reference to the Surface Mining Control and Reclamation Act of 1977 See FEIS Chapter III, Minerals and Geology section.

VI-212

Once again, thank you for the opportunity to comment. If you have any further questions, please direct them to Charles M. Albrecht, Chief, Environmental Analysis Branch, Western Technical Center. (303) 837-5656.

Sincerely,

Allen D. Klein
for Allen D. Klein
Administrator
Western Technical Center



LETTER F-5 U.S. Department of Housing and Urban Development
 Denver Regional/Area Office, Region VIII
 Executive Tower Building
 1405 Curtis Street
 Denver, Colorado 80202

PIKE & SAN ISABEL NATIONAL FORESTS
 DENVER, CO

FOREST SERVICE RESPONSE

32 OCT 26 AM 10:39

RECEIVED
 OCT 22 1982
 P&D

October 21, 1982

Mr Craig W. Rupp
 Regional Forester, Rocky Mountain Region
 U. S. D. A. Forest Service
 11177 West 8th Avenue
 Lakewood, CO 80225

Dear Mr. Rupp

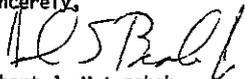
Thank you for the opportunity to review and comment on the draft environmental impact statement (EIS) for the Pike and San Isabel National Forests, and the Comanche and Cimarron National Grasslands, Land and Resource Management Plan

Your EIS has been reviewed with specific consideration for the areas of responsibility assigned to the Department of Housing and Urban Development. This review considered the proposal's compatibility with local and regional comprehensive planning and impacts on urbanized areas. We do not endorse one alternative over another, but do find that this EIS is adequate for our purposes.

No response necessary.

If you have any questions regarding these comments, please contact Mr. Carroll F Goodwin, Area Environmental Officer, at 837-3102.

Sincerely,


 Robert J. Matuschek
 Director
 Office of Regional Community
 Planning and Development, 8C

VI-213

LETTER F-6
LAKE COUNTY ASSESSOR

P. O. Box 28
Leadville, Colorado 80461
Telephone 303-486-0413

FOREST SERVICE RESPONSE

October 27, 1982

Mr Bruce Morgan, Supervisor
Pike and San Isabel National Forests
910 Highway 50 West
Pueblo, CO 81008

Re Proposed Quail Mountain Ski Area

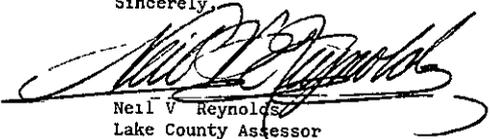
Dear Mr Morgan,

I am writing to request that favorable consideration be given to the proposed ski area located near Twin Lakes here in Lake County. As a concerned county official, I am quite eager to see diversification of our economic base. I am all too familiar with the plight of the county, due to its historic dependence on the fluctuating mining industry.

From an assessment point of view, the tax base of the county will certainly be increased, and the resultant activity at Twin Lakes will only enhance those attractions Leadville-Lake County has to offer. I feel that the area, if properly planned and developed, will be of great economic, cultural, and, perhaps most important, psychological benefit.

Should your office have any questions regarding the effect of such a proposed development on our county, our office will make every effort to co-operate with you. Again, I urge you to consider this request favorably.

Sincerely,


Neil V Reynolds
Lake County Assessor

NVR/clc

- 1 The Forest Plan allocates Quail Mountain as a potential winter sports site for further study as a ski area. The Forest Service recognizes that planned developments, such as ski areas, do contribute support to the economic climate of a community. See Forest Plan Map and Chapter III, Forest Plan (Management Area Prescription 1B-2).
- 2 The Forest Plan, Chapter III, MANAGEMENT DIRECTION, provides management requirements for locating and designing developments to meet the concerns you have expressed. Prior to any work or commitments, the area will be thoroughly analyzed through the Joint Review Process (JRP). The JRP and resulting environmental documents will address the on and off-site impacts of the proposed project. The impacts on wildlife, cultural resources, water, recreation, grazing, and scenic quality will be analyzed with public input. In addition the off-site impacts such as economics, quality of life, air and water quality, and housing will be addressed.

The JRP is an open forum and concerned citizens are encouraged to participate during the entire process.

VI-214

UAACOG

UPPER ARKANSAS AREA COUNCIL OF GOVERNMENTS
P O Box 510 Canon City, Colorado 81212

FOREST SERVICE RESPONSE

November 8, 1982

Bruce Morgan
Supervisor
Pike and San Isabel National Forests
910 Highway 50 West
Pueblo, Colorado
81008

Dear Mr. Morgan:

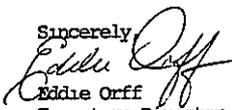
The UAACOG hereby endorses the Quail Mountain/Twin Lakes Recreational Complex as being a vital link to jobs and economic stabilization of the Chaffee and Lake County areas.

The local officials have worked on many projects designed to boost their local economies. This project is part of their efforts to diversify the local economy away from single-purpose industries that fluctuate depending upon the national economy. Intensive tourism projects like this proposed project are a viable means towards solving the current problems being experienced due to mining layoffs in the area.

I support this proposed development project and urge you to include it in your Forest Management Plan for the Pike and San Isabel National Forests.

} 1

Sincerely



Eddie Orff
Executive Director
UAACOG

cc: Dennis O'Neill, Twin Lakes Associates

1 The Forest Plan allocates the Quail Mountain potential winter sports site for consideration for future ski area development. Forest Service policy in providing development opportunity for winter sports (downhill skiing) is to maintain the opportunity for expansion or new construction by the private sector to meet public needs. Current management emphasizes providing for expansion of existing areas.

The Rocky Mountain Regional Guide displays the priority for development for Quail Mountain as Priority 2. Regional Priority 2 sites will be considered for development only after Priority 1 (Regional Guide Priority) areas are fully expanded and developed, or the State of Colorado and affected counties notify the Forest Service of their desire to initiate and underwrite necessary studies.

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LETTER F-26
THE BOARD OF COUNTY COMMISSIONERS
CHAFFEE COUNTY
P.O. BOX 699
SALIDA, COLORADO 81201
(303) 539-2218

FOREST SERVICE RESPONSE

November 12, 1982

Bruce Morgan
Supervisor, Pike and San Isabel
National Forests
910 Highway 50 West
Pueblo, CO 81008

Dear Mr. Morgan:

The Chaffee County Board of County Commissioners would like to go on record as supporting the proposed development of Quail Mountain Twin Lakes Recreation Complex.

We are giving a high priority to a diversified economy for Chaffee County in light of problems at the Amax mine at Climax. The Forest Service has taken several thousand acres and put it in wilderness area. Surely you can allow a few acres to be used to bring potential dollars to this area

We have an excellent tourist type economy. The development of this area will enhance the year-round activities in the Leadville and Buena Vista areas.

We would like to request that you expedite the federal regulatory requirements when it is possible to do so.

For the Chaffee County Commissioners.

Sincerely,

Harold Blackwell
Harold Blackwell
Chairman

cc Dennis O'Neill, Twin Lakes
Associates
Bill Hall, Chaffee County Partnership
Steve Schmitz, Director, Division of
Commerce and Development

1 The Quail Mountain area has been assigned Management Area Prescription 1B-2, which provides management direction and emphasis for potential winter sports sites. Forest Service policy in providing downhill skiing is to maintain the opportunity for expansion or new construction by the private sector to meet public needs. The Rocky Mountain Regional Guide has assigned a Priority 2 rating to Quail Mountain. The Regional Guide provides a priority rating system that guides scheduling of development for allocated winter sports sites (downhill ski area proposals and potential ski areas). Priority 2 sites will be considered for development after Priority 1 areas are fully developed or the State of Colorado and affected counties notify the Forest Service of their desire to initiate and underwrite necessary studies. In this case, the Forest Service would coordinate development of the study plan (studies to be performed and/or underwritten by the State of Colorado and affected counties). The Forest Service will manage Priority 2 areas to maintain their suitability until determinations of suitability or unsuitability are made.

Demand is increasing for all types of recreation opportunities and experiences. Providing a balance in recreational opportunities that satisfies demand while minimizing conflicts with other resource values such as big game winter range, is a goal of the Forest Plan. The Plan provides for a combination of uses of National Forest System lands that does meet demand, while minimizing adverse impacts and conflicts.

2 The Forest Service administers National Forest Service lands under laws and regulations established by the Congress. The Forest Plan provides for expeditious action regarding proposed activities for National Forest System lands. See Chapter II, MANAGEMENT SITUATION, PHYSICAL and BIOLOGICAL FUTURE, and Chapter III, MANAGEMENT DIRECTION, Forest Plan.

VI-216

Lake County Soil Conservation District
Box 566
Leadville, Colorado 80461
November, 5, 1982

FOREST SERVICE RESPONSE

Forest Supervisor
USDA Forest Service
1920 Valley Drive
Pueblo, Colorado 81008
Attention: Mr. Ben Butler

Dear Sir,

The Lake County Soil Conservation District is concerned about the Pike-Jan Isabel Management Plan for the Upper Arkansas.

We understand that over 200 acres of timber are to be harvested each year thru the next ten years. This is to increase water yield and wild life habitat in Lake County and northern Chaffee County.

The Lake County Soil Conservation District does not believe that the timber is present. We also believe that with this amount of clear cutting, Lake County's stream banks will be subjected to increased erosion. The stream banks are being damaged at the present time by trans-mountain diverted waters. The entities involved in the diversions have done little to protect the bank erosions.

The Upper Arkansas and its tributaries are contaminated by mine discharges. The discharges settle to the bottom of the channels until high runoff. Disturb the sediment and contaminate the fisheries, irrigation waters, as well as vegetation along the banks.

VI-217

1
2
3

- 1 Management Area Prescriptions in Lake County that emphasize commercial timber harvest designed for increased water yield have been removed and have been replaced with prescriptions that emphasize recreation opportunities. See the Forest Plan Map and Appendix G, in the FEIS for these prescription changes

Comments received on the Proposed Forest Plan resulted in a reanalysis of the timber program for Lake County. As a result, the Plan has been revised to insure compatibility with the Lake County Comprehensive Master Plan. The timber program has been reduced by 50%. These changes place more emphasis on the recreation, visual and wildlife resources of Lake County
- 2 Timber inventories completed in 1980 show that timber volume is obtainable for Forest Plan objectives. These inventories are on file and are available for review in the Forest Supervisor's Office, Pueblo
- 3 The reanalysis of the proposed Plan resulted in changing all of the 9B Management Prescription Areas, with emphasis on increased water yield through vegetation manipulation, within Lake County to management prescriptions which emphasize recreation opportunities. This resulted in a significant reduction in the timber harvest level from the proposed 4.8 MBF to 1.8 MBF per year. The 9B Management Prescription emphasized harvesting the spruce/fir and lodgepole pine types using the clearcut method in order to achieve the desired water yields. The prescriptions with a recreation emphasis allow the use of the clearcut, shelterwood or selection harvest methods, and require less vegetation manipulation to meet their objectives. The potential for increased erosion above natural levels has been greatly reduced by these changes

Letter F-35 continued

As lifelong residents of the area we urge that these problems
be addressed. We would like to meet with you and discuss the
problems.

4

Yours truly,

Walter Clotworthy
Walter Clotworthy, President

FOREST SERVICE RESPONSE

- 4 The Final EIS and Forest Plan address your concerns. Forest officers welcome the opportunity to discuss these issues. The District Ranger in Leadville as well as Forest officers in Pueblo, are available to meet and discuss your concerns at any time. Please give us a call at 545-8737 (Pueblo office) or 486-0752 (Leadville office).



United States
Department of
Agriculture

Soil
Conservation Service P. O. Box 17107
Denver, CO 80217

LETTER F-95

FOREST SERVICE RESPONSE

November 30, 1982

U. S. Forest Service
Bruce Morgan, Supervisor
Pike-San Isabel National Forest
1920 Valley Drive
Pueblo, CO 81008

Re: Review of draft EIS/Comanche National Grasslands

Dear Mr. Morgan:

Review of the draft EIS for the Comanche National Grasslands revealed only one area of concern to the Soil Conservation Service. On page 195 of the draft EIS it is estimated that the average acceptable level of soil erosion is estimated to be 4 tons/acre. This figure seems high for soil loss from grasslands.] 1

Thank you for the opportunity to comment.

Sincerely,

Wendell S. Harrell Acting
Sheldon G. Boone
State Conservationist

cc: Peter C. Myers, Chief, SGS, Washington D.C.

1 Soils with favorable substrata that can be renewed by tillage, fertilizer, organic matter, or other management practices are considered to be renewable soil. In 1979 the Soil Conservation Service (SCS) published a guide for assigning soil loss tolerance values. Four tons per acre per year is consistent with the 1979 Guide. However, in 1982 the National Resource Inventory (NRI), published by SCS estimated 3.1 tons per acre per year to be the average acceptable soil loss for rangelands in Colorado. We feel that 4 tons per acre per year is an average maximum acceptable level of soil loss on the National Grasslands when mitigation measures have been applied.

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The Soil Conservation Service
is an agency of the
Department of Agriculture



LETTER F-102

United States Department of the Interior

OFFICE OF THE SECRETARY
OFFICE OF ENVIRONMENTAL PROJECT REVIEW

Room 688, Building 67
Denver Federal Center
Denver, Colorado 80225

FOREST SERVICE RESPONSE

IN REPLY
REFER TO:

DEC 02 1982

ER 82/1538
82/1656

Mr Bruce H. Morgan
Forest Supervisor
Pike and San Isabel National Forests
1920 Valley Drive
Pueblo, Colorado 81008

Dear Mr Morgan

We have reviewed the draft Environmental Impact Statement and the Land and Resource Management Plan for the Pike and San Isabel National Forests and the Comanche and Cimarron National Grasslands, as well as the Wilderness Study Area Reports for the Spanish Peaks, Greenhorn Mountain, Buffalo Peaks and Sangre de Cristo areas within the Pike, San Isabel and Rio Grande National Forests of Colorado.

LAND AND RESOURCE MANAGEMENT PLAN

Fish and Wildlife Resources

Overall, the plan represents a great improvement in the management of fish and wildlife resources on the Forests and Grasslands. We suggest that the Forest Service coordinate the fish and wildlife aspects of the plan closely with the Colorado Division of Wildlife and the Kansas Forestry Fish and Game Commission.

The management plan should ensure compliance with the Migratory Bird Treaty Act and the Bald Eagle Protection Act. Such provisions are of particular importance in determining the suitability and/or acceptability of areas for mineral leasing activities. We could find no discussion of either Act and believe that this omission should be rectified in the final plan.

On page 25, Threatened and Endangered Species, both the bald eagle and the peregrine falcon should be shown as occurring on the Forest seasonally during their migration periods.

Pages 91, 98, 99, and 102 state "A conclusion by the Forest Service (FS) and/or the United States Fish and Wildlife Service (USFWS) that the action will jeopardize the survival or recovery of federally listed threatened or endangered (T&E) wildlife or plant species." To be consistent with the Endangered Species Act, we recommend that the word "will" be changed to "is likely to."

- 1 Coordination with Federal and State wildlife agencies is an integral part of the NEPA and NFMA planning processes. The Forest will continue such coordination both at the long-range and project levels.
- 2 A discussion of the requirements of the Migratory Bird Treaty Act and the Bald Eagle Protection Act has been included in the FISH AND WILDLIFE section of Chapter III, in the FEIS. Project analysis provides for compliance with the provisions of both the aforementioned acts for all activities conducted on the Forest.
- 3 These species have been added to discussions in the THREATENED AND ENDANGERED SPECIES section of Chapter II, in the Forest Plan.
- 4 This change has been made. See the Forest Direction section, Chapter III, Forest Plan.

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FOREST SERVICE RESPONSE

In specific reference to the Cimarron National Grasslands in Kansas, several management indicator species were listed. In order to maintain or improve habitats for these species, proper grazing and grassland management must be considered. Consideration of unused (ungrazed) blocks of grassland and avoidance of grazing in riparian areas would improve habitat conditions for these species. The addition of these management options into the proposed forest management plan (Alternative A) should be considered.

5

5 Grazing and grassland management will be done with full consideration for maintaining management indicator species habitat and plant and animal diversity. Management through light or no grazing does not necessarily improve wildlife habitat conditions, but are options that can and are being used to meet range management objectives. See Management Direction, Chapter III, of the Forest Plan.

Cultural Resources

The draft Plan sets forth (p 32) three "themc" criteria for nomination of properties to the National Register of Historic Places. We recommend that this policy be restated to more accurately reflect the requirements of Section 110(a)(2) of the National Historic Preservation Act of 1966 (as amended), which directs each Federal agency to "establish a program to locate, inventory, and nominate . . . all properties under the agency's ownership or control that appear to qualify for inclusion on the National Register . . .", and the National Register criteria (36 CFR 60)

6

6 This statement has been reworded. The intent is to be in full compliance with the National Historic Preservation Act of 1966 (as amended).

Mineral Resources

The general direction seems to imply that leases or permits would be denied on some National Forest land in cases where 31 degree (60 percent) or steeper slopes are associated with a lease or a potential mining operation. Thirty-one degree slopes may commonly be found in the mountainous areas contained in the National Forests. It is likely that many mineral resources can be found in steeply dipping terrain having slopes greater than 31 degrees. It should be made clear whether a 31 degree (60 percent) slope connected in any manner with the applications for leases, permits, or coal exploration licenses is considered sufficient reason in and of itself to recommend against or deny consent. If so, this policy seems unrealistic, and should be reevaluated.

7

7 The direction statement lists "slopes steeper than 60 percent" as one of the site-specific considerations that will be evaluated in a determination that may result in a negative recommendation or consent denial to BLM for issuance of leases. However, such recommendations would be made only when protection of the surface resources is not possible through the utilization of stipulations pertaining to leasing. (See Appendix F of the Forest Plan).

8 The combined U S Geological Survey and Bureau of Mines mineral surveys have been completed. These reports are considered to be the best available information on the mineral resources of the Wilderness Study Areas. Accordingly, the condensed information as presented in Geological Survey Professional Paper 1300 has been incorporated into the Final Wilderness Study Area Reports. See Appendix C, FEIS. Copies of the USGS reports are found in Appendix I of the Forest Plan.

WILDERNESS STUDY AREA REPORTS

Mineral Resources

We recommend that the following be incorporated into the wilderness study area (WSA) reports. Lands in the Spanish Peaks, Greenhorn Mountain, and Buffalo Peaks areas are classified as prospectively valuable for oil and gas. The lands in the Spanish Peaks area are also classified as prospectively valuable for coal, and the lands in W1/2 NE1/4, W1/4, section 31 T 30 S, R 68 W, 6th Principal Meridian, were classified as coal land on December 28, 1910, and October 1, 1964. The lands in the Buffalo Peaks area in sections 18, 19, and 30, T 12 S, R 77 W, 6th Principal Meridian, are also classified as prospectively valuable for potassium and sodium.

8

9 See response number 8 above.

The four subject reports should include statements referring to the combined U S. Geological Survey (USGS) and Bureau of Mines mineral surveys being done on each of the WSA's. Although reports have not yet been completed on the 1982 field investigations of the WSA's, USGS provides the following, based on preliminary examination of the field data and general knowledge of the region.

9

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FOREST SERVICE RESPONSE

Spanish Peaks The WSA report considers much of the area to have moderate to high potential for both locatable and leasable minerals. USGS field work has not disclosed any significant mineralization. Preliminary data suggest a low potential for locatable minerals only near the summit of the West Spanish Peak. Coal underlies the study area at great depth.

10

10. See response number 8 above

Greenhorn Mountains The WSA report indicates a high potential for locatable minerals in much of the study area. Although there is significant mineralization outside of the study area, USGS studies failed to identify geological environment favorable for mineral deposits and a gamma-ray scintillometer survey did not locate any anomalous radioactivity within the study area.

11

11 See response number 8 above

Buffalo Peaks The report indicates low to high potential for locatable minerals and low to high potential for leasable minerals in various parts of the study area. USGS studies have delineated four areas of mineral potential.

1 Low to moderate potential for occurrence of silver-bearing lead-zinc veins in an area which includes the western margin of the Weston Pass district.

12

12 See response number 8 above

2 Moderate potential for uranium resources in an area south of the Buffalo Peaks. Significant uranium-bearing jasperoid resources are estimated by claim holders.

3 and 4. In areas representing the eastern margin of the Granite district (3) and the Fourmile district (4), quartz-pyrite-gold veins in Precambrian rocks hold potential for gold resources. Although most of the Granite and the Fourmile districts lie outside of the study area, the mineralization is thought to extend into the study area.

Sangre de Cristo The WSA report suggests high potential for leasable minerals along the eastern side of the central part of the study area. The assessment is probably based on the belief that the study area lies in a thin-skinned thrust belt. During USGS field work, source and reservoir rocks were not found at the surface and aeromagnetic maps indicate that most of the faults are not shallow thrusts, thus placing the targets for oil and gas, if any, at great depth. The only potential for leasable minerals identified is for geothermal power along the west-central side of the study area. USGS studies indicate a) high potential for locatable minerals (base-metal resources Cu, Pt, Zn, Au, and U) in two areas, one in the east-central and one in the south-eastern part, and, b) moderate potential for locatable minerals in several northwest-trending elongated zones in western, central, and eastern parts of the study area.

13

13 See response number 8 above

The results of mineral surveys should be fully considered before making final recommendations for each of the four WSA's.

Fish and Wildlife Resources

On pages 29, and 99 of the Sangre de Cristo report reference is made to the greenback cutthroat trout (Salmo clarki sotoanus). The greenback is native only to the eastern slopes of the Sangre de Cristo Mountains. The native

VI-222

cutthroat on the western slopes is the Rio Grande cutthroat (Salmo clarki virginalis). The Rio Grande cutthroat is state-listed as a threatened species. Aquatic Biologist Laurence Zuckerman, Colorado State University, states the western slope of the Sangres has not been well surveyed for Rio Grande cutthroat and remnant populations may still occur. Populations do occur on private land to the south of the WSA. In addition, Mr. Zuckerman will be recommending in a report being done for the National Park Service that Medano Creek be considered for possible reintroduction of Rio Grande cutthroat. According to Mr. Zuckerman, Medano Creek meets all of the criteria for reintroduction developed by the Colorado Division of Wildlife.

14

Great Sand Dunes Wilderness

The National Park Service supports the Sangre de Cristo Wilderness preferred alternative (p. 29) as extending wilderness opportunities beyond that found in the Great Sand Dunes Wilderness, as well as complementing the use of the national monument as a whole. Moreover, the recommendation that WSA lands adjacent to the Great Sand Dunes National Monument be unavailable for mineral leasing will help maintain the integrity of the aesthetic view of the Sangre de Cristos from Great Sand Dunes and the Class I air quality in the Great Sand Dunes Wilderness.

15

We question the designation of lands in Figure 11 (p. 67) on the eastern boundary of Great Sand Dunes National Monument as semiprimitive motorized. The only road penetrating into that zone is one short jeep road up Morris Gulch behind the monument residence area. There is no possibility of motorized travel anywhere else in the zone shown. In addition, we suggest that Table J (p. 100) of the Sangre de Cristo document could be improved by including Great Sand Dunes Wilderness.

16

BLM Wilderness Study Areas

To insure that readers understand that some of the WSA's included are managed by the Bureau of Land Management, we suggest that the BLM WSA unit numbers be included in the text and that the units be individually identified (labelled) on the maps. The unit numbers are: Black Canyon - 050-131, South Piney Creek - 050-132B, Sand Castle - 050-135, Papa Keal - 050-137, and Zapata Creek - 050-139B.

17

National Natural Landmarks

The Spanish Peaks have been designated as a National Natural Landmark because of nationally significant geological features. We believe that wilderness designation would also enhance this area's natural qualities and therefore its designation as a national natural landmark. Although much of the NNL is recommended as unavailable for mineral leasing or for no-surface-occupancy leasing, exploration/development of locatable minerals appears to be permitted. The Spanish Peaks WSA report should fully evaluate the effects of non-wilderness designation on the National Landmark.

18

Cultural Resources

It does not appear that cultural resources have been given adequate analysis in these documents or in the planning process. The Sangre de Cristo document acknowledges the presence of a number of historic features in the WSA, and the

FOREST SERVICE RESPONSE

14 Habitat for the Rio Grande cutthroat trout was considered in making the Forest Service recommendation for the Sangre de Cristo Wilderness Study Area. The Division of Wildlife, National Park Service, and Forest Service are working together to recover this species from its threatened status.

15 This is good rationale in support of wilderness designation for the Sangre de Cristo Wilderness Study Area. This rationale has been incorporated into the Final Wilderness Study Report. See Appendix C, FEIS.

16 The ecosystems and landform of the Great Sand Dunes Wilderness are unique. Comparisons with the Sangre de Cristo Wilderness Study Area would not serve a meaningful purpose and does not warrant revising Table J.

17 This is a good suggestion. These numbers have been included and the units have been identified by number.

18 The effect of non-wilderness prescriptions on natural landmark status has been addressed in the Final Wilderness Study Area Report.

FOREST SERVICE RESPONSE

Greenhorn Mountain and Spanish Peaks documents indicate a commitment to carry out cultural resource surveys prior to any ground-disturbing activities. However, none of the documents is complete in analyzing existing cultural resources or the impacts to be expected from the non-wilderness alternatives. The Buffalo Peaks document contains no mention of cultural resources whatsoever.

19

19 The Wilderness Study Area reports have been expanded to better address cultural resources. See Appendix C, Final EIS.

DRAFT ENVIRONMENTAL IMPACT STATEMENT

General Comments

We note that provision has been made (p. 3) for subsequent environmental analyses and EIS's tiered from this Forest Plan EIS. This is most appropriate, since this document recognizes only the general impacts anticipated, not their extent or severity. Depending on their location and timing, such future actions such as mining, new downhill ski development, or timber harvest could have significant impacts and require specific mitigation measures beyond the coverage of the EIS.

Mineral Resources

The draft discusses five alternatives (A through E) that were considered in developing the proposed Land and Resource Management Plan. The 98,862 acres of Forest land withdrawn from leasing and mineral entry are treated the same in each alternative. Two hundred seventy-two Forest Service withdrawals are to be reviewed by 1989, and other agency withdrawals are to be reviewed by 1991. In all cases where practical, these withdrawals should be revoked and the land opened to leasing and mineral entry.

20

20 The Forest Service has certain discretionary authority in determining recommendations to the Bureau of Land Management concerning mineral leasing. Mineral leasing described in the EIS deals with minerals disposable under the leasing laws of the United States. Locatable minerals are disposable under general mining laws. Discussions of these activities have been expanded in the MINERALS sections of Chapters III and IV, of the FEIS.

VI-224

The nine minerals and their places of occurrence listed on page 137 of the EIS are not all of the known mineral occurrences in the planning area. Books and papers on geology containing more data on mineral occurrences are listed in the references (Appendix A). It is suggested that the list on page 137 should be expanded to include all known mineral occurrences, or the text should be changed to show that the list contains only selected known mineral occurrences and to explain why only these selections are listed.

21

21 We have changed the reading in the text to show that the table displays some of the known mineral occurrences in the planning area. See the section on MINERALS Chapter III, FEIS.

In particular, oil and gas, potassium and sodium resources should be acknowledged. We offer the following information pertinent to these resources.

The 23 productive oil and gas fields mentioned in the Cimarron National Grasslands plan (but not on page 137 of the DEIS) are included in the Hugoton Known Geologic Structure, which covers in excess of four million acres in Kansas, Oklahoma, and Colorado, and has been producing from one of the largest gas accumulations in the world since 1923. The name is widely recognized and should be referred to in the EIS.

22

22 We appreciate this information. It has been added to the MINERALS section, Chapter III, FEIS.

In addition, prospectively valuable classifications for potassium and sodium and their potential developmental impacts were omitted. In June 1977, the Conservation Division of the U.S. Geological Survey (now MMS) classified the following lands within the Comanche National Grasslands as prospectively valuable for sodium.

FOREST SERVICE RESPONSE

6th PM, Colorado

- Ts 31 through 35 S , R. 44 W
- T 31 S , R 45 W , secs 15, 22, 25, and 36
- T. 32 S., R 45 W., secs. 3, 10, 13, 24, 25, and 36
- Ts. 33 through 35 S., R. 45 W.
- T. 31 S., R. 46 W., secs. 6, 7, 8, 24, and 30
- Ts 33 through 35 S., R. 46 W
- Ts. 31 through 35 S , R. 47 W
- Ts. 31 through 35 S., R 48 W.
- T. 31 S., R 50 W
- secs. 1 through 4
- secs. 12 through 15
- secs. 22, 23, 25, 26, 27, 35, and 36
- T 32 S , R. 50 W
- secs 2, 3, 10, 11, 12, 14, 15, 22, 23, 25, 26, and 33
- T. 33 S , R 50 W
- secs 1 and 4
- secs 9 through 12
- secs. 25, 26, 27, and 35
- T 34 S., R. 50 W
- secs. 1, 2, and 3
- secs. 10 through 14
- secs 23, 24, 25, 34, 35, and 36
- T. 35 S , R 50 W , sec 1

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All the lands in the Cimarron National Grasslands are classified as prospectively valuable for sodium

The lands in Pike and San Isabel National Forest in T 13 S., R. 76 W , and Ts 12 and 13 S., R. 77 W., 6th PM, are classified as prospectively valuable for potassium and sodium

The lands in Rio Grande National Forest in sec. 11, T 47 N , R 7 E., NMPM, are classified as prospectively valuable for potassium

Water Resources

The characterization of the proposed action (Alternative A) as emphasizing water yield is misleading (summary). The differences in the water yield estimated for the various alternatives are too small to be measurable and are not significant. For instance, the difference in water yield between the proposed action and the 1980 RPA goals (Alternative C) is estimated to range from zero in the first decade to 0.2 percent in the fifth decade (Table IV-25, p. 187).

Cultural Resources

As stated on page 45 of the EIS, Alternative A presents the greatest potential for disturbance of cultural resources. We agree that intensive surveys prior to resource activity are helpful in locating such resources. However, if Alternative A involves the greatest number of acres of treatment of timber and other resource activities, as noted in Table II-2, then potential loss of

23

24

23 We appreciate this information. It has been included in the MINERALS section, Chapter III, FEIS

24 We agree that Alternative A as described in the Proposed Forest Plan should not have been described as emphasizing water yield. The emphasis on water yield has been removed. However, the Forest will modify some management activities to enhance water yields and water quality.

FOREST SERVICE RESPONSE

cultural resources is greater under this alternative than any other. We must also question the statement under Alternative C that protection for cultural resources inside wilderness areas is poor. On the contrary, it would seem that wilderness designation would enhance protection of cultural resource sites by reducing the level of activities which might threaten such sites. We would like to see some clarification of this position in the final EIS.

25

25 Additional discussions regarding management of cultural resources has been included in the Forest Plan and the FEIS See Chapter III, MANAGEMENT DIRECTION, Forest Plan and the section, COMPARISON OF ALTERNATIVES AND ENVIRONMENTAL CONSEQUENCES, Chapter II, FEIS

Furthermore, it is indicated on page 107 that detailed and comprehensive cultural resource surveys, including evaluations of cultural resources for National Register eligibility, have not yet been completed The future environmental documents, which will include site-specific detail for project-level decisions and which will be tiered from the present "umbrella" environmental document, should include evidence of compliance with Section 110 of the National Historic Preservation Act and other mandates pertinent to cultural resources Appropriate consultation and coordination with the State Historic Preservation Officers concerned should be demonstrated in environmental documents for future project implementation.

26

26 See response to number 25 above

Land Use

Page 30 of the DEIS indicates that Alternative A, the preferred alternative, emphasizes improved water quality, fish and wildlife, recreation, and other amenity values. Page 34 states that Alternative C emphasizes similar values, namely fish and wildlife habitat, wilderness, developed and dispersed recreation, and land acquisition In view of these similarities in emphasis, we are puzzled by the differing recommendations for the wilderness study areas Several areas not recommended for wilderness designation under Alternative A are recommended under Alternative C It would seem that such similarities in emphasis would result in similar recommendations for the wilderness study areas.

27

27 The basic difference between Alternatives A and C is the degree of emphasis Wilderness is emphasized to a lesser degree under Alternative A

Fish and Wildlife Resources

On page 122, Management Indicator Species, we suggest that the golden eagle be included as a management indicator species in the Pike and San Isabel National Forests

28

28 Habitat required by the golden eagle is also required in part by several species which are Management Indicator Species, including peregrine falcon, mule deer, bighorn sheep, mountain bluebird, green-tailed towhee and black-throated gray warbler

On page 124, Threatened and Endangered Species, the bald eagle, a Federally listed endangered species should be included as occurring in the planning area during the migration periods

29

29 The bald eagle does occasionally use portions of the planning area during migration This has been identified in the Threatened and Endangered Species section, Chapter III, FEIS

We suggest Table IV-18 on page 181 be broken down into two tables One table for the number of wildlife structures and the other for the number of fish structures

30

30 This has been done in the FEIS

Wild and Scenic Rivers

The description of the Cimarron River segment included in the Nationwide Rivers Inventory on page 121 of the EIS is in error The entire length of the Cimarron River in the state of Kansas is included in this segment, not just the stretch from the Colorado/Kansas border to the boundary of the National Grasslands This error should be corrected in the final EIS

31

31 This error has been corrected See the Potential Wild and Scenic Rivers section, Chapter III, FEIS

VO-226

FOREST SERVICE RESPONSE

Pages 17 and 18 of the DEIS display eligibility criteria and determinations of eligibility for further suitability analysis for the potential inclusion of three streams into the National Wild and Scenic Rivers System. We concur in the finding on page 17 that the South Platte River from Cheesman Reservoir to Elevenmile Canyon Reservoir is deserving of further study to determine its eligibility for inclusion in the National Wild and Scenic Rivers System

32

32 No response necessary

However, we are concerned that the determination of ineligibility for further study of Badger Creek and the Cimarron River does not follow the joint Interior-Agriculture Final Revised Guidelines for Eligibility, Classification and Management of River Areas (Guidelines). In particular, the determinations made for the following four eligibility criteria shown on page 18 do not follow the quoted statements from the Guidelines

33 The Forest Service determination of ineligibility for further study of Badger Creek and the Cimarron River does follow the joint Interior-Agriculture Final Revised Guidelines for Eligibility, Classification and Management of River Areas. See Appendix F, Final Environmental Impact Statement

1) Free flowing natural condition and, 2) Sufficient volume of water. The Guidelines state that "Flows are sufficient if they sustain or complement the outstandingly remarkable values for which the river would be designated." Also, we are aware of no impoundments along the inventoried elements of the Cimarron River of Badger Creek

33

3) Long enough to provide a meaningful experience. The Guidelines state "There are no specific requirements concerning the length or the flow of an eligible river segment. A river segment is of sufficient length if, when managed as a wild, scenic or recreational river area, the outstandingly remarkable values are protected."

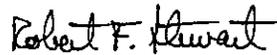
4) Outstandingly remarkable and pleasing to the eye. The Guidelines state that "The determination of whether a river area contains 'outstandingly remarkable' values is a professional judgement on the part of the study team. The basis for the judgment will be documented in the study report." The "study team", as defined in the Guidelines, is to be an interagency group. The determination of presence or absence of the outstandingly remarkable values is to be made by an interagency team, not unilaterally.

There is no data or analysis in the EIS (or Plan) to support a decision to exclude the Cimarron River and Badger Creek from further study to determine their suitability for inclusion in the National Wild and Scenic Rivers System. We believe that they be considered eligible for further study unless and until sufficient and valid reasons are shown why they should not be further studied

34

34 Additional analysis has been prepared and is included in the Forest Plan and FEIS in support of the Forest Service decision on the Cimarron River and Badger Creek. See Appendix F, Final Environmental Impact Statement

Sincerely yours,


Robert F. Stewart
Regional Environmental Officer

VI-227



IN REPLY REFER TO:
Environmental
Quality - 305

Enclosure to Letter F-102
United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
ALBUQUERQUE AREA OFFICE
P O BOX 8327
ALBUQUERQUE NEW MEXICO 87198

FOREST SERVICE RESPONSE

DEC 01 1982

Memorandum

To State Director, Bureau of Land Management, Colorado
From Chief, Division of Resource Development and Protection
Subject Review of Spanish Peaks, Greenhorn Mountain, Buffalo Peaks and Sangre de Cristo Wilderness Study Area Reports, Pike, San Isabel and Rio Grande National Forests, Colorado (ER 82/1656)

No response necessary

We have reviewed the above noted environmental documents and note that the proposed actions will not directly affect any Indian lands over which the Secretary of the Interior exercises a trust responsibility. The documents appear generally well prepared, complete and support the conclusions drawn.

We appreciate the opportunity to review the documents

Barry W. Welch
Chief, Division of Resource
Development and Protection

VI-228

82 FEB 10 AM

9 11 11

Benjamin W Kettle, D.V.M.
Elizabeth R. Kettle
Westcliffe, Colorado
Phone 783-2455
Area Code 303

LETTER F-140



San Isabel Ranch
Westcliffe, Colorado
Phone 783-2455
Area Code 303

FOREST SERVICE RESPONSE

Dec 6, 1982

Mr. Bruce H Morgan, Supervisor
Pike + San Isabel Nat'l Forests
1920 Valley Drive
Pueblo, Colo. 81008

Dear Mr. Morgan:

The Custer County Planning Commission held its
monthly meeting last Thursday 12/2/82. The
question was raised as to the stance we should
take concerning your proposed wilderness area designation
involving the national forest adjacent to Custer County.

I, as chairman of the Custer Co. Planning Commission,
was requested to register a unanimous protest to this
proposal and was also asked to let you know that
the Custer County Commissioners unanimously support us.

We feel the present status of the forest in our
area is as good as we can expect. The administrative
problems you currently have are enough since
your budget is limited. We believe a wilderness
area designation is absurd because we see no
way you could have adequate personnel to
administrate the additional restrictions.

The multiple use concept still serves the best
interests of the majority.

Sincerely,
Benjamin W Kettle
Ch. of Custer Co. Planning Commission

VI-229

1
2

1 We have included your opposing view as well as the opposing view of the Custer County Commissioners to Wilderness designation for the Sangre de Cristo Wilderness Study Area in the planning record.

2 The Colorado Wilderness Act of 1980 requires the Forest Service to conduct a study and to make a recommendation as to the suitability or unsuitability of the Sangre de Cristo Wilderness Study Area for inclusion in the National Wilderness Preservation System. Budget requirements to administer and manage all National Forest System lands are provided by Congressional appropriation



United States
Department of
Agriculture

LETTER F-221

Office of
the Secretary

Office of
Minority Affairs

Washington, D C
20250

FOREST SERVICE RESPONSE

DEC 9 1982

SUBJECT Review of the Environmental Impact Statement of the Pike
and San Isabel National Forests and the Comanche and
Cimarron National Grasslands

TO Bruce H. Morgan
Forest Supervisor

THRU: R. Max Peterson, Chief
Forest Service

We have reviewed the subject environmental impact statement as required
by the USDA Secretary's Memorandum No 1662, Supplement 8 and commend
you for a comprehensive and analytical evaluation.

As a result of our review, we offer the following comments for your
consideration. You indicate concern regarding the unstable nature of
employment in certain sectors as a result of seasonal fluctuations.
You mention, also, several human resource development programs aimed
at accomplishing resource activities providing employment training and
development programs. You have cited figures pertaining to past and
total populations including age, distributions, income, and distributive
expenditures. You have projected numbers of persons, involved in
training (both youth and seniors) in such programs as the Youth Conser-
vation Corps (YCC), Young Adult Conservation Corps (YACC), Senior Citizen
Service Employment Program (SCSEP), College Work Study Program (CWSP),
as well as Volunteers.

It appears, however, that you have neither enumerated the racial composition
of the minority populations nor identified the geographic locations of
the minorities (women, handicapped, and seniors) potentially affected. You
have dealt quite thoroughly with population changes and growth but have not
presented these data breakouts by ethnic groups, numerical changes, actual
participation rates, etc.

1

We shall look forward to receiving your final statement incorporating
these data more explicitly.

ISIDORO RODRIGUEZ
Director

- 1 Demographic data is available in the planning records in the
detailed description of Human Resource Units. Racial composition
and details of minority locations was not provided in the Plan and
EIS because during analysis this information had no effect on
alternatives and was not affected by alternatives. Reference to
racial composition of minority populations and geographic locations
of minority groups information have been added in the Forest Plan
and EIS.

VI-230



DEPARTMENT OF ADMINISTRATION
DIVISION OF THE BUDGET

JOHN CARLIN
Governor
LYNN MUCHMORE,
Director of the Budget

December 12, 1982

Room 152-E
State Capitol Building
Topeka, Kansas 66612
(913) 296-2436

FOREST SERVICE RESPONSE

Mr. Bruce H. Morgan
Forest Supervisor
USDA
Forest Service
Pike & San Isabel National Forests
1920 Valley Drive
Pueblo, Colorado 81008

SAI: KS820908-003
REF: DEIS - Pike & San
Isabel National
Forest; Comanche
& Cimmaron
National Grass-
lands

Dear Mr. Morgan:

The above referenced project has been processed by the Division of the Budget under its clearinghouse responsibilities as described in the Federal Office of Management and Budget Circular A-95.

No response necessary

After review by interested state agencies, it has been found that the proposed project does not adversely affect state plans. Enclosed are comments concerning this project for your information and referral.

If you need any additional clarification or information regarding the state clearinghouse's action please contact this office.

Sincerely,

LYNN MUCHMORE
Director of the Budget

By: *Alan D. Conroy*
Alan D. Conroy
A-95 Coordinator

LM:ADC:sr
Enclosures

VI-231

Enclosure to Letter F-256
STATE AGENCY A-95 TRANSMITTAL FORM

Return to: Division of the Budget, Department of Administration, 1st Floor,
Capitol Building, Topeka, Kansas 66612

FOREST SERVICE RESPONSE

PROJECT TITLE: Draft Environmental Impact Statement
Pike & San Isabel National Forests; Comanche & Cimarron National Grasslands

Notification of Intent
 Preapplication
 Final Application

DATE REVIEW PROCESS STARTED	DATE REVIEW PROCESS ENDED	SAI NUMBER
9-8-82	9-22-82	KS820908-003

PART I Initial Project Notification Review (To be completed by Clearinghouse):

The attached project has been submitted to the State Clearinghouse under the provisions of the Federal OMB Circular A-95 revised. This form provides notification and opportunity for review of this project to the agencies checked below. Please fill in Part II and Part III below and return to the State Clearinghouse.

Return by _____
 Expedite
 Add. Info. Avail.

REVIEW AGENCIES

- | | |
|--|--|
| <input type="checkbox"/> Aging | <input type="checkbox"/> Human Resources |
| <input type="checkbox"/> Agriculture - DWR | <input type="checkbox"/> Kansas Corporation Commission |
| <input type="checkbox"/> Civil Rights Commission | <input checked="" type="checkbox"/> Park and Resources Authority |
| <input type="checkbox"/> Economic Development | <input type="checkbox"/> Social and Rehabilitation Services |
| <input type="checkbox"/> Education | <input type="checkbox"/> State Conservation Commission |
| <input checked="" type="checkbox"/> Fish and Game Commission | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Health and Environment | <input checked="" type="checkbox"/> Water Office, Kansas |
| <input checked="" type="checkbox"/> Historical Society | <input type="checkbox"/> |

No response necessary.

PART II Nature of Agency review comments (To be completed by review agency and returned to CH)

Check one or more appropriate boxes. Indicate comments below. Attach additional sheet if necessary or use reverse side.

Request clarification or additional info. Suggestions for improving project proposal

COMMENTS:
*All comments were transmitted directly to the Forest Svc.
A copy is attached for your information*

PART III Recommended State Clearinghouse Action (To be completed by review agency and returned to Clearinghouse):

- Check one box only:
- Clearance of the project should be granted
 Clearance of the project should be delayed until the issues or questions have been clarified by the Applicant
 Clearance of the project should not be delayed but the Applicant should (in the final application) address or clarify the questions or concerns indicated above
 Request the opportunity to review the final application prior to submission to the federal funding agency

Reviewer's Name	Div./Agency	Date
<i>Robert D. Wood</i>	<i>Ks Fish & Game</i>	<i>12-1-82</i>

Kansas Fish & Game

BOX 54A RURAL ROUTE 2 PRATT KANSAS 67124
(316) 672 5911

Enclosure to Letter F-256
REGIONAL OFFICES

Northwest Regional Office
Rt-2 183 Bypass
Hays Kansas 67801

Northcentral Regional Office
Box 489 511 Cedar
Concordia, Kansas 66901

Northwest Regional Office
3309 S W 29th Street
Topeka, Kansas 66614

Southwest Regional Office
808 Highway 58
Dodge City Kansas 67801

Southcentral Regional Office
Box 764 204 West Sixth
Newton Kansas 67114

Southeast Regional Office
222 West Main Building
Suite C & D
Chanute Kansas 66720

FOREST SERVICE RESPONSE

November 17, 1982

B. Bob Butler

Mr Craig W. Rupp
Regional Forester
USDA Forest Service, Rocky Mountain Region
11177 West 8th Ave.
Lakewood, CO 80225

Dear Mr. Rupp:

In reference to the draft environmental impact statement for the Pike and San Isabel National Forest, Comanche and Cimarron National Grasslands, the following are concerns I wish to express. Because my area of concern is the Cimarron National Grasslands, my statements will be directed only to this one area.

Although it appears that there will be little change in the overall management of the Grasslands, there are several general statements which deserve comment.

The first item I wish to discuss is the general statements on increasing timber cutting and fuelwood production in the national forest. I doubt there is any push to timber cottonwood stands as there is little if any market for the lumber. This was eluded to on page 55, Table II of the DEIS. However, because of the generality of statements in the DEIS, it becomes important to mention it.

Riparian stands of timber are rare in Kansas, and when present, supply a great deal of cover for wildlife species of both game and non-game. For this reason, these areas should be given special consideration before cutting should be allowed. As mentioned previously, I don't believe this is being considered for the Grasslands, so this is all I will say on this subject.

The next item of interest is that of fuelwood production. As mentioned before, riparian timber is important to our wildlife resource on the Cimarron National Grasslands. This includes both live as well as dead cottonwoods. Fuelwood has become important due to high fuel costs in Kansas as well as Colorado. Because of this, our limited timber stands will be taxed to the limit. Again, special consideration should be given these cottonwood stands before large amounts of fuelwood permits are issued.

Oil and gas are important commodities of southwest Kansas and supply much to the economy of Morton County. For this reason, I am not advocating the restriction of development of these resources. However, over the past few years, development has been tremendous

- 1 Timber harvest on the National Grasslands is not planned. The Management Area Prescriptions (Prescriptions 6B, 9A and 10A, Chapter III, Forest Plan) allocated to the Cimarron National Grassland emphasize management for livestock grazing, riparian areas and Research Natural Areas. Vegetation treatment measures necessary to regenerate or perpetuate tree stands will occur where required.
- 2 Management Area Prescription 9A, (Emphasis in on Riparian Area Management) has been allocated to all riparian areas on the Grasslands and provides management requirements which protect riparian values. See Prescriptions for Management Areas, Chapter III, Forest Plan.
- 3 See response number 1 above. The Forest Service will not plan any fuelwood sales on the Grasslands.

VI-233

FOREST SERVICE RESPONSE

and has affected, both directly and indirectly, the wildlife resource of the Cimarron Grasslands.

I realize that at the present time the mineral rights of the area are still in the possession of private individuals. This makes it difficult to have any control over how many or where these wells will be placed on the Grasslands. It is my understanding that these rights revert back to the government in 1985 or 1987. At that time, I believe more planning should be used in the placement of any new wells.

My concern over the placement of new wells is more one of access roads rather than actual damage created by the drill site itself. Over the past few years a tremendous amount of trails have been created due to the oil and gas development. These trails are either direct connections to well sites or trails stemming off well roads that have pushed farther and farther into previously non-accessible areas. I believe this increased vehicular access has had a negative impact on our wildlife resource due to wildlife harassment during critical periods of the year.

This leads to a discussion of item IXa on page 14 of the summary of the DEIS concerning increasing access for recreation on government lands. As mentioned, there is already a large network of trails and roads on the Cimarron Grasslands. There are few places left that are only accessible by foot. I do not believe any further roads are needed for recreational purposes on this particular Grasslands. I further suggest that vehicular traffic be restricted to established trails except for work related activities, such as care of livestock or wildlife habitat construction. Furthermore, off road recreation vehicles should be restricted to designated areas and to the river channel only. This would save on harassment of wildlife and livestock and deter the destruction of the aesthetic value of the Grasslands.

The final item I wish to discuss is that which is mentioned in UIIa on page 13 of the summary concerning land exchange. Although I am sure it would make the management of the Cimarron Grasslands easier if all acreage were contiguous, I do not believe it would be better for the wildlife resource of Kansas. As is obvious by land use maps, most of the land not under government control has been broken out for agricultural purposes. I am confident that if these small acreages were exchanged for contiguous areas they would be broken out for wheat or sorghum production. Because today's farming practices stress clean farming, these small areas are like oasis in the middle of a large agricultural desert. These small areas supply much of the survival needs of many wildlife species that would be unable to exist if these few remaining areas of grass were put to the plow.

On page 146, paragraph 3 of the DEIS, a statement was made that I am not in complete agreement with. In this statement, you have stated that sandy soil is favorable to cultivation. Although with

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4 Ownership of some of the mineral rights will revert to the Federal Government in the next few years. Spacing of oil and gas wells is determined by law or regulation. The Forest Service has only limited authority to change the spacing.

5 We share your concern about roads and traffic. The Plan provides management requirements that keep roads to a minimum and in some cases close roads seasonally or permanently. See Chapter III, Management Requirements, Forest Plan.

6 We agree that there are sufficient roads existing on the Cimarron National Grassland. The statement you refer to on page 14 of the Summary is in relation to the two National Forests and the two National Grasslands in total and is most applicable to the National Forests.

7 Forest-wide direction in Chapter III of the Forest Plan provides for seasonal closures or permanent closure of roads for several reasons including wildlife needs.

8 We agree with you. Forest-wide direction in Chapter III, Forest Plan, for National Grasslands lists management of wildlife habitat as one of the uses for demonstration of sound land conservation and utilization. Other direction in Chapter III, Forest Plan, states that lands classified for disposal in National Grasslands must offer no opportunity to meet demonstration objectives.

VI-234

Mr. Craig W. Rupp
Page 3
November 17, 1982

Enclosure to Letter F-256

current farming practices the local farmers have been able to produce exceptional crops off these type soils, it comes to mind that these soils are also low in fertility, very unstable and very vulnerable to erosion. This is more true for the areas of Vona-Tivoli association and to a lesser extent in the Dalhart-Richfield association. If rainfall decreases to that of the early thirties, then I fear extreme erosion damage could result.

9

I appreciate the opportunity to comment on this DEIS and offer my assistance in the future.

Sincerely,



Mark Sexson
District Wildlife Biologist
S. Star Route, Garden City, KS 67846

MS:ck

cc: Joe Kramer
Bob Wood

VI-235

FOREST SERVICE RESPONSE

- 9 We agree with you and have modified the statement to reflect your concerns See the SOILS section, Chapter III, FEIS

Return to: Division of the Budget, Department of Administration, 1st Floor,
Capitol Building, Topeka, Kansas 66612

FOREST SERVICE RESPONSE

PROJECT TITLE: Draft Environmental Impact Statement Pike & San Isabel National Forests; Comanche & Cimarron National Grasslands		<input type="checkbox"/> Notification of Intent
		<input type="checkbox"/> Preapplication
		<input checked="" type="checkbox"/> Final Application
DATE REVIEW PROCESS STARTED	DATE REVIEW PROCESS ENDED	SAI NUMBER
9-8-82	10-5-82	KS820908-003

PART I Initial Project Notification Review (To be completed by Clearinghouse):

The attached project has been submitted to the State Clearinghouse under the provisions of the Federal OMB Circular A-95 revised. This form provides notification and opportunity for review of this project to the agencies checked below. Please fill in Part II and Part III below and return to the State Clearinghouse.

- Return by _____
 Expedite
 Add. Info. Avail.

REVIEW AGENCIES

- | | |
|--|--|
| <input type="checkbox"/> Aging | <input type="checkbox"/> Human Resources |
| <input type="checkbox"/> Agriculture - DWR | <input type="checkbox"/> Kansas Corporation Commission |
| <input type="checkbox"/> Civil Rights Commission | <input checked="" type="checkbox"/> Park and Resources Authority |
| <input type="checkbox"/> Economic Development | <input type="checkbox"/> Social and Rehabilitation Services |
| <input type="checkbox"/> Education | <input type="checkbox"/> State Conservation Commission |
| <input checked="" type="checkbox"/> Fish and Game Commission | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Health and Environment | <input checked="" type="checkbox"/> Water Office, Kansas |
| <input checked="" type="checkbox"/> Historical Society | <input type="checkbox"/> |

PART II Nature of Agency review comments (To be completed by review agency and returned to CH)

Check one or more appropriate boxes. Indicate comments below. Attach additional sheet if necessary or use reverse side.

- Request clarification or additional info. Suggestions for improving project proposal

COMMENTS:

It is a well-understood fact that there is vital need for new sources of energy within our own nation's boundaries to relieve our dependence on foreign imports. Both the Draft Environmental Impact Statement and the Proposed Management plan has emphasized this fact, however to offer the vast majority of recreation lands (once set aside for preservation) to exploration with 78% to 84% surface occupancy appears to be an extreme penalty to pay to

PART III Recommended State Clearinghouse Action (To be completed by review agency and returned to Clearinghouse):

Check one box only:

- Clearance of the project should be granted
- Clearance of the project should be delayed until the issues or questions have been clarified by the Applicant
- Clearance of the project should not be delayed but the Applicant should (in the final application) address or clarify the questions or concerns indicated above
- Request the opportunity to review the final application prior to submission to the federal funding agency

Reviewer's Name	Div./Agency	Date
Wayne Herndon	Planning - Ks Park Authority	9-27-82

- 10 The amount of surface occupancy allowed in the Forest Plan is of little difference to what is currently permitted. The National Forests and National Grasslands are managed for many uses, one of which is products from natural energy deposits

10

FOREST SERVICE RESPONSE

accomplish this goal.

With due consideration to the economic benefits that may be derived from adoption of the proposed management plan, there is reason to believe that massive degradation of these areas will occur. Although the plan assures long-term, strict management practices, historically federal monitoring programs have been unsuccessful in achieving the original goals outlined or proposed. Federal "monitoring", to date, has consisted of a sophisticated system of keeping expensive records of violations or overproduction on federally-controlled lands with "little or no" action taken to correct the problems created.

The question is; "What assurances may we expect from the federal government that similar problems will not occur as a result of this particular proposed management plan?"

11
12
13

- 11 Oil and gas fields on the Cimarron National Grassland are an excellent example of good site rehabilitation, thus demonstrating site degradation does not have to occur
- 12 Production records are kept by Department of Interior agencies. The Forest Service is responsible for insuring that surface management and rehabilitation is implemented
- 13 See the Minerals section of Forest-wide Direction in Chapter III, Forest Plan Implementation of the management requirements in the Forest Plan will prevent site degradation

Return to: Division of the Budget, Department of Administration, 1st Floor,
 Capitol Building, Topeka, Kansas 66612

FOREST SERVICE RESPONSE

PROJECT TITLE: Draft Environmental Impact Statement Notification of Intent
 Pike & San Isabel National Forests; Comanche & Cimarron Preapplication
 National Grasslands Final Application

DATE REVIEW PROCESS STARTED 9-8-82	DATE REVIEW PROCESS ENDED 9-23-82	SAI NUMBER KS820908-003
---------------------------------------	--------------------------------------	----------------------------

PART I Initial Project Notification Review (To be completed by Clearinghouse):

The attached project has been submitted to the State Clearinghouse under the provisions of the Federal OMB Circular A-95 revised. This form provides notification and opportunity for review of this project to the agencies checked below. Please fill in Part II and Part III below and return to the State Clearinghouse.

Return by _____
 Expedite
 Add. Info. Avail.

REVIEW AGENCIES

- | | |
|--|--|
| <input type="checkbox"/> Aging | <input type="checkbox"/> Human Resources |
| <input type="checkbox"/> Agriculture - DWR | <input type="checkbox"/> Kansas Corporation Commission |
| <input type="checkbox"/> Civil Rights Commission | <input checked="" type="checkbox"/> Park and Resources Authority |
| <input type="checkbox"/> Economic Development | <input type="checkbox"/> Social and Rehabilitation Services |
| <input type="checkbox"/> Education | <input type="checkbox"/> State Conservation Commission |
| <input checked="" type="checkbox"/> Fish and Game Commission | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Health and Environment | <input checked="" type="checkbox"/> Water Office, Kansas |
| <input checked="" type="checkbox"/> Historical Society | <input type="checkbox"/> |

RECEIVED
 SEP 14 1982
 DIVISION OF BUDGET
 STATE OF KANSAS

No response necessary

PART II Nature of Agency review comments (To be completed by review agency and returned to CR)

Check one or more appropriate boxes. Indicate comments below. Attach additional sheet if necessary or use reverse side.
 Request clarification or additional info. Suggestions for improving project proposal

COMMENTS:
 This EIS has adequately addressed our concerns about cultural resources located on Forest Service lands in Kansas.

PART III Recommended State Clearinghouse Action (To be completed by review agency and returned to Clearinghouse):

- Check one box only:
- Clearance of the project should be granted Clearance of the project should not be delayed but the Applicant should (in the final application) address or clarify the questions or concerns indicated above
- Clearance of the project should be delayed until the issues or questions have been clarified by the Applicant Request the opportunity to review the final application prior to submission to the federal funding agency

Reviewer's Name <i>Richard D. Penkatz</i>	Div./Agency <i>Historical Society</i>	Date <i>9-13-82</i>
--	--	------------------------

LAKE COUNTY PLANNING COMMISSION
COURT HOUSE — LEADVILLE, COLORADO 80461

FOREST SERVICE RESPONSE

December 14, 1982

U. S. Forest Service
Pike-San Isabel National Forests
970 Highway 50 West
Pueblo, Colorado 81008

Attn. Mr Bruce Morgan, Supervisor

Dear Mr. Morgan:

In response to the proposed Land and Resource Management Plan for the timber harvest level in Lake County, the Lake County Planning Commission strongly opposes the timber harvest plan scheduled for the next ten years and feels that the complete harvest concept would be detrimental not only to the esthetics but the social and economic stability of Lake County

Apparently the only consideration given by the U. S. Forest Service was the benefits the Front Range would receive, with no consideration given to the communities directly involved with such a plan. The justification given, by your department, for such a harvest is for an increased water yield, which is so negligible it would not benefit any area, commercial timber, improved wildlife habitats and recreation. Such a plan could actually endanger wildlife and eliminate a large portion of good cross skiing, hiking, hunting and camping areas in the Lake County area.

The Lake County Planning Commission feels that these proposals far exceed good forest management practices and procedures and we hereby request that the U. S. Forest Service reevaluate the management plan for timber harvest in Lake County.

After due consideration and review, the Lake County Planning Commission objects on the grounds that the proposals are inconsistent and incompatible with the Lake County Comprehensive Master Plan

Very truly yours,

Bernard Pacheco
Bernard Pacheco, Chairman
Lake County Planning Commission

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cc District Ranger Eide
County Commissioners
File

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1 Public and agency comments on the Proposed Forest Plan resulted in our reanalysis of the timber program for Lake County. As a result the Forest Plan has been revised to insure compatibility with the Lake County Comprehensive Master Plan. The planned timber program in the Leadville area has been reduced by nearly 50% with those Management Areas proposed for increased water yield changed to Management Area Prescriptions emphasizing dispersed recreation opportunities and esthetics which also benefits wildlife. See Prescriptions for Management Areas, Chapter III, and the Management Area Map, Forest Plan, and Changes Between the Draft and Final EIS, Chapter I, FEIS

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Commissioners
Carl Miller, Chairman
Charles W. Weber
William J. Gregory

Attorney
John W. Dunn



FOREST SERVICE RESPONSE

December 10, 1982

Forest Supervisor
Pike & SanIsabel National Forest
1920 Valley Drive
Pueblo, Colorado 81008

Dear Mr. Morgan:

In our April 21, 1982 letter to you we indicated our total opposition to the timber harvest level you projected for the Leadville District. Our opposition at the time was based on preliminary information that your Leadville District Ranger provided since the proposed Land and Resource Management Plan and associated Environmental Impact Statement was still in the preparation phase.

Now that we have had an opportunity to review your Land and Resource Plan we are in total opposition to the basic premise of this Plan as it relates to Lake County. Your Land and Resource Plan is in direct conflict with the Comprehensive Plan prepared for Lake County in 1977 by the Upper Arkansas Area and Council of Governments. With seventy-four (74) percent of Lake County in Federal ownership you would think that a Federal Agency (Forest Service sixty-five (65) percent of the Federal ownership) preparing a comprehensive land management plan for its land would produce a plan that would be very similar in matching the County objectives. Please note page 11-16 (copy attached) of our Comprehensive Plan with particular emphasis on the goal statement.

Our current mineral based economy must be diversified. This Board, the community and, our citizens have held a series of meetings and workshops (some with outside development experts) to determine our options to diversify. Invariably the result is that our best option is to diversify into the recreation/tourism based economy. Thus the goal set in 1977 "---to insure the quality of recreational experience in the County as a whole" is ever so important today. We intend to show you just a few examples of where your Land and Resource Management Plan is in conflict with this goal.

1. Ski Cooper: During the 1981-82 ski season, Steve Kerschen, the area manager, conducted an extensive survey to determine what draws people to Ski Cooper. One of the main drawing cards is the outstanding view from the ski trails of the area. Now, consider that in Appendix C of your Plan there is a total of 1451 acres (10,300MBF) to be clearcut in the West Tennessee,

- 1 The Forest Plan has been revised to insure compatibility with the Lake County Comprehensive Master Plan. The Pike and San Isabel National Forests Land and Resource Management Plan does provide management requirements that protect the environment, insure the quality of recreational experience opportunities, provide for vegetation management, maintain wildlife migration routes and wintering areas, protect riparian areas, provide for public accessibility and use of National Forest System lands and provide opportunities for recreational developments to serve public needs. See Forest Plan, Chapter III, MANAGEMENT DIRECTION. See response number 1 to letter number F-285, Lake County Planning Commission commenting on the Proposed Forest Plan.

- 2 Management Area Prescriptions in Lake County that emphasize commercial timber harvest designed for increased water yield have been removed and have been replaced with prescriptions that emphasize recreation opportunities. See the Forest Plan Map and Appendix G, in the FEIS for these prescription changes. Planned timber harvest in the West Tennessee area has been reduced to a total of 2,000 MBF in timber sales scheduled in 1990 and 1991. See Appendix A, Timber Sale Summary, Forest Plan.

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9B Management Area. All of which is in the direct view from the ski runs of Ski Cooper!

FOREST SERVICE RESPONSE

- 2. Cross Country Ski Trails. The major Forest Service operated ski trails in Lake County are located in the West Tennessee Area. These trails are extremely popular and draw people from distant States because of the excellent snow conditions and "outstanding" natural beauty. Local business is advertising these trails (one example is included) across this Nation. The book titled Colorado Ski Country USA, which is distributed widely throughout the United States, provides information on these cross country ski trails in its information on Ski Cooper. We do not believe that the extensive cutting and associated road construction (whether these be permanent or temporary roads) is compatible with the winter sports emphasis being developed in the northwest portion of Lake County. Local business and sports organizations are currently attempting to emphasize the use of these trails to an even greater extent.
- 3. Travel Industry: Our proximity to the I-70 corridor, Aspen, Vail and the Dillon area and, our area of outstanding scenic beauty generates considerable activity in the travel for sight-seeing business. Our business community is going through considerable effort to expand this activity.

3 The reanalysis of the Plan resulted in changing the West Tennessee area to timber harvesting prescriptions that are more compatible with dispersed recreation activities such as cross-country skiing, hiking and backpacking

Now, consider that the bulk of the timbered land on slopes 40 percent and less within Lake County are in direct view of U. S. Highway 24 (Buena Vista to I-70 at Vail), 91 (Leadville to I-70 at Copper Mountain) and, 82 (Twin Lakes to Aspen over Independence Pass). We need to use only Mt. Zion as an example to make our point because almost any harvest activity on its slopes will be seen from Highway 24 and some from downtown Leadville. Appendix C of your Plan calls for harvesting 984 acres (mostly clearcutting) in the years 1986-1990!

4 The reanalysis of the proposed Plan resulted in changing all of the 9B Management Prescription Areas, with emphasis on increased water yield through vegetation manipulation, within Lake County to management prescriptions which emphasize recreation opportunities. This resulted in a significant reduction in the timber harvest level from the proposed 4.8 MBF to 1.8 MBF per year. The 9B Management Prescription emphasized harvesting the spruce/fir and lodgepole pine types using the clearcut method in order to achieve the desired water yields. The prescriptions with a recreation emphasis allow the use of the clearcut, shelterwood or selection harvest methods, and require less vegetation manipulation to meet their objectives.

- 4. Backpacking and Trail Hiking: Mt. Elbert and the other fourteeners and the Forest Service trail network draw people to this County from all over the United States and foreign countries to climb and in other ways use. Our business community is gearing to service this activity and encouraging its increase

Now, consider that from almost any point on the east side of the Continental Divide within Lake County you overlook the bulk of the Timbered lands on slopes of 40 percent and less. Appendix C calls for cutting (mostly clearcutting) 6,658 acres (32,940 MBF) in the years 1983-1990 from these slopes of 40 percent and less.

These changes reduce the scale of vegetation management in the visual sensitive areas of highway corridors and within the viewsheds of trails, high mountain peaks and developed recreation sites. The use of the clearcut, shelterwood or selection harvest method will depend, in part, upon which method will meet the need of the visual management objective for specific projects. In the example of Mt. Zion, the proposed harvest would have created a total of 984 acres of mostly clearcuts in the ten year period. This has been reduced to approximately 380 acres to be cut in 10 years using a variety of cutting methods. The harvest units on Mt. Zion will be designed realizing that the view from Highway 24, and trails and mountain peaks within the Holy Cross Wilderness is of critical concern.

We feel that the water yield premise needs some discussion because it is the apparent reason that the timber harvest level has increased 1800 percent over the 250 MBF scheduled in the Upper Arkansas Land Management Plan and the 797 percent increase over the 765 MBF the Leadville District sold in FY82. According to Donald Shroyer and the others from Lake County who met with you on December 7, the projected water yield is rather small. If this is true then we question the need to raise the harvest level. Again, keep in mind the objective of this County relating to recreation opportunity and then consider the General Direction in the 9B Management Area; "Resolve conflicts between water quality/quantity and resources in favor of water!" Some of the prime recreation opportunity resources within Lake County can be resolved

right down the drain by specified direction in your plan!

Accordingly to the local Division of Wildlife Officer and other citizens in this County (one with a Wildlife Management Degree) the proposed harvest level will have a devastating adverse impact on our local elk herds. This would be in direct conflict with another premise of your proposed Plan of improving the wildlife habitat.

Your Environmental Impact Statement makes a play on the benefits the County Treasury will gain from the 25 percent of the receipts they will receive from the sale of timber. Yes, the County will receive 25 percent but in 1982 these funds were SUBTRACTED from our payment in lieu of taxes (PILT) entitlement --- we didn't gain one dime!

The above are just a few of our concerns and examples of how your proposed Land and Resource Plan is in direct conflict with our Comprehensive Plan and in other ways adversely affect the business community and citizens of Lake County. Now we will offer suggestions (request) that you can make for your final plan that we believe will satisfy us and enable you to effectively manage the National Forest for our mutual benefit.

- 1. Reduce the timber harvest to the FY82 level which, according to your Leadville office records, was 765 MBF total volume sold.

This provides the critical need for fuelwood that a large number of citizens of Lake County depend upon as a primary heating fuel. According to the local Division of Wildlife Officer this is a much more realistic level to meet wildlife habitat improvement purposes. By our observations of past management activity and thorough knowledge of the forested lands within Lake County we feel this level is compatible with our recreation emphasis for the County.

- 2. Delete all 9B Management Areas within Lake County, change the West Tennessee and South Fork of Lake Creek 9B areas to 2A (Recreation - Semiprimitive Motorized). Change the 9B area West of Turquoise Lake to 3A (Recreation - Semiprimitive Nonmotorized).

These changes would put the subject lands into a classification that is compatible with our Comprehensive Plan and we believe allow proper management to meet Forest Services objectives.

- 3. Include the 1B (Recreation - Downhill Skiing) Management Area known as Quail Mountain in your final plan.

This designation will preserve the option for considering a ski area development proposal. We recognize that considerable more study of the area is required to determine the actual feasibility of the National Forest and private lands to support a ski area development.

FOREST SERVICE RESPONSE

5 The proposed timber harvest level in Lake County has been reduced significantly. In 4B and 5B Management Areas, where wildlife resources are emphasized, habitats will be managed to improve wildlife conditions, utilizing vegetation treatments where necessary.

6 By statute, the predominant authority being the Act of May 23, 1908 as amended (16 USC, 500), States receive from the Department of Agriculture, 25 percent of gross receipts from National Forest System lands generated from the sale of Forest products or use of recreation facilities. Another authority, the Payment In-Lieu-of Taxes Act of 1976 (31 Stat 1601) compensates States and local governments for lost tax revenues because of Federal land within their area. The Department of Agriculture does not administer the Payment In-Lieu-of Taxes Act, thus, has no control as to whether the 25 percent share of gross receipts is treated as a credit when the Payment In-Lieu-of Taxes fund is distributed to states and local governments.

7 Analysis of the Management Prescription Areas indicates that a harvest level of 1.8 MBF per year for the Leadville Ranger District is necessary to achieve the desired future condition of the Forest. The important future conditions of the Forest within Lake County are insect and disease resistance for lodgepole pine, diverse wildlife habitat with a particular need to increase the suitability of deer and elk winter habitat, and maintain a visually attractive and diverse landscape. The Fiscal Year 82 harvest level of 765 MBF, if continued, would not achieve these desired future conditions within a reasonable time frame.

Comments received on the Proposed Forest Plan resulted in a re-analysis of the timber program for Lake County. As a result, the Plan has been revised to insure compatibility with the Lake County Comprehensive Master Plan. The timber program has been reduced by 50%. These changes place more emphasis on the recreation, visual and wildlife resources of Lake County and are compatible with the Lake County Master Plan.

8 The revised timber program resulted in all of the 9B Management Areas being changed to Management Area Prescription 2B with emphasis on rural and roaded natural recreation opportunities. The motorized and nonmotorized activities afford a wide range of recreation opportunities and experiences. Management activities maintain or improve the visual quality of the existing recreation experience.

9 An area on the southeast side of Twin Lakes has been allocated to Management Area Prescription 1B-2, thus allowing further study as to its potential for a winter sports site.

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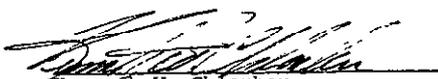
In ending, we want to emphasize that Lake County has the responsibility to its citizens to provide an environmentally sound quality of life. We have the responsibility to provide the opportunity to our business community to diversify and this will require an environmentally sound environment. The Comprehensive Plan for Lake County reflects those responsibilities. We will use every means available to us to have your Land and Resource Plan modified to reflect the needs of Lake County.

FOREST SERVICE RESPONSE

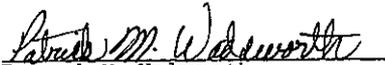
Sincerely yours,



Carl Miller,
Chairman
Lake County Board of Commissioners



Kenneth W. Chlouber,
Commissioner



Patrick M. Wadsworth,
Commissioner

No response necessary

VI-243

Encls: 1

Anticipated Development

No final design for this area has been set since the land is still owned by the Bureau of Reclamation. However, the Forest Service will assume the land around the lakes at a later date. By the end of the summer of 1977 some 200 camping units around the lakes will be completed. More units are anticipated at the existing Parry Peak Campground. Two more boat ramps are also planned for the area.

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At both lakes, once there is a demand there will be permitted a private concessioner for boat rentals, and a private campground with showers, laundry facilities and facilities the USFS does not have.

Map H-30 indicates some of the private recreational facilities in the county. These add to the available public facilities and greatly increase the opportunity for recreation. All these areas are important since tourism and recreation contributes a great deal of the economy of the county. The tourist and recreation industry is attracted to Lake County because of the natural beauty of the environment, the historic character of the county in the opening of the west, and the developing water based recreation opportunities. Hunting, skiing, boating, camping, sightseeing and other recreation activities occur in the county throughout the year and an attractive, productive natural environment is essential for the continuation of these activities.

One of the goals of the county expressed in this plan is the maintenance of the environment in its natural state. Regulation of potential developments in scenic areas is essential to insure the quality of recreational experience in the county as a whole. The county must protect vegetation, wildlife migration routes and wintering areas, stream quality, mountain valleys and slopes, their accessibility and use, as a resource if it wishes to maintain its natural and economic viability as a recreationally attractive entity. Subdivision development might be directed to areas where services can be readily

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FOREST SERVICE RESPONSE

- 10. Effective December 1983, administrative jurisdiction of 6,905 acres of land at Twin Lakes was transferred from the Bureau of Reclamation to the Forest Service. For the past several years, recreation facilities have been constructed around Twin Lakes to provide a variety of recreation opportunities for anticipated use. Management Area Prescriptions allocated to these lands provide management requirements that permit recreational developments. See Management Area Direction, Chapter III, Forest Plan and the Forest Plan Map, and Appendix G, FEIS.

- 11. See response to number 4 above

VI-244

LETTER F-302
CITY OF COLORADO SPRINGS
COLORADO 80947
P O BOX 1103
DEPARTMENT OF PUBLIC UTILITIES
WATER-ELECTRIC-GAS-WASTE WATER

FOREST SERVICE RESPONSE

UTILITIES BUILDING
18 S NEVADA AVE

OFFICE OF THE DIRECTOR

December 15, 1982

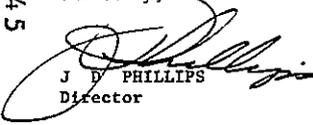
Mr. Bruce H. Morgan
Forest Supervisor
Pike and San Isabel National Forests
1920 Valley Drive
Pueblo, CO 81008

Dear Mr. Morgan

Thank you for the opportunity to comment on the Pike and San Isabel National Forest Land and Resource Management Plan. Please find attached the comments of the City of Colorado Springs for consideration in the final Land and Resource Management Plan

No response necessary

Sincerely,


J D PHILLIPS
Director

JDP jb

enc

VI-245

Enclosure to Letter F-302
COMMENTS BY THE CITY OF COLORADO SPRINGS
TO THE FOREST SERVICE
ON THE LAND AND RESOURCE MANAGEMENT PLAN

FOREST SERVICE RESPONSE

In general, the City of Colorado Springs supports the Forest Service Land and Resource Management Plan. We find this Plan is compatible for the most part with our current operations and hopefully provides the flexibility to enable us to upgrade and/or develop new facilities. There are, however, elements of the Plan that should be addressed as they raise concerns for the utility operations.

The Plan states that one of the goals is to increase water yield by approximately 22,000 acre feet. This is to be done by timber harvesting, vegetative manipulation and structural improvements. The concern of the City is that this additional water, if in fact it is truly additional water, should go for the benefit of the existing water users. We find that population growth pressures in Colorado Springs requiring additional water are the prime determinant for the planning of the Water Division. It is our position that any increased water yield in watersheds in which we derive municipal water is available for the sole use of adjudicated water rights in those watersheds within the priority system. We are concerned that the Forest Service may claim rights outside of the priority system to additional waters made available through the above mentioned watershed management activities. There remains a great deal of subjectivity in determining additional yields through watershed manipulation. The Plan also supports weather modification as a measure to increase water yields, however, the Plan does not propose specific activities nor is there any money budgeted for weather modification.

1. Additional water that is produced as a result of timber harvesting activities and/or structural improvements will flow into adjacent stream channels and be utilized by water users along the streams. The Colorado State water law of prior appropriation, designates who has rights to water once it enters a stream channel. The Forest Service has no plans at this time to claim any additional water that may be produced by Forest management activities.

2. Weather modification proposals are given consideration, however, the Forest Service has no plans of instigating its own weather modification activities. All weather modification proposals will be subject to the NEPA process and environmental analysis. Environmental Assessments or Impact Statements will be required before any projects are permitted. The Forest Service will deal with each proposal on a case-by-case basis.

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FOREST SERVICE RESPONSE

We agree with the Forest Service position that notes storage and transmission facilities associated with water yield increases are compatible with the Plan's direction. We should also note that additional waters may be put into the storage and transmission facilities from sources outside of the Pike-San Isabel National Forest to meet increased water demands for our community. We feel also that the upgrading of facilities to handle additional waters of this nature should be determined compatible with the Plan.

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3 We agree. Each project proposal will be considered individually as they are presented. The NEPA process will require an environmental analysis with either an Environmental Assessment (EA) or an Environmental Impact Statement (EIS).

It is our concern that the Forest Service in applying the "Reservation Principle" to determine and obtain rights to in-stream flow volumes to protect and maintain stream channel stability and capacity is outside of the laws of Colorado as they pertain to water rights. Colorado State law limits the appropriation of in-stream flow rights to the Colorado Water Conservation Board exclusively. It is our position that conditioning the development of water resource projects by requiring in-stream flows is not within the jurisdiction of the Forest Service.

4

4 This point of contention may more than likely be determined by the courts. The Forest Service is applying for instream flows under the Reservation Principle. The U.S. Supreme Court (United States vs. New Mexico, 438 U.S. 696) more commonly known as the Mimbres Decision, held that the National Forests, reserved from the Public Domain under the authority of the Organic Administrative Act of 1897, were reserved to "insure favorable conditions of water flow and to furnish a continuous supply of timber." The Court said that these were the only purposes water was reserved for, and it specifically excluded recreation, esthetics, wildlife preservation, and cattle grazing from the stated purposes.

In-stream flows needed to insure favorable conditions of water flow, a reservation purpose upheld by the Court, will be claimed under the Reservation Principle. The reason for this is that insuring those favorable conditions requires the maintenance of sufficient flows to prevent the accumulation of sediment and debris that would cause unfavorable conditions. These flows are also important to insure the availability of water for firefighting, and the maintenance of riparian vegetation which acts as a fire-break and provides protection to stream banks. This unfavorable condition would develop when a stream energy (that is, the ability to transport its sediment load) is reduced by diversion to a point where gradient, channel form, and scouring and depositional patterns are adversely affected.

The water quality goal of the Plan as it relates to permits issued by the Forest Service should be related to discharges only. The maintenance of water quality by allowing diversions of water where that use is suitable and where conflicts with other resources can be mitigated is an action outside of the laws of the State of Colorado. The stream classifications were developed by the Water Quality Control Commission to specifically relate to stream discharges and where those discharges adversely impact the particular classifications, mitigating measures should be taken. In order to determine the success of the maintenance and improvement of water quality, the Plan proposes to establish baseline stations using the STORET system. The Plan also notes that the degree of precision and reliability is "moderate."

5

5 The Forest Service has a mandate to protect National Forest watersheds by implementing practices designed to retain soil stability, preserve site productivity, secure favorable conditions of stream-flow, and preserve or enhance aquatic values. Our water quality goals relate to all streams and lakes on National Forest System lands rather than just to discharges.

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FOREST SERVICE RESPONSE

The Forest Service also proposes activities in the area of visual resource management. The City agrees with the use of visual quality objectives so long as the maintenance or attainment of those objectives does not impose an adverse economic burden. It should be noted that a "high" degree of precision and reliability is obtained with the Forest Service visual management system. It is our opinion that this is a subjective evaluation contrasted to the objective laboratory testing of water quality which yields only a "moderate" degree of precision and reliability. It is our feeling that the degree of precision and reliability for visual resources is not measured by the same standard as that for water quality.

6

6 The visual management system applies to all management activities on National Forest System lands and is measured by different criteria than that used for other resources. The visual quality objective sets only visual goals. Management goals for other resources may reinforce the visual objective or override that goal.

Mineral activity is another area of concern to the City. The Forest Service notes that mitigating measures for mineral activity will recognize existing uses and protect those uses. It is our position that the mineral lease stipulations better reflect the concerns of the Forest Service by adding to Form 3109-3, Section 3, a clause providing that liability for treatment costs if pollution occurs in watersheds used for municipal purposes should be borne by the applicant to the full extent of the cost. Furthermore, the applicant should bear the burden of proof that such pollution of water did not adversely affect municipal uses.

7

7 The Forest Service will handle leases on a case-by-case basis and leases will stipulate that the leasee will bear full burden of clean-up, if pollution occurs in watersheds used for municipal purposes. The Forest Service is obligated to adhere to state regulation for water quality.

For Forest Service information, the City of Colorado Springs operates several reservoirs on the forest that have been identified for mineral leasing with surface occupancy. They are Montgomery Reservoir, Rampart Reservoir and Rosemont Reservoir. In addition, the City uses the facilities of Turquoise Lake for storage of transmountain water. The Forest Service has also

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8 The Forest Service is aware of the cooperative agreements and will abide by their restrictions. The Forest Service considers mineral lease applications on a case-by-case basis to insure adherence to all laws, regulations and agreements. Special stipulations will require limited or no surface use as required.

8 VI-248

identified areas available for mineral leasing with no surface occupancy within watersheds used by the City including the south and east slopes of Pikes Peak, Severy Creek, Ruxton Creek, Big Tooth Reservoir and the north and south forks of French Creek. It should be noted that many of these drainage areas are covered by cooperative agreements with the Forest Service as stipulated by Congressional action.

8

Colorado Springs, as referenced earlier, has agreements with the Forest Service in which the Forest Service manages their lands in accordance with the regulations applicable to the area within the purpose for which these cooperative agreements or withdrawals were established. The Forest Service notes that special land classifications and withdrawals will not change.

9

However, the Forest Service goes on to say that withdrawals will be reviewed during the first time period of the Plan and periodically thereafter to determine if they are still appropriate. One wonders if the withdrawals or classifications will not change, then why do they need to be reviewed to determine if they are appropriate? It has been determined that the agreements between the City and the Forest Service now in effect contain no provisions for re-negotiation.

The Forest Service identifies that in addition to their traditional recreational activities, they will provide opportunity for private industry, other Federal or local authorities to assure larger share in meeting recreational demand. We feel that this could transfer more responsibility and cost to local governmental entities. Should this occur, compensation should be due from the Forest Service to those governmental entities providing recreational activities commensurate with their costs.

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9 The Federal Land Policy and Management Act of 1976 requires that all withdrawals be reviewed and determined whether, and for how long, the continuation of the existing withdrawal is consistent with the objectives for which the withdrawal was made. Consultation with involved National Forest System users is an integral part of the review process.

10 When a situation arises that would allow the private sector or other public agencies an opportunity to provide recreation activities, the Forest Service will cooperate with interested proponents. The responsibility for providing recreation activities can be transferred to another public agency. This would occur only after full consultation and agreement that providing the recreation activity is the responsibility of and in the best interest of that agency.

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Utility corridors is another area addressed by the Plan in which the City has some concerns. Upon review of the major utility corridors now in existence, the City feels that upgrading any transmission lines along those corridors can be accomplished by using these existing right-of-ways. This holds true both for the Electric Transmission and Distribution Division and the Water Division. For the Water Division, however, a new corridor will probably be needed. Tentative plans anticipate the addition of a hydro-electric facility on the Rampart Reservoir system above the Pine Valley Treatment Plant. Should this occur, a new transmission line and penstock will be needed. Engineering feasibility has indicated a route alternate to the existing pipeline, therefore, the City would need to add an additional utility corridor.

11

FOREST SERVICE RESPONSE

- 11 The Forest Service agrees that existing utility corridors or rights-of-way should be used to their full potential when the need has been identified. When applications for new corridors are received, the Forest Service reviews the proposal with an interdisciplinary team to insure appropriate environmental analysis, and to determine the routing of the corridor, and the terms and conditions (stipulations) for the protection of the environment which are to be included in the Special Use Permit.

PIKES PEAK AREA COUNCIL OF GOVERNMENTS

27 East Vermijo, Colorado Springs, Colorado 80903 (303) 471-7080



FOREST SERVICE RESPONSE

December 14, 1982

Bruce Morgan, Forest Supervisor
Pike and San Isabel Forests
1920 Valley
Pueblo, CO 81008

Dear Mr Morgan,

On November 10, 1982, the Pikes Peak Area Council of Governments reviewed the USDA proposed Land and Resource Management Plan for Pike and San Isabel National Forests and the corresponding Draft Environmental Impact Statement. Formal action was postponed until the December 8, 1982 meeting. At the December meeting, the Council gave favorable comment on the Forest Service Plan with the preference that only the Sangre de Cristo WSA be designated as a Wilderness Area. A copy of the staff comments presented to the Pikes Peak Area Council of Governments are attached

VI-251

During the PPACG discussion on the Proposed Forest Plan, a representative from the City of Colorado Springs Department of Utilities expressed some concerns relevant to the Pikes Peak Region. The PPACG wished that these concerns be included with the overall comments. Hence these concerns are listed below

1 The Forest Service notes through vegetative manipulation, snow fences and weather modification, an increase in water yield of approximately 22,000 acre feet could occur on the forest. In light of the growing population in the areas with and adjacent to the forest, and the attendant increased demand for water, this additional water, if it is truly additional water and not weather variation, is for the benefit of existing water users. The ownership of this water should not accrue to the Forest Service.

1

2 The plan also notes that the Forest Service will determine water needs necessary to manage all resources on the forest through obtaining water rights and objecting where water use will injure the national forest. The plan goes on to note that the use of the "Reservation Principle" to determine and obtain rights to in-stream flow volumes to protect and maintain stream channel stability and capacity will also occur. In light of the recent litigation, the opinion is given, that the Forest Service does not have the right to appropriate in-stream flow volumes of water. Rather, that right is exclusively reserved by State statute to the Water Conservation Board. This opinion also applies to the Forest Service maintaining minimum stream flows consistent with flow needs for management.

2

- 1 Additional water yield resulting from vegetation management is subject to existing Colorado water laws of prior appropriations. Senior water right holders have priority to enough water to fulfill their water right requirements.
- 2 On July 3, 1978 the U S Supreme Court (United States vs. New Mexico, 438 U S 696) in the Mimbres Decision, held that the National Forests, reserved from the Public Domain under the authority of the Organic Administrative Act of 1897, were reserved to "insure favorable conditions of water flow and to furnish a continuous supply of timber." The Court said that these were the only purposes water was reserved for, and it specifically excluded recreation, esthetics, wildlife preservation and cattle grazing from the stated purposes. In-stream flows needed to insure favorable conditions of water flow, a reservation purpose upheld by the Court, will be claimed under the Reservation Principle. The reason for this is that insuring those favorable conditions requires the maintenance of sufficient flows to prevent the accumulation of sediment and debris that would cause unfavorable conditions. These flows are also important to insure the availability of water for firefighting, and the maintenance of riparian vegetation which acts as a firebreak and provides protection to stream banks. This unfavorable condition would develop when a stream energy (that is, the ability to transport its sediment load) is reduced by diversion to a point where gradient, channel form, and scouring and depositional patterns are adversely affected.

Morgan

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12/14/1982

FOREST SERVICE RESPONSE

VI-252

3 At several points in the plan, the Forest Service talks about limiting diversions and releases from reservoirs as well as other man-related flow resources that tend to change equilibrium conditions of channels and adversely effect water quality. Again, the Forest Service has no authority under the State water laws to control the diversion of water.

3

4. The Forest Service also notes that they wish to maintain and improve water quality. The monitoring plan using the STORET system would be implemented. The Forest Service also notes that the degree of precision and reliability is "moderate." At the same time, the Forest Service discusses visual resources and the implementation of visual quality objectives. It is noted that a "high" degree of precision and reliability is obtained with the visual management system. In comparing the two, we find that water quality monitoring is done through sampling and analytical laboratory analysis with a degree of reliability well established. At the same time, the evaluation of visual quality objectives is a subjective evaluation to which no degree of reliability is adequately established.

4

5 In light of PPACG's charge on water quality, and the implementation of the Project Aquarius, it is felt that mitigating measures for mineral activities should recognize municipal use of water. An additional stipulation needs to be added to the mineral lease stipulations. That stipulation should provide for the liability of the leasee for treatment cost if pollution occurs to watersheds used for drinking water purposes and that the leasee shall bear the full cost. Additionally, that leasee should bear the burden of proof that pollution did not occur or that the pollution that occurred is not of a significant economic disadvantage to the water users.

5

6 Mineral leasing with surface occupancy has been identified by the Forest Service for certain areas that are within the drainage areas of municipal watersheds. On Pikes Peak they are the South Suburban system draining Beaver Creek and Gould Creek. Elsewhere on the forest is Montgomery Reservoir at the head waters of the South Platte, Rampart Reservoir on the Front Range and Turquoise Reservoir in Lake County. Mineral leasing with no surface occupancy has been identified in watersheds for municipal use including the south and east slopes of Pikes Peak draining into the Seven Lakes area, Severy Creek, north and south forks of French Creek, Ruxton Creek and the area above Big Tooth Reservoir. In light of the mineral leasing activities, adequate protection for municipal watersheds should occur at the cost of the forest and/or the leasee.

6

3 In future reservoir developments, the Forest Service can require maximum flow limitations if they are warranted to protect the receiving stream channel from erosion. The Forest Service's objective in managing riparian areas is to emphasize the protection, management and improvement of riparian areas during any management activity. The Forest Service must comply with the Floodplain Management and Wetland Protection Orders (EO 11514, 11988 and 11990 of May 24, 1977 as well as requirements of the National Environmental Policy Act of 1969.

4 No response necessary

5 Management requirements in the Forest Plan, Chapter III, Management Direction, provide the necessary standards and guidelines to insure that Federal and State water quality standards will be met. Mitigation measures necessary to maintain and protect water quality will be developed through the NEPA environmental analysis process in all project planning on a case-by-case basis.

6 The lessee is responsible for complying with the Forest Service requirement of meeting Federal and State water quality standards. Operating Plans and Environmental Analysis (Environmental Assessments and Environmental Impact Statements) will specify water quality standards that must be met.

LETTER F-304 continued

Morgan

3

12/14/1982

FOREST SERVICE RESPONSE

Aside from these concerns, it may be noted that the Forest Service Land and Resource Management Plan generally is compatible with the overall regional plans for the Pikes Peak Area. We appreciate the opportunity to comment on the proposed forest Plan. If there are any questions please feel free to call me

Sincerely,



David J. Salamon
Regional Planner

Is

No response necessary

VI-25 3

Enclosure to Letter F-304

PIKES PEAK AREA COUNCIL OF GOVERNMENTS

27 East Vermijo, Colorado Springs, Colorado 80903 (303) 471 7080



November 30, 1982

MEMORANDUM

TO Pikes Peak Area Council of Governments
 FROM David Salamon *DS*
 SUBJECT USDA Forest Service Land and Resource Management Plan
 for Pike and San Isabel National Forest

Since the November PPACG meeting, more staff analysis was given to the proposed Forest Service Plan, including an additional meeting with Forest Service representatives. A clarification was sought for the two major points in question, (1) the reduction in Wilderness Area designation, and (2) the apparent emphasis in mineral development activity. Consequently a different perspective was acquired which permits staff to reverse the original position and hence recommend favorable comment.

Through discussion with Forest Service representatives, it was made clear that the reduction in proposed Wilderness Area designation has occurred for acceptable reasons. For the Sangre de Cristo Wilderness Study Area (WSA), the reduction occurs predominately on the "fringe areas." These outer areas would allow portions of scenic wilderness to be experienced from motorized vehicles by those people who are not fortunate to hike the interior parts. The Buffalo Peaks WSA was not included for Wilderness Area designation because of the close proximity to human settlements. However in this case, the designation is a Management Area defined as "providing for non-motorized recreation in a non-wilderness semiprimitive setting." Most of the Lost Creek area has been preserved as Wilderness Area in the previous 1977 RARE II evaluation. The remaining Lost Creek further planning area non-designation occurs because the present pattern of mixed land use affords no realistic possibility for Wilderness Designation. Furthermore, any non Wilderness Designation does not preclude other Forest Service activities such as providing wildlife habitat needs, forage production and watershed rehabilitation.

Regarding mineral development activity, Forest Service representatives point out that the Plan is in actuality reducing the amount of area available for mineral leasing. Within the body of the Forest Plan a set of more stringent standards and guidelines for environmental protection has also been included. Additionally the Forest Service is required to grant mineral lease permits to all applications which meet the standard requirements. The alarming increase in mineral lease permits contained within the Forest Plan is only an estimate of how many permits

PPACG

2

11/30/1982

the Forest Service anticipates. Hence, the Forest Service has little control over the number of permits granted, if all the guidelines are met. However, each mineral lease permit application does go through a lengthy review process.

Finally, the Land and Resource Management Plan represents the general direction the Forest Service intends to go during the next 50 years. Specific items of conflict or jurisdictional problems can be taken up directly with the Forest Service in a separate process. The Plan is an attempt to increase the level of management for the National Forest which has not previously been displayed.

Staff Recommendation - staff recommends favorable review on the Proposed Forest Service Land and Resource Management Plan for Pike and San Isabel National Forests.

1s

VI-254

PIKES PEAK AREA COUNCIL OF GOVERNMENTS

PIKES PEAK AREA COUNCIL OF GOVERNMENTS

27 E Vermijo, Colorado Springs, Colorado 80903 (303) 471-7080

27 E Vermijo, Colorado Springs Colorado 80903 (303) 471 7080



A-95 CLEARINGHOUSE REVIEW

REQUEST FOR LOCAL COMMENTS FOR CLEARINGHOUSE REVIEW

Date December 12, 1982 PPACG Identifier 82-080

Date 11/23/82 PPACG Identifier 82-080

TO USDA Forest Service

To Mr John Fisher

ADDRESS 1920 Valley Drive, Pueblo, CO 81008

E1 Paso County Land Use

FROM David Salamon, Regional Planner

27 East Vermijo

PROJECT TITLE Proposed Land & Resource Management Plan for Pike and San Isabel National Forests

Colorado Springs, CO 80903

The Pikes Peak Area Council of Governments at its meeting on 12/8/82 voted to forward the following comment(s) on this proposed project

From David Salamon, Regional Planner

[X] Favorable - the project does not appear to conflict with Regional Plans, programs, or objectives.

Project Title Proposed Land and Resource Management Plan for Pike and San Isabel National Forest and Draft EIS

[] Unfavorable, for the following reasons

Applicant USDA Forest Service

[] No Comment

REVIEW DATE December 8, 1982 9:00 a.m

[] No Action, postponed until the next on

To help in the Clearinghouse review process, the PPACG is requesting your agency or jurisdictions comments on this proposed project. A description of the project is attached. Please answer the following questions, if applicable. Make any additional comments in the space provided.

[X] The following comments were made by the PPACG Board

Yes No This project is consistent with the goals, objectives, plans and programs of this agency or jurisdiction

The Board voted 8-1 to send favorable comment on the Forest Service

Yes No There is a need for this project

Plan and to include concerns expressed by the City of Colorado

Yes No This project is the most effective and efficient way to meet the need

Springs. Additionally the Board expressed preference that only the

Yes No There is evidence that this project duplicates an existing program

Sangre de Cristo Wilderness Study Area be given the proposed wilderness designation.

No comments at this time

Copies of the following are attached [X] Local Comments

Additional comments Review and have no comment AT

[X] PPACG Staff Comment

This time

[] Copy sent to State Clearinghouse on

[Signature]

Please forward a copy of this form and local comments with your application to the funding agency

PLEASE KEEP THE PINK COPY FOR YOUR RECORDS AND RETURN THE WHITE AND YELLOW COPIES TO PPACG no later than

(continue comments on back of this form if necessary)

12/8/82

VT
9
R

LETTER F-340

Town of Fairplay 1173

400 Front Street
P.O. Box 262, 17 P1: 27
(303) 836 2622
Fairplay, Colorado 80440

FOREST SERVICE RESPONSE

December 13, 1982

The Forest Supervisor
Pike San Isabel National Forest
1920 Valley Drive
Pueblo, Colorado
81008

Dear Sir

Enclosed you will find a copy of Resolution No 9,
Series 1982, approved by the Town of Fairplay Board
of Trustees, at their regular Meeting held on
December 6, 1982

This Resolution in regard to changing the management
prescription for the Beaver Creek drainage from water
production to water quality improvement.] 1

Sincerely,

Town of Fairplay

Helen Strayer

Helen Strayer, Town Clerk

hs

enclosure (certified)

1 This prescription change has been made See Forest Plan Map,
Chapter I, CHANGES BETWEEN DRAFT AND FINAL EIS, and Appendix G,
Final Environmental Impact Statement

VI-256

TOWN OF FAIRPLAY
Certificate to be a true, correct
and correct copy of the original
in my custody

Dated 12-9-1982

Helen Strayer
Town Clerk

Enclosure to Letter F-340
TOWN OF FAIRPLAY
STATE OF COLORADO
RESOLUTION NO 9
Series 1982

FOREST SERVICE RESPONSE

Resolution urging the United States Forest Service, of the United States Department of Agriculture, to amend the proposed Pike National Forest Land and Resource Management to change the management prescription for the Beaver Creek drainage from water production to water quality improvement

2

WHEREAS, the Town of Fairplay obtains its municipal and domestic water supply from Beaver Creek, and

WHEREAS, the United States Department of Agriculture has promulgated a proposed land and resource management plan encompassing Pike National Forest, and has invited written comments on the proposed plan and,

2 See response to number 1 above

WHEREAS, the proposed land and resource management plan has designated the entire Beaver Creek drainage above the point of diversion of the Town's municipal and domestic water supply to be in a management area prescribed for water production,

NOW, THEREFORE, BE IT RESOLVED by the Board of Trustees of the Town of Fairplay, State of Colorado to encourage the United States Forest Service and the United States Department of Agriculture to amend the proposed land and resource management plan to place the Beaver Creek drainage in the management area prescribing management practices for water quality improvement, primarily to include the general direction that conflicts between water quality and other resources be resolved in favor of water quality. The Beaver Creek drainage will be the primary

VI-257

Enclosure to Letter F-340

FOREST SERVICE RESPONSE

source of the Town's domestic and municipal water supply for the foreseeable future, and the Board of Trustees is gravely concerned about the possible deliterious effect on the water supply if the potential for extensive grazing, mining and other public and private uses of the Beaver Creek drainage should be exploited in the future. The Board of Trustees is further concerned that present activities in the Beaver Creek drainage are harmful to the Town's water supply, but within presently acceptable limits. The Town believes that any future activities in the water shed that increase the harm to the Town's water supply should include mitigating measures not only to maintain the present water quality but to ameliorate the existing harm, particularly where such ameliorative measures can be taken without substantial increase in cost to the forest user or where the increased time is due to an expansion of the activities of present users. The Board of Trustees also believes that a change of the Beaver Creek drainage to a water quality improvement management area will eliminate virtually any chance of conflict, and will promote harmony and cooperation, as the forest service and the Town respectively attempts to enforce their regulations and water shed protection ordinance.

No response necessary

For all of the foregoing reasons, the Board of Trustees of the Town of Fairplay strongly urges the United States Department of Agriculture, and especially the United States Forest Service, to designate the Beaver Creek drainage in management area 9D of the Land and Management Resource Plan for the Pike National Forest.

SO RESOLVED this 6th day of December, 1982.

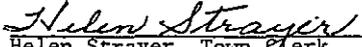
Enclosure to Letter F-340

FOREST SERVICE RESPONSE



A. Douglas Hart, Mayor

ATTEST



Helen Strayer, Town Clerk

No response necessary

VI-259

STATE OF COLORADO

Division of Parks & Outdoor Recreation

1313 Sherman Street Rm 618
Denver Colorado 80203
Phone (303) 839-3437

RECEIVED
DEC 8 1982



FOREST SERVICE RESPONSE

P&PI

Richard D Lamm
Governor
D Monte Pascoe
Executive Director
George T O Malley Jr
Director
Colorado Board of Parks
and Outdoor Recreation
Richard G Beidleman
Chairman
Phil Eggleston
Vice Chairman
Hubert A Farbes Jr
Secretary
Teresa J Taylor
Member
Richard S Barlett
Member

November 29, 1982

RECEIVED
K-2
REGIONAL FORESTER

DEC 1 1982

Craig Rupp, Regional Forester
Rocky Mountain Region
USDA Forest Service
11177 West 8th Avenue
Lakewood, Colorado 80225

Dear Mr Rupp

After examining the recreation needs of the State Planning regions (4, 6, and 7) which are affected by the Pike San Isabel National Forest, the EIS and Forest Plan appear to be in general accord with the Colorado Statewide Comprehensive Outdoor Recreation Plan. Congratulations on completion of this document.

OWR
STH

VI-260

We do, however, feel that the statements made with regard to recreation in the section describing general forest direction seem quite brief considering this is one of the "amenity values being emphasized" in the Plan

1

Further elaboration of the USFS direction with regard to road and trail access is warranted. Given the reduction in acres available for motorized and non-motorized use as shown on page 29 of the EIS between the proposed and the no action alternatives and an increase in dispersed recreation use as shown on page 45 of the Forest Plan, a general management direction of reduced recreation acreage that is more intensively used by the public appears to be emerging.

2

Sincerely,

George T. O'Malley, Jr
Director

GTO.JC:nb
cc. Dewitt John

1. The sections "Forest Direction" and "Management Area Prescriptions" Forest Plan, Chapter III, have been revised and expanded to include additional management requirements relative to both dispersed and developed recreation
2. Management Requirements (A-14 and 15, Dispersed Recreation Management, L-01 and 20, Transportation System Management, L-23, Trail System Management, and L-22, Trail Construction and Reconstruction) in Chapter III, Forest Plan have been revised and expanded to more accurately portray management emphasis in the prescriptions

All prescriptions provide opportunity for recreation use to varying degrees, except where restricted for specific purposes such as in research areas. Management Areas with prescriptions specifically identified with a recreation emphasis such as Management Area Prescriptions 2A, 2B, or 3A designate management areas where opportunity for recreational activities is emphasized over other resource uses. Recreational pursuits are not precluded in other Management Areas. We agree, that increased recreational use of National Forest System lands is emerging.



LETTER W-44

United States Department of the Interior

GEOLOGICAL SURVEY
BOX 25046 M.S. 922
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

FOREST SERVICE RESPONSE

IN REPLY REFER TO:

October 18, 1982

Bruce Morgan
Forest Supervisor
San Isabel National Forest
910 Highway 50 West
Pueblo, Colorado 81008

Dear Sir:

The U.S. Geological Survey completed a geochemical survey of the Greenhorn Mountain Wilderness Study Area in the summer of 1982 in accordance with the stipulations laid out in the Wilderness Act of 1964. The results of this study will be published in detail early in 1983 and made available to the public. However, I would like to pass along our preliminary findings to you now for public record and so that they may be considered in determining the future of the Greenhorn Mountain Wilderness Study Area.

1

1 The Forest has the U S Geological Survey report for the Greenhorn Mountain Wilderness Study Area This additional information is appreciated and has been used to update the minerals data for the Forest Plan and the Legislative Environmental Impact Statement for the Wilderness Study Area

Our study included geologic mapping, a gamma-ray scintillometer survey, and sampling of both stream sediments and rocks for geochemical analyses, over a two month period in the summer of 1982. Our geologic mapping failed to identify any geologic systems favorable for mineralization and our gamma-ray scintillometer survey did not locate any anomalously radioactive samples in the Wilderness Study Area (WSA). Several of the stream sediments and rock samples showed anomalous values in isolated elements but were very localized in their area. The results of our work therefore indicate that there is low potential for mineral resources within the WSA. There is significant mineralization, however, just south of the WSA near Badito Cone, and the area has been previously claimed. We found anomalous As, U, Th, Mo, and Zr associated with a fault in the Dakota Sandstone, with a source of mineralization presumably the granitic rock that makes up Badito Cone. We mapped, in detail, other areas in the WSA wherever similar granitic rock was present and located no associated mineralization. There is also low to moderate potential for oil and gas reserves in the sediments to the southeast of the WSA, but they all occur outside of the WSA.

2

2 This information has been included in the Greenhorn Mountain Wilderness Study Area report It was considered in arriving at the recommendation of suitable for inclusion of the Greenhorn Mountain Wilderness Study Area in the National Wilderness Preservation System

In summary, there is low potential for mineral resources within the Greenhorn Mountain Wilderness Study Area. I will send you a copy of our mineral resource potential report when it is published, which will further document our findings.

Sincerely, *Margo I Toth*

copies to: Gus Goudarzi
Chuck Thorman
John Dersch
Dave Lindsey
Dave Baskin

Margo I. Toth
Project Chief
Greenhorn Mountain Wilderness
Project
(303) 234-6359

VI-261



pitkin county

508 east main street
aspen, colorado 81611

FOREST SERVICE RESPONSE

November 19, 1982

Bruce H. Morgan, Supervisor
Pike-San Isabel National Forest
1920 Valley Drive
Pueblo, Colorado 81008

Dear Mr. Morgan:

I want to express my disappointment with the Forest Service recommendations for Wilderness in the Pike-San Isabel National Forests. Please know that I strongly support Wilderness status for Buffalo Peaks, Greenhorn Mountain, Sangre de Cristo, Spanish Peak, and Lost Creek.

] 1

While the Greenhorn Mountain proposal is a good one, the character of the lands in the other areas has not changed since Dr. Cutler encouraged the USFS to propose reasonable acreages in 1979.

Please enter this letter into the official record.

1 The Colorado Wilderness Act requires that the qualifying lands within the referenced area be reviewed as to their suitability or unsuitability for inclusion in the National Wilderness Preservation System. The Forest Plan recommends that 187,169 acres of the Sangre de Cristo Wilderness Study Area (61,657 acres on the San Isabel National Forest), 36,060 acres of the Buffalo Peaks Wilderness Study Area and 22,300 acres of the Greenhorn Mountain Wilderness Study Area be designated wilderness. Management of all Wilderness Study Areas will be to preserve the wilderness characteristics until Congress has made a final decision.

VI-262

Thank you,

Robert W. Child
Pitkin County Board of County Commissioners

cc: Rep. Raymond P. Kogovsek

LIST OF AGENCIES, ORGANIZATIONS AND PERSONS TO WHOM COPIES OF
THE STATEMENT ARE SENT

Consultation with Others

Early public involvement concentrated on the identification of issues and concerns. Open house sessions were held in eleven locations throughout the planning area including major cities along the Front Range. A total of 169 written responses were received from 46 communities in a four state area. Public comments were also received from individuals, organizations and agencies during development of the land management plan for the Upper Arkansas Unit during the 1970's. The issues and concerns identified were compiled in a booklet and distributed to those people that had responded to past planning efforts. In addition, 500 letters announcing the availability of the booklet were sent out.

After replies from the booklet were received, a scoping process was initiated to identify the major issues and concerns. These were identified and addressed in Planning Action 1, which is a part of the planning record and is available for review at the Forest Supervisor's Office, Pueblo, Colorado.

Ten Citizen Involvement Groups were established to provide continuing public input on various phases of the land management planning process. Groups were composed of a cross-section of interested individuals and consisted of 8 to 12 members. District Rangers and a member of the Interdisciplinary Planning Team attended the meetings and documented the groups' responses and views on the land management planning process and key planning actions. Citizen involvement groups were located in Buena Vista, Colorado Springs, Denver, Fairplay, La Junta, La Veta, Pueblo, Springfield, and Westcliffe, Colorado and Elkhart, Kansas.

Periodic news releases were mailed to every individual, group, organization and government agency/official on the mailing list to keep them informed of the progress of the land management plan.

Copies of the Draft Environmental Impact Statement and Proposed Forest Plan were distributed to organizations, agencies, and individuals specifically requesting copies. Those individuals requesting information on the Proposed Forest Plan were mailed the summary only. Approximately 830 copies of the summary were mailed out.

Copies of the DEIS, Proposed Forest Plan and Planning Action documents were available on a loan/check out basis from each Ranger District Office and the Forest Supervisor's Office.

Mailing List

Copies of the Final EIS and Forest Plan will be mailed to organizations, agencies and individuals who requested copies. Others will receive copies of an expanded summary.

Copies of the Final EIS and Forest Plan are available for review at each Ranger District and the Forest Supervisor's Office. Addresses are listed below:

Supervisor's Office
1920 Valley Drive
Pueblo, CO 81008

Leadville Ranger District
130 West Fifth Street
P.O. Box 970
Leadville, CO 80461

Salida Ranger District
230 West 16th
P.O. Box 219
Salida, CO 81201

San Carlos Ranger District
248 Dozier Street
Canon City, CO 81212

Pikes Peak Ranger District
320 W. Fillmore Street
Colorado Springs, CO 80907

South Park Ranger District
NW of Junction of Hwys 9 & 285
P. O. Box 218
Fairplay, CO 80440

South Platte Ranger District
393 South Harlan, Suite 107
Lakewood, CO 80226

Comanche National Grassland
Carrizo Unit
212 East 10th Street
P. O. Box 127
Springfield, CO 81073

Comanche National Grassland
Timpas Unit
East Highway 50
P. O. Box 817
La Junta, CO 81050

Cimarron National Grassland
737 Villymaca Street
Elkhart, KS 67950

Government Agencies

Federal

National Park Service - Rocky Mountain Regional Office
District Conservationist, Soil Conservation Service
USDA - Science and Education Administration
Bureau of Reclamation
U.S. Fish and Wildlife Service
Soil Conservation Service
Agriculture Stabilization and Conservation Service
Rocky Mountain Forest and Range Experiment Station
U.S. Geological Survey

Federal (Continued)

Bureau of Land Management
Bureau of Mines
Environ Prog. Office of Management and Organization,
Department of Treasury
Federal Highway Administration, Regional Administration
Water Resources Council
USDI - Environment Project Review
Office of the Environment - NEPA Affairs - U.S. Department of Treasury
Federal Energy Regulatory Commission - Environment Quality
Regional Administration EPA
USDA - General Counsel Office, Regional Attorney
USDC - Assistant Secretary for Environmental Affairs
USDA - Secretary Environmental Quality Activities
USDA - Agriculture Stabilization and Conservation Service
Advisory Council on Historic Preservation
USDA - Office of EEO
USDA - Rural Electrification Administration
USDA - Soil Conservation Service
USDA - Administrative Agriculture Research Service
Secretary of Defense, Deputy Assistant - Environmental and
Safety (M,RA&L)
USDI - Office of the Secretary
U.S. Department of Transportation
Division of Water Resources
USDA Office of the Secretary
Farmer's Home Administration
Federal Highway Administration - Region Eight
San Juan National Forest
White River National Forest
Nebraska National Forest
Black Hills National Forest
Bighorn National Forest
Medicine Bow National Forest
Shoshone National Forest
Arapaho and Roosevelt National Forests
Grand Mesa, Uncompahgre, and Gunnison National Forests
Rio Grande National Forest
Routt National Forest
Pacific Southwest Interagency Committee
Huron-Manistee National Forest
EIS Review Coordinator, EPA, Region VIII
Office of Economic Opportunity
Research Institute of Environmental Medicine
Advisory Council on Historical Preservation
USDI Bureau of Land Management
Soil Conservation Service
USGS - Conservation Division
Carson National Forest
U.S. Air Force Academy
Office of Environment and Engineering

Federal (Continued)

USDI Office of Surface Mining
BLM Area Office
U.S. Army Corps of Engineers, District Engineer - Omaha, NE
U.S. Army Corps of Engineers, District Engineer - Albuquerque, NM

State

David Miller - State Capitol
Colorado Land Use Commission
Assistant to Governor for Natural Resources
Colorado State Clearinghouse - Division of Planning
Colorado State University
Department of Housing and Urban Development
Colorado Department of Health
Colorado Division of Parks and Outdoor Recreation
State Department of Highways
Colorado Geological Survey
State of Colorado Front Range Project
Colorado Division of Wildlife
Colorado Department of Highways
Colorado Historical Society
Greater Southwest Regional Planning Commission
Colorado Farm Bureau
Colorado Department Local Affairs
Southeast Colorado Water Conservation District
Division of Architectural Services
Parks and Resources Authority
State Historic Preservation Officer
Department of Forestry - Kansas State University
Colorado Department of Natural Resources - State Soil Conservation Board
Colorado Department of Natural Resources
Kansas Fish and Game Commission
Kansas State Conservation Commission
Kansas State Clearinghouse - Division of Planning

Local

Teller County Water and Sanitation District #1
Town of Monument
Coal Creek Town
Lake County Planning and Zoning
Fremont County Planning and Zoning
Chaffee County Planning and Zoning
Saguache County Planning and Zoning
Park County Planning and Zoning
Upper Arkansas Area Council of Governments
Lower Arkansas Valley Council of Governments
Pueblo Area Council of Governments
Huerfano-Las Animas Area Council of Governments
San Luis Valley Council of Governments

Local (Continued)

Pikes Peak Area Council of Governments
Denver Region Council of Governments
Pueblo County Courthouse

16

Government Officials

Federal

Honorable William Armstrong, USS
Honorable Ray Kogovsek, Representative
Honorable Ken Kramer, Representative
Honorable Nancy Kassenbaum, USS, Kansas
Honorable Robert Dole, USS, Kansas
Honorable Hank Brown, Representative
Honorable Tim Wirth, Representative
Honorable Patricia Schroder, Representative
Honorable Gary Hart, USS
Honorable Charles P. Roberts, Representative, Kansas
Honorable Don Schaefer, Representative

11

State

Honorable Richard Lamm, Governor
Honorable Larry E. Trujillo, Sr., Representative
Honorable Leo Lucero, Representative
Honorable Stanley E. Johnson, Representative
Honorable Barbara S. Holme, Senator
Honorable Leroy Hayden, Senator, Kansas
Honorable Keith Farrar, Representative, Kansas
Honorable Jack Fanlon, Representative
Honorable Robert N. Shoemaker, Representative
Honorable Lewis Entz, Representative
Honorable Bob L. Kirscht, Representative
Honorable Harvey W. Phelps, Senator
Honorable John Beno, Senator
Honorable Harold L. McCormick, Senator
Honorable Regis F. Groff, Senator
Honorable Richard M. Soash, Senator

15

Local

Clear Creek County Commissioners
Saguache County Commissioners
Morton County Commissioners, Kansas
Stevens County Commissioners, Kansas
Baca County Commissioners
El Paso County Commissioners

Local (Continued)

Douglas County Commissioners
Teller County Commissioners
Chaffee County Commissioners
Lake County Commissioners
Park County Commissioners
Otero County Commissioners
Dave Randle - Pitkin County Courthouse
Fremont County Commissioners
Huerfano County Commissioners
Las Animas County Commissioners
Pueblo County Commissioners
Alamosa County Commissioners
Jefferson County Commissioners

Libraries

Morton County Library, Elkhart, KS
Baca County Library, Springfield, CO
Lamar City Library, Lamar, CO
Lamar Community College, Lamar, CO
Lower Arkansas Valley, Regional Library, Las Animas, CO
Manzanola Public Library, Manzanola, CO
Rocky Ford City Library, Rocky Ford, CO
Swink City Library, Swink, CO
Woodruff Memorial Library, La Junta, CO
Otero Junior College, La Junta, CO
Park County RE-2 School District Library, Fairplay, CO
Lake George Elementary School Library, Lake George, CO
Lake County Public Library, Leadville, CO
Colorado Mountain College Library, Leadville, CO
Colorado College Library, Colorado Springs, CO
Pikes Peak Community College Library, Colorado Springs, CO
University of Colorado, Colorado Springs, CO
Penrose Public Library, Colorado Springs, CO
Manitou Springs Public Library, Manitou Springs, CO
Rampart Regional Library District, Woodland Park, CO
Victor Public Library, Victor, CO
Franklin Ferguson Memorial Library, Cripple Creek, CO
Monument Hill Branch Library, Monument, CO
University of Denver Library, Denver, CO
Metropolitan State College Library, Denver, CO
Community College of Denver, Aurora, CO
Auraria Campus, Denver, CO
Red Rocks Campus Library, Golden, CO
Regis College Library, Denver, CO
Villa Regional Library, Lakewood, CO
Lakewood Regional Library, Lakewood, CO
Evergreen Regional Library, Evergreen, CO
Columbine Branch, Littleton, CO
Park County Public Library, Bailey, CO

Libraries (Continued)

Douglas County Public Library, Castle Rock, CO
Louviers Branch Library, Louviers, CO
Parker Branch Library, Parker, CO
Canon City Public Library, Canon City, CO
Florence Public Library, Florence, CO
Morgan Library, Colorado State University, Ft. Collins, CO

40

Received Copies of summary only:

News Media

Newspapers

Herald Democrat - Leadville
Fairplay Flume
Wet Mountain Tribune - Westcliffe
The Sun - Canon City
Arkansas Valley Journal - La Junta
Huerfano World - Walsenburg
Canon City Daily Record
Florence Citizen
Mountain Mail - Salida
Gazette-Telegraph - Colorado Springs
La Junta Tribune Democrat
Lamar Daily News
Daily Gazette - Rocky Ford
Rocky Mountain News - Denver
Star Journal-Chieftain - Pueblo
Chaffee County Times - Buena Vista
Kiowa County Press - Eads
Denver Post
Plainsman Herald - Springfield
Ute Pass Courier - Woodland Park
News Press - Douglas County
Colorado Springs Sun
La Voz De Colorado - Denver
Bent County Democrat - Las Animas
Fishing and Hunting News - Seattle, WA
La Cucaracha News - Pueblo
Robert Overton - Pueblo
High Timber Times - Conifer
Tribune - Monument
Lakewood Sentinel
Littleton Independent
Mountain Commuter - Pine
Teller County Sentinel - Woodland Park
Chaffee County Republican - Buena Vista
Ordway News ERA
Chronicle News - Trinidad
Cripple Creek Goldrush - Cripple Creek
Greenhorn Valley News - Rye
Tri-State News - Elkhart, KS

2, 3

Radio

KAPI - Pueblo
KDZA - Pueblo
KPUB - Pueblo
KPLV - Pueblo
KYNR - Pueblo
KFEL - Pueblo
KCCY - Pueblo
KIDN - Pueblo
KKFM - Colorado Springs
KRDO - Colorado Springs
KSSS - Colorado Springs
KEPC - Colorado Springs
KVOR - Colorado Springs
KWYD - Colorado Springs
KILO - Colorado Springs
KERE - Littleton
KHOW - Denver
KOA - Denver
KLZ - Denver
KIMN - Lakewood
KLMR - Lamar
LFLJ - Walsenburg
KVRH-AM - Salida
KBRR - Leadville
KCRT - Trinidad
KRLN - Canon City
KAVI - Rocky Ford
KBZZ - La Junta

28

Television Stations

KOA-TV - Denver
KRMA-TV - Denver
KWGN-TV - Denver
KBTV-TV - Denver
KMGH-TV - Denver
KBDI-TV - Boulder
KOOA-TV - Pueblo
KOOA-TV - Colorado Springs
KRDO-TV - Colorado Springs
KKTU-TV - Colorado Springs
Trinidad Community TV Company
Elkhart TV Cable - Elkhart, KS

18

Individuals and Organizations

Adson, J. M.
Atwell, T. W.
Barnes, T.
Basham, G. F.
Batting, B
Beidleman, R.
Bellomy, B.
Bennion, B. W.
Berthod's Inc. —
Blake, W. R. Jr.
Blakeslee, C. A.
Board of Water Works —
Bowen, R. L.
Branstine, F. and D.
Brice, C.
Brokaw, B.
Brown, M.
Bruce, L.
Bryer, L.
Burgess, L.
Butler, W
Carey, H.
Carter, D. A.
Cassidy, M. B.
CA4WDC, Inc.
CF&I Steel (Water Department) —
Charron, S.
Chase, B.
Chick, C.
Chick, I. B.
Chick, L.
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