DECISION NOTICE
AND
FINDING OF NO SIGNIFICANT IMPACT (FONSI)

For

North Trout Creek Forest Health and Hazardous Fuel Reduction Project

USDA Forest Service
Rocky Mountain Region
Pike and San Isabel National Forest and
Comanche and Cimarron National Grasslands
Salida Ranger District
Chaffee County, Colorado

INTRODUCTION

The United States Department of Agriculture, Forest Service (USFS) prepared an Environmental Assessment (EA) for the North Trout Creek Forest Health and Hazardous Fuel Reduction Project that was released for public review in February 2007. The EA describes two action alternatives and the potential environmental effects of the action alternatives and a no action alternative for vegetative management and associated activities in the North Trout Creek project area.

I have reviewed the EA and related material, including the project file, and base my decision on that review. This document reports my decision and the reasons I have made this decision, lists the alternatives considered, describes the public involvement process, contains the Finding of No Significant Impact, makes findings required by other laws and regulations, describes administrative review or appeal opportunities, sets an implementation date, and provides contact information for further information about this document and project.

DECISION

I have decided to select Alternative 2: Proposed Action, with modifications, for implementation. This decision modifies the selected alternative from that described in the EA. Project design criteria have been clarified in response to comments received during the public comment period for the EA. I made this decision following review of the EA, supporting materials referenced by the EA, additional information contained in the project file, and responses to public comments in **Appendix D**. These modifications do not significantly change the findings or effects of the selected alternative disclosed in the EA.

Description of the Selected Alternative

Alternative 2: Proposed Action

This alternative would use mechanical thinning, salvage timber harvesting, and prescribed fire to improve fire regime condition class and reduce hazardous fuels within the project area. Treatment activities would include: 1) salvage timber harvesting in ponderosa pine and mixed conifer stands infested with insect and disease, 2) thinning treatments in ponderosa pine and mixed conifer stands to reduce stand density and create openings (patch cuts) in mixed conifer and piñon-juniper stands to promote natural regeneration and improve wildlife habitat, and 3) prescribed burning to reduce residual slash, improve stands in condition class 2 and 3, maintain stands currently in condition class 1, and create open areas in piñon pine, juniper and shrublands to improve wildlife habitat. See Map 2.2 (Revised) for the location of treatments for Alternative 2.

Alternative 2 would follow current management direction established under the Fourmile Travel Management Plan and current range allotment management plans.

Approximately 6.0 miles of new temporary road would be created (Map 2.3 - Revised); approximately 11 miles of existing closed roads (Map 2.3 - Revised) would be reopened for temporary use; and approximately 1.0 mile of temporary stump roads would be used under this alternative. No new system roads would be created. The temporary and existing closed roads would be closed following implementation. See the Road Plan, Appendix A for road closure methods for temporary and existing closed roads.

Treatment Types

Prescription A: Prescribed Fire (approximately 5,060 acres)

The objective of prescribed fire is to reduce hazardous fuel accumulation, promote regeneration (grasses, forbs, shrubs, and trees) and reintroduce fire into fire-dependent ecosystems.

The prescribed fire units would be delineated using natural fuel breaks, roads, handline, and wetline; mechanical thinning may be completed prior to ignition to improve holding features. No product removal would occur. Aerial ignition (ping-pong ball, helitorch), hand ignition (drip torches, fusees) and/or all terrain vehicle (ATV) ignition may be used. Fire managers would work with resource specialist to determine if handlines need to be rehabilitated.

A prescribed fire plan and appropriate smoke permits would be completed and approved prior to burning. The prescribed fire plan would address such items as unit delineation, weather parameters, necessary holding resources, sensitive areas (i.e. power lines, highways, and improvements), public safety, and smoke concerns. Prescribed burning of individual units would likely be completed in 2 to 3 days, with residual smoke lasting 3 to 5 days.

Pile burning would take place in areas where broadcast burning is not desired or where fuels must be reduced prior to broadcast burning. The average size of hand piles is 6 feet long x 6 feet wide x 6 feet high. The average size of mechanical piles is 6 long feet x 6 feet x 10 feet high. The burning of the piles usually takes place in the winter months.

Ponderosa pine & Douglas-fir: In stands not designated for salvage and thinning, prescribed fire would be used to maintain stands of ponderosa pine and Douglas-fir in their current condition, reduce hazardous fuel accumulations, and return fire to the ecosystem. The desired result would be a mosaic of approximately 50 to 80% of the understory (duff, needles, grass, and small trees) vegetation burned.

Light mechanical preparation work may be needed to ensure the prescribed fire is maintained within the prescription set forth in the prescribed fire plan. Examples of preparation work include: 1) limbing trees to a height of approximately 6 to 10 feet (primarily along firelines and at critical holding points), 2) construction of handline and/or ATV dragline, to mineral soil, as a boundary between burn units, 3) bucking and removing large concentrations of dead and down material from beneath larger live trees and snags (dead and down material would be moved to open areas within the unit), and 4) falling snags near holding lines to ensure control of the prescribed burn. Where available, natural and existing fuel breaks would be used.

Piñon-juniper: Prescribed fire would be used to create openings within the piñon pine and juniper stands to improve habitat for wildlife, such as bighorn sheep. The desired result would be a mosaic pattern in the piñon-juniper stands of less than 25% of the overall piñon-juniper area burned (overstory).

Mechanical thinning may be needed to allow the prescribed fire to carry in a controlled fashion. Examples of thinning include: 1) limbing trees and 2) falling and limbing trees. Additional light mechanical preparation work may be needed to ensure the prescribed fire is maintained within the prescription set forth in the prescribed fire plan. Examples of preparation work include: 1) construction of hand line as a boundary between burn units, 2) bucking and removing large concentrations of dead and down material from beneath larger trees (dead and down material would be moved to open areas within the unit), and 3) falling snags near unit boundaries to maintain control of the prescribed burn. Where available, natural and existing fuel breaks would be used.

Meadows & shrublands: Prescribed fire would be used to improve the health of the rangeland and improve the forage. The desired result would be a mosaic pattern in the meadows and shrubland of approximately 50 to 75% of the vegetation burned.

Preparation work may be needed to ensure the prescribed burn is maintained within the prescription set forth in the prescribed fire plan. Examples of preparation work include the construction of handlines, to mineral soil, and the removal of brush. Where available, natural and existing fuel breaks would be used.

Prescription B: Salvage, Thinning, & Prescribed Fire (approximately 2,775 acres)

Ponderosa pine: Dead stands of ponderosa pine and ponderosa pine trees infected with insect and disease that are in excess of the required snag and CWD numbers needed within treatment areas (see Design Criteria #25) may be harvested and removed from the area. In areas of heavy MPB activity, infested trees would be removed and remaining trees may be thinned, if needed, to maintain the residual mature stand. Methods of removal include but are not limited to chainsaws, harvesters, skidders, dozers and log trucks.

Stands of healthy ponderosa pine (stands that have minimal or no insect or disease infestation) may be thinned to reduce overall stand density and improve the health and vigor of the remaining ponderosa pine. Feed trees, nest trees and clumps around trees used by Abert's squirrels would be retained. A 60-acre control plot has been established within the project area; mechanical treatment (i.e., harvest of trees) would be excluded from this plot (Design Criteria # 24), however prescribed fire may be allowed.

After harvesting is complete, the slash and hazardous fuels in the area may be reduced through fuelwood gathering and/or prescribed fire. Prescribed fire includes pile burning, broadcast burning or a combination of both. See the section on prescribed fire for more details.

The desired result would be less than 40% canopy closure The BA would be an average of 50 square feet over the treatment area, incorporating areas with heavier thinning (more open) and areas that are greater than 180 square feet BA with interlocking canopy (see Design Criteria #23). Existing regeneration needed for desired stocking levels would be protected where practical.

Mixed conifer (ponderosa pine & Douglas-fir mix): Dead stands of ponderosa pine and Douglas-fir that are in excess of the required snag and CWD numbers needed within treatment areas (see Design Criteria #25) may be harvested and removed from the area. In areas of heavy MPB activity, infested trees would be removed and remaining trees may be thinned, if needed, to try and maintain the residual mature stand. Remaining stands may be thinned to reduce stand density. Methods of removal include but are not limited to chainsaws, harvesters, skidders, dozers and log trucks.

After harvesting is complete, the slash and hazardous fuels in the area may be reduced through fuelwood removal and/or prescribed fire. Prescribed fire includes pile burning, broadcast burning or a combination of both. See the section on prescribed fire for more details.

The desired result would be less than 40% canopy closure. The BA would be an average of 60 square feet over the treatment area, incorporating areas with heavier thinning (more open) and areas that are greater than 180 square feet BA with interlocking canopy (see Design Criteria #23). In areas with residual aspen stands the objective of the treatment would be to stimulate the regeneration of aspen. Large diameter trees, minor species and five-needled pines would be favored for retention.

Existing regeneration needed for desired stocking levels would be protected where practical.

Lodgepole pine: Lodgepole pine that are in excess of the required snag and CWD numbers needed within treatment areas (see Design Criteria #25) may be harvested and removed from the area. Lodgepole pine stands would be harvested to: 1) create small openings of less than ten acres (patch cuts) and 2) thin the trees in between the openings. .Openings would be created to promote natural regeneration in the area and increase structural diversity. Methods of removal include but are not limited to chainsaws, harvester, skidders, dozers and log trucks.

After harvesting is complete, the slash and hazardous fuels in the area may be reduced through fuelwood removal and/or prescribed fire. Prescribed fire includes pile burning, broadcast burning or a combination of both. See the section on prescribed fire for more details.

The desired result would be less than 40% canopy closure and would maintain an average stand density of 80 square feet BA. Existing regeneration needed for desired stocking levels would be protected where practical.

Prescription C: Salvage & Thinning (approximately 695 acres)

Mixed conifer (ponderosa pine & Douglas-fir): This treatment would occur on north facing slopes where prescribed fire treatments (broadcast burning) are not desired. In these stands the main vegetation type is predominantly Douglas-fir with scattered ponderosa pine.

Mixed conifer stands would be harvested to remove dead and dying ponderosa pine and Douglas-fir that are in excess of the required snag and CWD numbers needed within treatment areas (see Design Criteria #25). In areas of heavy MPB activity, infested trees would be removed and remaining trees may be thinned, if needed, to try and maintain the residual mature stand. Remaining stands may be thinned to reduce stand density. Methods of removal include but are not limited to chainsaws, harvesters, skidders, dozers and log trucks.

Stands of healthy ponderosa pine (stands that have minimal or no insect or disease infestation) may be thinned to reduce overall stand density and improve the health and vigor of the remaining ponderosa pine. Feed trees, nest trees and clumps around trees used by Abert's squirrels would be retained. A 60-acre control plot has been established within the project area; mechanical treatment (i.e., harvest of trees) would be excluded from this plot (Design Criteria #24), however prescribed fire may be allowed.

In dominant mixed conifer stands that have a residual aspen understory the objective of the treatment would be to stimulate the regeneration of aspen. Large diameter aspen, both live and dead, would be retained to maintain wildlife habitat and diversity in the stands. Methods of removal include, but are not limited to chainsaws, harvesters, skidders, dozers and log trucks.

Fuelwood sales may be used to reduce fuel loadings. In areas with heavy, residual hazardous fuels, pile burning may used. Slash from timber sales may also be chipped or lopped and scattered. See the section on prescribed fire for more details on pile burning.

The desired result will be less than 40% canopy closure. The BA will average 60 square feet over the treatment area, incorporating areas with heavier thinning (more open) and areas that are greater than 180 square feet BA with interlocking canopy (see Design Criteria #23).

Piñon-juniper: This treatment would occur in piñon-juniper stands to create opening for wildlife. The openings within the stand would be at least 10 to 20 acres in size (patch cuts). Cut material would be lop and scatter throughout the unit.

Prescription D: No Treatment (approximately 5,457 acres)

These are acres that have been reviewed and no treatment is desired at this time due to slope, access, and current vegetation conditions.

APPENDIX B – REVISED

Listed below are the changes in prescriptions, for a limited number of polygons located in the northern portion of the project area, based on response to comments in Appendix D; polygons not listed below are correct as written in the EA.

TREATMENT BY POLYGON FOR THE PROPOSED ACTION
(April 2007 MODIFIED Version)

Polygon No.	Approximate Acres		Prescription\ Treatment Option
49a	1		D-No Treatment
49b	26		B-Salvage, Thinning & Prescribed Fire
112	16		D-No Treatment
152	31		D-No Treatment
155a	14		D-No Treatment
155b	0		B-Salvage, Thinning & Prescribed Fire
160a	2		D-No Treatment
160b	1		B-Salvage, Thinning & Prescribed Fire
171	19		D-No Treatment
176	8		D-No Treatment
177a	9		D-No Treatment
177b	1		B-Salvage, Thinning & Prescribed Fire
179a	14		D-No Treatment
179b	1		B-Salvage, Thinning & Prescribed Fire
182a	23		D-No Treatment
182b	11		A-Prescribed Fire
185a	4		D-No Treatment
185b	1		C-Salvage & Thinning

Polygon No.	Approximate Acres		Prescription\ Treatment Option
186	4		D-No Treatment
190a	32		D-No Treatment
190b	10		B-Salvage, Thinning & Prescribed Fire
192a	7		D-No Treatment
192b	12		B-Salvage, Thinning & Prescribed Fire
197a	6		D-No Treatment
197b	8		B-Salvage, Thinning & Prescribed Fire
198a	5		D-No Treatment
198b	0		A-Prescribed Fire
202	9		D-No Treatment
203a	1		D-No Treatment
203b	5		B-Salvage, Thinning & Prescribed Fire
208	2		D-No Treatment
209a	1		D-No Treatment
209b	12		B-Salvage, Thinning & Prescribed Fire
210a	0		D-No Treatment
210b	5		B-Salvage, Thinning & Prescribed Fire
213a	3		D-No Treatment
213b	12		A-Prescribed Fire
218a	3		D-No Treatment
218b	5		A-Prescribed Fire
224a	3		D-No Treatment
224b	13		A-Prescribed Fire
227	8		D-No Treatment
1334	5		D-No Treatment
1335	41		D-No Treatment

Design Criteria

This section repeats all of the design criteria from the EA and contains the modifications in the response to comments in Appendix D. These measures replace those in the EA for the purposes of project design and implementation.

Design Criteria:

1. Protect current improvements including the Midland Trail, Homestake water transmission line, bulletin boards, signs, fences, and spring developments. Range improvements would be protected and replaced, if damaged by treatment.
2. If chipping is used as a means of disposal, chips would be distributed so that the chip layer is a maximum of 2 inches in depth; otherwise the chips would be hauled off site.
3. Wood chips may be used on identified cultural sites to retard erosion and increase effective moisture, encouraging the growth of grasses and small forbs that act as stabilizing agents. The depth of the chips would be determined by the

Zone Archeologist. The Zone Archeologist would supervise and monitor these activities.

4. A cultural resource survey would be completed prior to all ground disturbing activities.
5. All eligible archeological sites, including a minimum of 30 to 50 foot buffer (depending on slope and fuel loading), would be avoided and protected from damage by equipment traveling in the area and pile burning activities. The Zone Archeologist would determine the buffer and mark the area.
6. The Zone Archeologist would identify areas where prescribed fire is not allowed, to avoid impacts to eligible sites. In areas with eligible sites, the Zone Archeologist would assist in identifying staging areas to avoid impacts to sites.
7. If heavy fuel loads exist on any of the archeological sites for which avoidance is stipulated, then those fuels may be removed with an Archeologist present.
8. If artifacts, features, or other indications of previously unrecorded heritage resources are identified in the course of ground-disturbing activities, all work in the vicinity of those materials would cease and the Zone Archaeologist would be notified immediately.
9. Timing of prescribed fire treatments would be coordinated with the Rangeland Management Specialist pre and post burning to avoid conflicts with permittees and stress on vegetation.
10. Seasonal logging restrictions would be implemented for the entire project area from December 1 through April 15 for elk winter range protection. Low frequency activities, such as prescribed burning and removing decks from open roadways (Shields and McGee Gulch) may be approved by the Wildlife Biologist on an as needed basis prior to implementation.
11. Nesting birds and raptor sightings would be reported to the Wildlife Biologist and appropriate protection measures would be implemented.
12. If new site information regarding threatened, endangered, and sensitive species is located during the course of ground disturbing activities all work in the vicinity of those species would cease and the appropriate specialist would be notified.
13. An activity exclusion area would be marked by the Wildlife Biologist and avoided around known active raptor nests from March 1 through September 30.
14. If treatments are proposed within any raptor territory, the Wildlife Biologist would work with managers to determine treatment specifications for protection of that site.
15. A minimum 100-foot buffer on either side of perennial and intermittent streams and ephemeral areas would define the Water Influence Zone (WIZ) as specified in the WCP Handbook (FSH 2509.25, Chapter 10). The WIZ includes the geomorphic floodplain, riparian ecosystem, and inner gorge.
16. Treatments would follow the WCP Handbook (FSH 2509.25, Chapter 10).
17. Mechanical thinning treatments would not occur inside the WIZ as delineated by a Fishery Biologist or Hydrologist. If the area has not been delineated, then treatments would occur outside a 100-foot buffer from all perennial and intermittent streams and ephemeral draws. The 100-foot WIZ also applies to all lakes, ponds, kettles, and other forms of standing water. Some activities such as prescribed burning and hand treatments may be allowed in the WIZ, but only after consultation and concurrence with the Hydrologist or Fishery Biologist.
18. Prescribed burning would be allowed to migrate into the WIZ from adjacent slopes, but would not be encouraged to do so; ignition of prescribed fire would not occur in the WIZ.

19. Heavy equipment and vehicles would be kept out of the WIZ, streams, swales, and lakes, except to cross at designated points, building crossings, conduct restoration work, or if protected by at least 1 foot of packed snow or 2 inches of frozen soil. Before heavy equipment or vehicles would be allowed to cross streams, the Fishery Biologist or Hydrologist would be consulted and determine where crossings would occur or be constructed, and to specify any stipulations necessary to minimize negative impacts on aquatic resources.
20. Heavy equipment or vehicles would not be allowed in streams during fish spawning, incubation, and emergence periods. For brook trout, spawning and incubation occur in September and October.
21. Avoid soil disturbing activities during periods of wet soils. Apply travel restrictions to protect soil and water.
22. If a unit has previously been mechanically thinned or treated, no salvage treatment will take place after prescribed fire treatments occur.
23. Protect or provide for one Abert's squirrel nest tree clump (0.1 acre of 9 to 22 inch dbh ponderosa pine with a BA of 180 to 220, if available, and interlocking canopy) per six acres in ponderosa pine forests (Forest Plan, pg. III – 29). In addition ponderosa pine trees showing sign of Abert's squirrel feeding and nesting activity would be retained as wildlife trees. This direction would be written into timber prescriptions and the prescribed fire plan. For prescribed fire, protection measures include avoiding the torching of ponderosa pine clumps and Abert's squirrel feed trees.
24. Mechanical treatments would be excluded in established Abert's squirrel control plots.
25. Implementation and effectiveness monitoring would be conducted by an interdisciplinary team. Snag, down woody material, and other stand conditions would be monitored pre, during, and post treatment to ensure desired conditions are achieved. The following snags and CWD guidelines would be followed:

    Snags and Coarse Woody Debris
    In forested areas, maintain greater than or equal to 40 snags/recruitment trees per five acre average; retain the largest sizes and numbers available (all stages of development). These should consist of at least 30 snags and/or down logs per five acres and 10 recruitment snags (live trees) per five acres. Guidelines for snags include:
    - Retain all soft snags (class 3, 4, and 5) except for safety hazards (Forest Plan, pg. III – 12) to the greatest extent reasonable and practical.
    - Retain hard snags (when they are present) greater than or equal to 12 inches dbh or as large as available.
    - If above existing snag levels are not available, provide for green recruitment snag trees sufficient to bring snag/recruitment snag levels up to the above mentioned levels in a well distributed manner of both clumps and individual trees, favoring largest available trees. Trees with defects (e.g. "wolfy" appearance, dead tops, forked tops, cankers, heartrot, knarls, diseases, broken tops and large limbs) would be selected when possible as follows:
        - Provide for the above number of recruitment snags (live trees).
        - Create new snags by prescribed fire plan design or other means, as necessary to meet the minimum snag numbers specified above.

    - Protect reserved snags/down logs from fuelwood cutting, mechanical treatment and prescribed fire treatment to the greatest extent reasonable and practical.

26. FSR 309, 311 and 376 would be closed by existing gates from December 1 through April 15, as stated in the Fourmile Travel Management Plan. These roads would be available for administrative access where it does not conflict with Design Criteria #10.
27. Gates and/or barricades would be installed on temporary roads and existing closed roads to restrict use by the public during operations and until final road closures occur.
28. In forested areas, a 200-foot untreated buffer on each side of the road would be maintained along 75% or more of system roads to discourage and minimize OHV use and to maintain visual screening for wildlife. Mechanical treatment would not take place in the buffer, but prescribed fire may be allowed. Hazard trees, defined as trees that pose a safety concern along the road corridor, may be mechanically removed.
29. Access routes would be designated within public firewood areas.
30. Only administrative and permitted access would be allowed on new temporary roads and previously closed roads.
31. Temporary roads used during the project activities would be closed by ripping and seeding with a native seed source, then signed to inform the public vegetative restoration is in progress. Road closures would occur within six months after completion of the treatment(s) in that unit.
32. To reduce risk of spreading noxious weeds, heavy equipment would be cleaned and inspected prior to entering the project area. Treatment areas would be monitoring pre and post treatment for noxious weeds. Weed locations would be sent to the Noxious Weeds Coordinator and scheduled for treatment.

REASONS FOR MY DECISION

I reached this decision after careful consideration of all the alternatives analyzed and documented in the environmental assessment, and in response to issues and comments from the general public and environmental groups.

ALTERNATIVES CONSIDERED

Three alternatives were considered in detail (the no action and two action alternatives). The proposed action alternative is described in detail above. The other alternatives are the “No Action” alternative, where no new activities would take place in the project area, and the second action alternative (Alternative 3) are described below. These alternatives are discussed in Chapter 2 of the EA (pages 17 - 23).

Four other alternatives (Alternatives 4 – 7) were considered but eliminated from detailed study.

Alternative 4: Approximately 50,000 acres would be treated using commercial timber sales, public fuelwood sales, and prescribed burning to: 1) treat ponderosa pine stands

infested with insect and disease, 2) thin stands of ponderosa pine, 3) lodgepole pine and mixed conifer stands, and 4) reduce hazardous fuel accumulations. The project area included areas located on both the north and south sides of Highway 24/285. The alternative was eliminated from consideration due to the large area it covered. Resource specialists within the Forest Service determined that the necessary field work needed for the analysis was unfeasible for such a large area within a reasonable time frame.

Alternative 5: Harvesting would be limited to areas with MPB infestations. Slash and hazardous fuels would be reduced using prescribed fire. The only treatments would be salvage and prescribed fire. This alternative was eliminated because it would not improve the health of the remaining forested stands nor improve wildlife habitat in areas, such as piñon-juniper stands and grass.

Alternative 6: This alternative would only use prescribed fire to treat hazardous fuel accumulations and improve forest health conditions. Prescribed fire would help to reduce hazardous fuels in limited areas with lighter fuel loads and would re-introduce fire into portions of the watershed. Mechanical treatments would only be used to complete preparation work for prescribed burning. This alternative was eliminated because it would not reduce hazardous fuels in the majority of the project area; areas with the heaviest fuel loading would not be treated under this alternative due to the high likelihood of escape during prescribed fire operations.

Alternative 7: This alternative would only use mechanical thinning to treat hazardous fuel accumulations and improve forest health. This alternative was eliminated because mechanical thinning would reduce hazardous fuel but would not re-introduce fire into the watershed, maintaining the health and diversity of fire adapted ecosystems.

Alternative 1: No Action

The No Action alternative is used as a baseline to compare and analyze the other action alternatives. It is defined as a continuation of existing management practices. It considers what may occur if the proposed project does not occur. Current management plans would continue to guide management of the project area, including the Fourmile Travel Management Plan and current range allotment management plans.

Forest stands and habitat conditions would continue their current trends. Tree growth would continue to be suppressed in dense stands; the development of different stand structure and age classes would continue to be limited. MPB may continue to cause high mortality in the remaining ponderosa pine stands converting them to early seral stages.

In the short-term, a high number of snags would be present within the project area; long-term, the number of snags would likely decrease as the MPB activity lowers. Current snags (due to MPB mortality) would rapidly fall (3 to 5 years) due to wind and rot at the base of the trees. As snags fall, they would provide CWD that would provide high quality habitat for a variety of wildlife species, contribute to organic material, and nutrient recycling. This would also increase the hazardous fuel accumulation in the project area.

Alternative 3

This alternative is similar to Alternative 2. The primary difference between Alternative 2 and Alternative 3 is the location of specific treatment prescriptions and the number and miles of temporary roads created, and existing closed roads reopened for temporary use. The difference in the miles of roads and treatment prescription was based on the following considerations brought forth from both internal and external scoping: slope steepness, access, continuity of the vegetation, and natural fuel breaks for prescribed fire.

Alternative 3 would follow current management direction established under the Fourmile Travel Management Plan and current range allotment management plans.

Mechanical thinning, salvage timber harvesting, and prescribed fire would be used to improve fire regime condition class and reduce hazardous fuels within the project area. Types of treatments include: 1) salvage timber harvesting in ponderosa pine stands infested with insect and disease, 2) thinning treatments in mixed conifer stands to reduce stand density and create openings in mixed conifer to promote natural regeneration, and 3) prescribed burning to reduce residual slash, improve stands in condition class 2 and 3, maintain healthy stands currently in condition class 1, and create open areas in piñon-juniper stands and shrublands to improve wildlife habitat. Areas located in high elevation spruce-fir would be recommended for fire use should future management direction allow.

Approximately 6.0 miles of new temporary road would be created; approximately 10.6 miles of existing closed roads would be reopened for temporary use; and approximately 1.0 mile of temporary stump roads would be used under this alternative. No new system roads would be created. The temporary and existing closed roads would be closed following implementation. See the Road Plan, Appendix A for road closure methods for temporary and existing closed roads.

Treatment Types

The description of the treatment types are the same as described in Alternative 2. The difference between the two action alternatives is the number of acres treated and location of those treatment units. Acres per treatment type for Alternative 3 are:

Prescription A: Prescribed Fire - approximately 6,800 acres
Prescription B: Salvage, Thinning, & Prescribed Fire - approximately 2,600 acres
Prescription C: Salvage & Thinning - approximately 700 acres
Prescription D: No Treatment - approximately 4,800 acres

PUBLIC INVOLVEMENT

Starting in April 2004, the proposal was listed in the Schedule of Proposed Actions. Scoping was initiated on March 23, 2004; the proposal was provided to the public and other agencies for comment. Eleven comments were received.

In addition, as part of the public involvement process, the agency submitted a press release to local papers notifying the public of the project proposal and sponsored a field trip to the project area for interested members of the public. The field trip took place on July 1, 2004. Both private citizens and environmental groups attended the field trip.

The EA was mailed to a group of interested parties on February 13, 2007. The EA was also made available on the website for the PSICC. The public comment period of 30 days began when a Legal Notice was published on February 15, 2007 in The Mountain Mail. Comments were accepted until March 16, 2007. Two comment letters were received during the public comment period. Each substantive comment received was reviewed. The interdisciplinary team responded to all substantive comments. **Appendix D** contains all of the comments and responses.

ENVIRONMENTAL JUSTICE

Executive Order 12898 requires federal agencies to address disproportionately high and adverse human health or environmental effects on minorities and low-income populations and communities. This decision would not be expected to cause significant changes in the socioeconomic environment of the project area and thus would not affect low income or minority populations or communities.

FINDING OF NO SIGNIFICANT IMPACT

After considering the environmental effects described in the EA, I have determined that implementation of Alternative 2 (Proposed Action) with modifications will not significantly affect the quality of the biological, physical, or human environment. Therefore, an environmental impact statement (EIS) will not be prepared. This determination is based on the effects analysis documented in the EA, subsequent analysis associated with the response to comments, and the following factors (40 CFR 1508.27):

CONTEXT

This project will occur within a local context. Local issues were identified through the scoping process and were considered in alternative development and effects analysis. The project area is limited to one percent of the San Isabel National Forest (Leadville, Salida, and San Carlos Ranger Districts of the PSICC). Project duration is expected to be 5 to 7 years, but could take longer to complete, depending on funding and other factors. Although the project has regional interest, the people most affected by the project will be local residents and recreationists, primarily from the Denver and Colorado Springs metropolitan areas that frequent the project area.

INTENSITY

Based on the analyses documented in the North Trout Creek Forest Health and Hazardous Fuel Reduction EA, I have determined the following with regard to the intensity of the project:

Environmental Effects

I find that the proposed action can be carried out with no significant effects on socioeconomic, cultural, and natural resources as documented by the EA. Overall, this project will have a long-term beneficial effect on the environment, as discussed in several sections in Chapter 3 in the EA. The treated areas will be less dense, more open, and less vulnerable to diseases, insects, and large-scale, high-intensity wildfire. The treatments will create a more sustainable and heterogeneous natural landscape with diverse habitats that will have a long-term beneficial effect on wildlife. Reducing the risk of large-scale, high-intensity wildland fire will decrease the risk of erosion from burned areas and the potential for sediment delivery to streams. Decreasing the risk of forest fires will reduce the risk to health and safety conditions for local landowners and firefighters. The local economy will temporarily benefit from vegetation treatment-related employment and expenditures and the risk of negative economic effects from large-scale wildland fires will be reduced.

I find that the vegetation treatments will cause some insignificant adverse effects, most of which will be short-term. There may be a slight decrease in soil productivity because of topsoil disturbance during vegetation removal and prescribed burning operations. There may also be a slight decrease in soil quality because of erosion. The treatments will reduce the area prone to fire, thus substantially reducing the long-term soil erosion risk. Some forested habitat will be changed into openings. A more open forest structure will be created in some closed stands. This will adversely affect those wildlife species that depend on the more closed habitat structure, but benefit those species that prefer open habitats. Some adverse effects will be caused by the use of prescribed fire. Some large woody debris and soil organic matter will be consumed. The severity of these effects will depend on the intensity and duration of the prescribed fire. Recreationists and forest visitors will notice some disturbance to the landscape. This is an unavoidable effect of vegetation treatment activities. Timber harvesting and road building activities may temporarily disrupt normal recreational uses of the area. Effects will include noise, dust, wood debris, smoke, and disturbance of understory vegetation. There is no assurance that every cultural resource site has been located in advance of all planned management activities. Some ground-disturbing activity could unavoidably affect an undiscovered historic or prehistoric site. Sites discovered in this manner will be immediately protected from further disturbance with a site-specific management plan. Some sites could be inadvertently destroyed or damaged.

Public Health or Safety

The proposed action will comply with all state and federal regulations related to public health and safety. I find there are no adverse effects on public health and safety

because the actions will reduce the risk of large-scale, high-intensity fires and improve the safety of the public and firefighters.

Unique Characteristics of the Area

I find there will be no significant effects on unique characteristics such as historic or cultural resources, parklands, prime farmlands, wetlands, floodplains, or wild and scenic rivers. Parklands and prime farmlands will not be affected because they do not occur in the project area. Effects to wetlands and floodplains will be minimized through application of standards in the Watershed Conservation Practices Handbook. There are no potential or eligible wild and scenic rivers in the project area.

Controversy

There is relatively little controversy with this project. I find this project to be scientifically supported as discussed in the rationale for my decision above and in Chapter 3 of the EA. Comments received during scoping and public review of the EA indicated general support for the project, but not necessarily all components of the project. New project design standards, mitigation measures, and monitoring tasks were developed in response to public comments on the EA. These new measures will slightly modify project components to respond to concerns expressed by the public during review of the EA.

Uncertainty

The analyses in the EA show that the effects of the proposed project are not uncertain and do not involve unique or unknown risk. The proposed activities evolved from previous treatments undertaken on similar projects in similar locations and environments. Best management practices, design criteria, and monitoring and adaptive management techniques will ensure effects are within the expected parameters.

Precedent

I find that this decision does not set a precedent for future decisions. This project relies on treatment activities that have been previously used near the project area in the same type of landscape in terms of vegetation, fire regimes, land uses, and other factors. This project will not establish a precedent for future projects with significant effects. Future similar projects will have to be evaluated under NEPA to address the significance of the effects of those specific actions.

Cumulative Impact

I find that the cumulative effects of this project are not significant because this activity, when considered in combination with other past or reasonably foreseeable actions, is not expected to have a cumulatively significant effect on any resources (Chapter 3 in the EA).

Properties On or Eligible for the National Register of Historic Places; Significant Scientific, Cultural, or Historic Resources

I find that the proposed action will have no adverse effect on districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places because the sites that are eligible or potentially eligible will be avoided by all project activities. I find that the proposed action will not cause loss or destruction of significant scientific, cultural, or historical resources because project activities will avoid these resources. Local tribal officials were contacted with letters during the scoping period. They did not have any concerns or issues. Therefore, I find the action will not affect local tribes.

Endangered or Threatened Species

I find that the proposed action with modification will not jeopardize the continued existence of any federally listed or proposed endangered or threatened species or their critical habitat, nor will it contribute to a loss of viability or a trend towards federal listing under the ESA of any USFS-listed sensitive species. The Biological Assessment (BA) and Biological Evaluation (BE) support this conclusion (see section 3.6 in the EA and the BA/BE in the project file). Conservation measures described in the EA will be carried out to minimize the effects of the proposed action on threatened, endangered, proposed, and sensitive species. Therefore, I find that the action can be carried out with no significant adverse effects to federally listed species.

Federal, State, and Local Laws or Requirements

I find that the proposed action with modification is consistent with federal, state, or local laws and requirements for the protection of the environment. Applicable laws and regulations are considered in the EA.

Findings Required by Other Laws and Regulations

I find that proposed action with modifications is consistent with federal, state, and local laws, regulations for the protection of the environment, and the Forest Plan.

ADMINISTRATIVE REVIEW OR APPEAL OPPORTUNITIES AND IMPLEMENTATION DATE

This decision is subject to appeal pursuant to Federal Regulations at 36 CFR Part 215. This project may start five days after the 45 day appeal period if no appeals are received. Appeals (including attachments) must be in writing and filed (regular mail, fax, e-mail, hand-delivery, express delivery, or messenger service) with the Appeal Officer within 45 days following the date of publication of this notice. The publication date of the legal notice in the newspaper of record is the exclusive means for calculation the time to file an appeal. Those wishing to appeal should not rely upon dates or timeframe information provided by any other source. Pursuant to 36 CFR 215.13(b) only those

individuals or organizations who submitted substantive comments during the comment period may file an appeal.

Where to file and appeal:

USPS	UPS, FED EX	FAX	EMAIL
Appeals Deciding Officer USDA, Forest Service Rocky Mountain Region P O Box 25127 Lakewood, Colorado 80225-25127	Appeals Deciding Officer USDA, Forest Service Rocky Mountain Region 740 Simms Golden, Colorado 80401 303-275-5296	303-275-5134	appeals-rocky-mountain-regional-office@fs.fed.us

APPEAL CONTENT REQUIREMENTS:

It is an appellant's responsibility to provide sufficient activity-specific evidence and rationale, focusing on the decision, to show why the Responsible Official's decision should be reversed. At a minimum, an appeal must include the following (CFR 215.14):

1. Appellant's name and address (CFR 215.1), with telephone number, if available;
2. Signature or other verification of authorship upon request (a scanned signature for electronic mail may be filed with the appeal);
3. When multiple manes are listed on an appeal, identification of the lead appellant (215.2) and verification of the identity of the lead appellant upon request;
4. The name of the project or activity for which the decision was made, the name and title of the Responsible Official, and the date of the decision;
5. The regulation under which the appeal is being filed, when there is an option to appeal under either this part or part 215, subpart C (CFR 215.11 (d));
6. Any specific change(s) in the decision that the appellant seeks and rationale for those changes;
7. Any portion(s) of the decision with which the appellant disagrees, and explanation for the disagreement;
8. Why the appellant believes the Responsible Official's decision failed to consider the substantive comments; and
9. How the appellant believes the decision specifically violates law, regulation, or policy.

Notice of Appeal that do not meet the requirements of 36 CFR 215.14 will be dismissed.

Pursuant to 36 CFR 215.9(a), if no appeal is filed, implementation of this decision may occur on, but not before, the fifth day from the close of the appeal filing period.

CONTACT PERSON

For additional information concerning this decision or the Forest Service appeal process, contact Sam Schroeder, Timber Staff Officer, Salida Ranger District, 325 West Rainbow Blvd., Salida, Colorado 81201, 719-5309-3591.

SIGNATURE AND DATE

/s/ William Schuckert _____ 04/03/07 _____
WILLIAM SCHUCKERT, DISTRICT RANGER Date

Responsible Official
Salida Ranger District
Pike and San Isabel National Forests
Cimarron and Comanche National Grasslands

RESPONSE TO COMMENTS

Introduction

The Forest Service received two comment letters during the public comment period. These comments have been documented, analyzed for content, and responses have been prepared. These responses are considered a part of the Environmental Assessment. Table D.1 lists the respondents and the identification number that was assigned to each letter for tracking.

D.1 Agencies, Individual, and Organizations Providing Comments on the Environmental Assessment for the North Trout Creek Forest Health and Hazardous Fuel Reduction Project

Respondent & Organization	Identification Number
Rocky Smith; Colorado Wild	1
Rand & Carol Sailor	2

Comments and Responses

This section presents all of the substantive comments received on the EA and the agency's response to those comments. Comments in favor of or against the proposed action or alternatives, or those that only agree or disagree with agency policy are not considered substantive. Substantive comments are defined as those that do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the EA;
- Question, with reasonable basis, the adequacy of the environmental analysis;
- Present reasonable alternatives other than those presented in the EA; or
- Cause changes or revisions in the proposal. In other words, they raise, debate, or question a point of fact or policy.

The comments are not presented in their entirety, but are available for public review in the project record.

Colorado Wild

Comment 1: SEVERAL TREATMENT UNITS ARE PROPOSED FOR AREAS WITH SEVERE SOIL EROSION POTENTIAL.

What measures would be applied to assist recovery of treated area? Various general methods, such as mulching, seeding, and repair of temporary roads are mentioned on pp. 75 and 77, but specific measures do not appear in either the design criteria (pp. 14-17) or the mitigation measures (pp. 24-27).

We strongly recommend that proposed treatment units in the areas with severe soil erosion hazard areas be dropped from the project. If they are not deleted, the Forest Service must show how the applicable measures in the Soil Management and Watershed Conservation Practices Handbooks would be met. It must also demonstrate that the project would not have an overall detrimental effect on soils in the short- or long-term.

Response 1: *Design Criteria 16 specifically states that we will follow the Watershed Conservation Practices handbook (page 15). Section 2.0 also specifically states that we will follow Colorado Forest Stewardship Guidelines: Best Management Practices (BMP) (page 14). Appendix A of the EA specifies road closures for new temporary roads and existing closed roads (reference page 18, paragraph 2 for the Proposed Action and Page 22, paragraph 7 for Alternate 3; both sections point to Appendix A for specific road closure treatments).*

Adaptive management practices will be used to address treatment areas that are not meeting the desired future conditions (reference page 27, paragraph 2.5.3.1).

Comment 2: THE NEED FOR TREATMENT IS OVERSTATED.

Comment 2A: Most of the proposed treatment is not in the highest priority areas for treatment.

…, most of the proposed treatments are not near private land, with some units more than a mile away from it.

…, much of the area where mechanical treatment is planned is also well away from the Forest Service-private boundary.

Response 2A: *The goal of hazardous fuel reduction is modify the fire behavior prior to a wildfire reaching the wildland urban interface. Modification of the fire behavior includes reducing the likelihood of crown fire initiation and crown fire sustainability. In addition to hazardous fuel reduction, the purpose and need also identifies forest health as one of the primary needs for the project (reference page 3, paragraph 1.2.2 and 1.2.3).*

Comment 2B: The higher elevation ponderosa pine of the project area probably did not have frequent fires.

We thus see no reason to reduce the basal area per acre of ponderosa stands to an average of 60 square feet per acre. Pages 5-6. This is a rather open stand, and the average BA probably should be 90 or above, given that the project area likely historically had some dense stands, as well as some open stands.

Response 2B: *High elevation ponderosa pine has a highly variable fire return interval. The objectives we are meeting by thinning these stands are focused on fire behavior modification. Our goal is to protect nearby properties, not just mimic historic events.*

The average basal area will be 60 square feet per acre over the treatment area, but will incorporate areas that are greater than 180 square feet BA with interlocking canopy

(dense) with areas with heavier thinning (more open), (reference page 2, Existing Condition; page 3, paragraph 1.2.2 and 1.2.3; and page 7 section 1.3.1 paragraph 6).

Comment 2C. Creation of openings in the forest canopy is not needed.

…, we see no reason to create "patch cuts" of up to 10 acres in lodgepole pine as proposed under proposed action Alternative B. Page 20.

Response 2C: *The role of openings in the forest structure is to provide the flexibility to meet the other objectives, as described in the desired future condition for the project, "Forests have diverse age structure, diverse species composition, old-growth communities, openings, standing snags, and down woody debris across forested areas and a vigorous understory of native grasses, forbs and shrubs where light allows (Forest Plan, pgs. III - 12)", (reference page 4, paragraph 2 and page 6, paragraph 1).*

Comment 2D: Treatment may damage ponderosa pine regeneration.

… there is no need to treat in the project area to ensure that a new forest will regenerate.

… the use of heavy equipment would certainly cause the death of a sizable percentage of the existing seedlings, as felling, skidding, and other operations would lead to seedlings being crushed, broken, or uprooted. Seedlings would absolutely be unable to survive burning, as it does not take much heat to kill a very small tree.

Response 2D: *The timber sale contracts list contract provisions for the protection of residual trees to limit damage to seedlings and saplings.*

Based on past experience, in many areas where regeneration is present, fire intensity is not sufficient to kill all the small trees during prescribed fire operations. The proposed action does state the existing regeneration will be protected where practical (r*eference page 20, paragraph 3).*

Comment 3: DESIGN CRITERIA FOR ABERT'S SQUIRREL ARE INADEQUATE.

…, leaving only one nest clump per six acres is clearly inadequate.[2]

[2] It does not matter that this measure appeared in the Forest Plan. See Plan at III-29. It was inadequate then and still is inadequate.

Response 3: *The proposed action would meet the Forest Plan standard for retention of nest tree clumps for Abert's squirrel. The treatment design would provide additional Abert's squirrel tree clumps. Trees would be thinned in a manner that creates clumps of trees intermingled with small, irregular openings or areas of lower tree density. For example, where Abert's squirrel sign (feed trees or nests) is present, a clump of three to ten trees that is three to twenty feet from the nearest neighboring tree could be left adjacent to an opening or area of low tree density, containing zero to three trees. The extent of these clumps is not known because it would be based partly on existing forest conditions and partly on observed use of existing clumps by Abert's squirrel. By retaining tree clumps for Abert's squirrel where they exist on the landscape and where they are*

currently being used by Abert's squirrels, sufficient habitat would be retained to provide for viable populations of this species (reference Forest Plan at III-29).

Abert's squirrel monitoring plots have been established across the forest, one of which occurs in the project area.

Comment 4: MANY SLASH DISPOSAL MEASURES ARE GOOD, BUT MODIFICATION IS STILL NEEDED.

… mechanically created piles 10 feet high may allow too long of a residence time of fires to allow conservation of soil properties. Since machine piles would largely consist of larger-diameter pieces, the piles would burn long and hot. We recommend limiting piles to be burned that are primarily composed of pieces larger than about three inches in diameter to about five feet high.

Response 4: *The majority of piles will be small (hand pile size) which reduces burning time and impacts to soils; larger material will likely not be put in piles but be used as firewood or left intact for coarse woody debris.*

Comment 5: ADDITIONAL COMMENTS ON DESIGN CRITERIA AND MITIGATION.

Comment 5A: Noxious weeds: … we generally agree with this, except that that an invasion of a new weed should be top or co-top priority.

Response 5A: *Thank you for your comment; we will consider this in implementation.*

Comment 5B: Raptor next exclusion: We recommend approximately one-quarter mile, at least for goshawk nests, as that species is absolutely intolerant of human presence near the nest.

Response 5B: *Specific exclusion areas would be determined by the Wildlife Biologist based on nest location and the proximity and type of the proposed actions. The timing of proposed actions would also be a consideration (reference page 15, Design Criteria 13 and 14 and page 64, paragraph 4).*

Comment 5C: Riparian buffer: Measure 17 seems to imply that a buffer of less than 100 feet could be established in some areas.

Response 5C: *This is true. The Fisheries Biologist or Hydrologist could specify circumstances where a 100 foot buffer would not need to be maintained.*

Comment 5D: Snag retention: we are pleased to see a requirement for retaining 40 snags or snag recruitment trees per 40 acres, and retention of all soft snags unless they are safety hazards. Page 16.

Response 5D: *Thank you for your support. The actual design criteria per the EA is 40 snags/recruitment trees per 5 acres (reference page 16, Design Criteria 25).*

Comment 5E: Depth of chips: Design Criterion 2 on p. 14 would allow chips to be spread over unspecified areas to a depth of two inches. This is acceptable, but we also

recommend a limit on how much area can be covered with chips to avoid the problems of retarding vegetation growth and possibly sending an acid pulse into soils.

Response 5E: *The purpose of allowing chipping is to provide flexibility in treatment of slash and other residue from thinning. Chipping areas would be very limited. In areas where chipping does take place, the location of chips would be random and widely scattered within unburned units.*

Comment 5F: Road Buffer: Design criterion 28 on p. 17 would establish a 200-foot road buffer in which there would be no mechanical treatment. But the last sentence says that hazard trees could be mechanically removed. This measure should be slightly reworded.

Response 5F: *We agree with your comment. This design criteria has been clarified and reads as follows:*

- *Hazard trees, defined as trees that pose a safety concern along the road corridor, may be mechanically removed.*

Comment 5G: Adaptive management: the interdisciplinary team would review treatment areas and implementation, and take steps to adjust treatments where the desired conditions were not being met. This is commendable.

Response 5G: *Thank you for your comment.*

Comment 6: MEET THE VISUAL QUALITY OBJECTIVES.

Response 6: *The visual quality objectives are addressed through out the EA (reference page 5, paragraph 2; page 8, paragraph 4; page 8, section 1.3.2 paragraph 2; page 9, paragraph 4; page 10, paragraph 1; page 10, paragraph 4; and page 11, paragraph 4).*

Comment 7: AVOID ROADLESS AREA ENTRY WITH MECHANICAL TREATMENT.

It appears that the proposed action would just enter the Buffalo Peaks Roadless Area 95 in section 23, township 13 south, range 78 west, north of Road 311. Map 2.3 in the EA shows a “Prescription B” unit there, which could include salvage, thinning, and prescribed fire. We recommend that the boundary of this unit be changed to ensure that mechanical activity in the Roadless Area would not occur.

Response 7: *You are correct. We unintentionally proposed mechanical treatments in the Buffalo Peaks Roadless Area. The approximately 270 acres of treatment has been changed to Prescription D: No Treatment. No roads will be built and no harvesting will take place within the Inventoried Roadless Area (IRA). See revised project maps 2.2 through 2.3 that include the boundary of the IRA and revised treatments. The polygons listed in Appendix B that changed will be modified to reflect the changes in the treatment prescription.*

Comment 8: MISCELLANEOUS

Comment 8A: Roads to Nowhere? Why are two new temporary roads proposed for crossing Chubb Park into no treatment areas? See EA Map 2.3. Another proposed temporary road appears to dead end in a no treatment area just northwest of Chubb Park.

Response 8A: Thank you for your comment. This was a mapping error and has been modified. Road segments to the no treatment area and treatment areas previously located in the IRA will not be used in this project (see REVISED Map 2.3).

Comment 8B: Aspen Damage From Cutting: Under prescription C in the proposed action, some mixed conifer stands with an aspen understory would supposedly be treated.

We recommend that treatment in this type of stand, if it exists, be reevaluated.

Response 8B: *This prescription pertains to areas that have succeeded to dominant mixed conifer type. If remnants of the aspen clone exist, the objective is to foster the regeneration of aspen in areas where aspen is declining or being replaced by conifers. The desire is to maintain a health aspen component in the project area (reference page 6, paragraph 2; page 6, paragraph 5; page 9, paragraph 4 & 5).*

Response 8C: Livestock Grazing: will livestock be kept off of areas after treatment?

We recommend that a design criterion or mitigation measure be added to require keeping livestock off treated areas for at least a full year after treatment.

Response 8C: *Design Criteria 9 addresses coordination with the Rangeland Management Specialist during prescribed fire operations to avoid conflicts with permittees and stress to the vegetation (reference page 10, paragraph 3; Page 15, Design Criteria 9). Additional coordination measures are addressed in the Range Allotment Management Plan (RAMPs) environmental assessment.*

Comment 8D. Electronic Submission of Comments: The Salida District should allow, if not encourage, electronic submission of comments. There was no address given for this on the inside front cover of the EA, which has instructions for commenting on the North Trout Creek project proposal.

Response 8D: *While the inside cover of the EA did not address electronic submission, it was available on the cover letter, press release and the legal notice.*

Rand & Carol Sailor

Comment 1: Alternative 2 – Proposed Action – Prescription B would be adequate-effective plan to start combating the problems in the North Trout Creek Project.

Response 1: *Thank you for your comment.*

Comment 2: We are however in opposition to the prescribed burning in the Southwestern portion of 4B (app.300 acres) and the Western portion of 4D (app. 200 acres) management areas.

As private landowners we secure no recourse if a controlled burn escalates into an uncontrolled burn.

Response 2: *Though many acres have been identified for prescribed fire, it is likely that prescribed fire will not be used on all acres because fire will not carry due to fuel loading, some areas are not accessible, and limited resources available to burn the areas. In addition, all prescribed fires are required to have a detailed prescribed fire plan. The prescribed fire plan is a detailed "instruction manual" for completing a prescribed burn; it includes detailed explanation on control measures to keep the prescribed burn where it is planned, weather and fire behavior parameters that determines when fire managers may burn the unit, smoke constraints, etc. The plan also identifies location of private property and mitigation measures to avoid escape fires onto private lands.*

Comment 3: We are also in favor of some salvage of the old growth timber, thinning in stands of heavily populated trees and some wood permits in areas close to established roads / trails.

Response 3: *Thank you for your comment. To clarify, no treatments will take place in old growth timber stands. Several of these units will be opened to the public for fuelwood between harvesting and burning treatments.*