CONSULTATION WITH OTHERS, AND LIST OF AGENCIES, ORGANIZATIONS & INDIVIDUALS TO WHOM COPIES OF THE STATEMENT ARE SENT

CHAPTER VI

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

OVERVIEW

This chapter discusses public involvement efforts and consultation with a variety of publics after release of the Proposed Forest Plan and Draft Environmental Impact Statement. It also displays the Forest Service response (or the action taken) to comments received during the formal 90-day public comment period for the Proposed Forest Plan and Draft EIS.

The first section of this chapter, CONSULTATION WITH OTHERS BETWEEN THE DRAFT AND FINAL EIS, summarizes the public involvement activities undertaken during the planning process and a compendium of the number, type and general tone of the responses received during the comment period on the Proposed Forest Plan and Draft Environmental Impact Statement. The second section, PUBLIC COMMENTS ON THE DRAFT EIS AND FOREST SERVICE RESPONSE, contains a summarization of the public comments extracted or paraphrased from the comments received. Similar comments have been grouped together and summarized or paraphrased. Each comment is followed by a Forest Service response. Comments directed toward a specific area of concern are grouped together under one category heading, i.e., Recreation, Timber, etc. A cross-reference at the beginning of this section ties each comment to one or more commentor, so that an individual commentor may easily find how each comment was addressed in the final documents.

Letters from government agencies and elected officials are reproduced in their entirety, with responses to points raised appearing as parallel text. This was done in accordance with Forest Service policy (Forest Service Handbook 1909.15), and does not imply that the Forest Service gives more weight to agency comments versus comments received from non-government individuals, organizations and firms.

The final section of the chapter, LIST OF AGENCIES, ORGANIZATIONS AND PERSONS TO WHOM COPIES OF THE STATEMENT ARE SENT, lists all those to whom copies of the Forest Plan, FEIS or Summary have been sent. This list was composed in response to administrative guidance, requests for copies, and commentors on the Proposed Forest Plan and Draft Environmental Impact Statement.

CONSULTATION WITH OTHERS BETWEEN THE DRAFT AND FINAL ENVIRONMENTAL IMPACT STATEMENTS

The Draft EIS, Proposed Forest Plan and Wilderness Study Area reports were filed with the Environmental Protection Agency September 22, 1982. The Notice of Availability was published in the Federal Register September 24, 1982. Availability of the documents was also announced through local and regional news media. Over 700 copies of the DEIS and Proposed Forest Plan were distributed to interested persons, as well as approximately 830 copies of the Summary.

As a result of public request, open houses were scheduled in Lakewood, Salida and Pueblo, Colorado on October 12, 13 and 14, 1982 prior to the Wilderness Study Area Public Hearings. Table VI-1 displays the first series of open house meetings to discuss the Proposed Forest Plan and Draft Environmental Impact Statement.

Formal Public Hearings were held in Alamosa, Salida and Colorado Springs, Colorado, October 18, 19 and 20, 1982 for the eight Wilderness Study Areas (4 USDA, Forest Service and 4 Bureau of Land Management). The response period for the public hearing record was extended to December 15, 1982 (which is beyond the required 30 day period) to provide an opportunity for written statements to be included in the hearing record. Table VI-2 displays the schedule of hearings and attendance for Wilderness Study Areas. In the cross-reference at the beginning of this section, commentors presenting oral statements at Wilderness Study Area public hearings may be located by the following: statements made at the Alamosa hearing are numbered W-610 through W-648; Salida, W-563 through W-576; and Colorado Springs, W-654 through W-698 and W-700.

Detailed information regarding these meetings and hearings is extremely lengthy (approximately 400 pages) and is not included with this document. It is available for review as part of the planning record in the Pike and San Isabel Forest Supervisor's office and is incorporated by reference into this document.

In November 1982, open houses were held in twelve Colorado towns throughout the planning unit to again provide the opportunity for discussion of the Proposed Forest Plan Draft Environmental Impact Statement and Draft Wilderness Study Area Reports. Table VI-3 displays the open house schedule and attendance.

A total of 1,058 comments were received from individuals, organizations and agencies on the Draft EIS, Proposed Forest Plan and Draft Wilderness Study Reports. Comments were received in various formats including letters from persons of varied interests, petitions from organizations and user groups, form letters from universities and clubs, transcripts of oral statements made at the public hearings, and drawings from elementary school students.

TABLE VI-1

SCHEDULE AND ATTENDANCE
FIRST SERIES OPEN HOUSE SESSIONS

LOCATION	DATE	ATTENDANCE
Salida Ranger District Office 230 West 16th Salida, CO 81201	10/12/82	3
Forest Supervisor's Office 1920 Valley Drive Pueblo, CO 81008	11/13/82	1
South Platte Ranger District Office 393 South Harlan, Suite 107 Lakewood, CO 80226	11/14/82	3

Seven persons registered at the first series of open house sessions.

TABLE VI-2

SCHEDULE AND ATTENDANCE
WILDERNESS STUDY AREA PUBLIC HEARINGS

LOCATION	DATE	ATTENDANCE	ORAL STATEMENTS
Adams State College Carson Auditorium Alamosa, CO	10/19/82	100	39
Salida High School Auditorium Salida, CO	10/21/82	28	16
Holiday Inn North Centennial III Room Colorado Springs, CO	10/21/82	143	45

A total of 271 persons registered at the Wilderness Study Area public hearings for Sangre de Cristo, Spanish Peaks, Buffalo Peaks, and Greenhorn Mountain WSA's and 100 persons made oral statements.

TABLE VI-3

SCHEDULE AND ATTENDANCE
OPEN HOUSE SESSIONS

LOCATION	DATE	ATTENDANCE
South Platte Ranger District Office 393 South Harlan, Suite 107 Lakewood, CO 80226	11/15/82	17
Public Service Building Leadville, CO 80461	11/16/82	69
South Park Ranger District Office Jct. Highways 9 & 285 Fairplay, CO 80440	11/17/82	3
Salida Ranger District Office 230 West 16th Salida, CO 81201	11/18/82	8
San Carlos Ranger District Office 248 Dozier St. Canon City, CO 81212	11/22/82	4
Holiday Inn North Fillmore & I-25 Colorado Springs, CO 80907	11/23/82	8
Comanche National Grassland 212 East 10th Springfield, CO 81073	11/29/82	5
Forest Supervisor's Office 1920 Valley Drive Pueblo, CO 81008	11/30/82	13
La Veta Work Center SW Corner of Field & Main Streets La Veta, CO 81055	12/8/82	8

A total of 135 persons attended the nine open houses.

After the comment period closed on December 15, 1982 the comments received were read and analyzed. Oral testimony given at Wilderness Study Area hearings was considered to be comments on Wilderness Study Area issues. Responses were prepared for all comments determined substantive by the Forest Service. Changes made in the Forest Plan and Final Environmental Impact Statement in response to public comment were based either on a management decision to change direction, or to clarify portions of the documents. Changes made in the Forest Plan and Final Environmental Impact Statement are summarized in the section, *CHANGES BETWEEN THE DRAFT AND FINAL* EIS, in Chapter I of the FEIS. Comments and the accompanying responses are found in the following section of this chapter.

Generally, comments for which responses are included are those which asked specific questions or made statements that required clarification.

The analysis and evaluation of public comment considered all comments both individually and collectively to determine common areas of concern and geographical distribution. It also was used to evaluate the variety and intensity of viewpoints about ongoing and proposed planning and management standards and guidelines.

Responses received on the Draft Environmental Impact Statement, Proposed Forest Plan and comments received from Wilderness Study Area public hearings totaled 1,058. Comments specifically directed toward wilderness designation or management totaled 698. Three hundred sixty were directed to Forest management.

Content Analysis

Comments were summarized into specific subject categories for analysis and classification. The following displays a brief summary of all comments directed to each category.

Alternative A The majority of commentors were concerned that this alternative would be too expensive to implement and could cause extensive damage to Forest resources.

Alternative B Comments on this alternative stated that current management should be continued.

Alternative C Commentors recommended this alternative because they felt it would strike a better balance between timber supply and demand and it included more area for wilderness.

Transportation System Many commentors opposed any increase in road construction for timber harvest and mineral exploration and development. While others, opposed to new construction, expressed concern about Forest roads being closed to motorized travel. Others expressed concerns about the amount of trail construction proposed.

Timber Commentors expressed concerns about clearcutting, timber harvest for water yield and amount of timber to be harvested in Lake County.

Wildlife The majority of comments received on wildlife were directed toward the importance of protecting wildlife habitat, and concern about producing adverse impacts on populations. Several commentors expressed the need to expand the Management Indicator Species list in the final Plan.

Minerals Commentors were primarily concerned that exploration and development for minerals would cause adverse effects on wilderness, water quality, visual resources, and wildlife. On the contrart, many commentors felt there was a need to continue exploration and development for future energy needs.

Recreation Commentors were almost evenly divided for and against ORV activities. Some were concerned about the need to close areas to motorized use, while others were equally concerned that not enough area was open to motorized vehicle enthusiasts.

Other commentors felt there were adequate developed winter sports sites, while others expressed a desire for increased developed recreation sites, such as new and expanded ski areas.

Soils Commentors expressed concerns about maintaining soil stability associated with mineral development and ORV use.

Water Throughout the comments received water quality was of primary concern. Commentors expressed the need for maintaining and improving water quality.

Economics Several commentors felt the economic analysis was heavily skewed in favor of commodity producing resources.

Planning Process Some commentors expressed a concern that the DEIS failed to describe a range of alternatives required by NEPA and CEQ.

Visual Quality Almost all commentors expressed the need to maintain visual quality in all activities throughout the National Forest.

Wilderness The majority of comments received talked about maintaining all existing wilderness and to limit or prevent oil and gas exploration and development in wilderness.

Wilderness Study Areas A large percentage of the commentors indicated they wanted all Wilderness Study Areas recommended for inclusion in the National Wilderness Preservation System.

Some commentors felt there was enough wilderness now and these lands should be available to those citizens unable to hike to enjoy them.

Sangre de Cristo Wilderness Study Area Commentors expressed the need to recommend this Wilderness Study Area for inclusion in the National Wilderness Preservation System. Many wanted boundaries extended beyond the Forest Service proposal, while others felt there were areas that should be excluded.

Spanish Peaks Wilderness Study Area Many commentors felt this area should be designated wilderness to protect the unique geologic formations near the base of the peaks.

Buffalo Peaks Wilderness Study Area Commentors indicated a desire to designate this area wilderness to provide protection for wildlife (bighorn sheep and elk).

Greenhorn Mountain Wilderness Study Area Commentors strongly supported wilderness for this area.

Lost Creek Further Planning Area Commentors supported this area for wilderness designation.

Cultural Resources Commentors expressed the need to identify and protect historic and cultural sites.

Over 1,000 responses were received on the Draft EIS and Proposed Plan. As stated earlier in this chapter, those responses were submitted in various formats. Letters received from individuals or organizations were summarized. This authority is within the guidelines established by NEPA (40 CFR 1502.9(b) and 1503.4). Transcripts of oral statements recorded at the Wilderness Study Area hearings were incorporated in the analysis and treated in the same manner as letters received from individuals. Responses received in the format of petitions and form letters were included in the analysis procedure. Drawings from elementary school students are not displayed in this FEIS.

All public comments received on the Draft EIS and Proposed Plan were incorporated in the analysis and are available for public review at the Forest Supervisor's Office, Pueblo, Colorado.

Table VI-4 displays alphabetically the commentor name and assigned number. After locating commentor name and assigned number, the reader is encouraged to review Table VI-5. Table VI-5 displays numerically the commentor name and assigned number, as well as the numerical section and alphabetical code of the individual comment.

TABLE VI-4 COMMENTOR NAME AND ASSIGNED NUMBER

NON-GOVERNMENT INDIVIDUAL	ASSIGNED NUMBER
(Illegible),	W-588
(illegible), Dana	W-497
(illegible), Greg	W-514
(No Name),	F-78
(No Name),	W-260
Abbott, Charles Barnes	W-295
Abbott, Mrs Scott	F-17
Abila, Denise	W-249
Addison, Laura	W-444
Aguirre, Lisa	W-238
Allen, Wesley C	W-553
Ambler, Jr , Richard J.	W-131
Andersen, Larry	F-49
Anderson, Denise	W-217
Anderson, John	FW-6
Anderson, John	W-516
Anderst, Daryl	F-123
Andreae, Jo	W-368
Andrews, Robert	W-215
Andrews, Steve	W-16
Antiel, Robert	W-618
Antiel, Robert D	W-12
Archuleta, Brandon	W-237
Archuleta, T Hubert	W-23
Armagast, Robert & Judy	W-558
Arnold, Brett	W-543
Atencio, Toby	F-101
Atwood, James	F-172
Augensen, Brenda	W-286
Austin, Andrew	W-335
Austin, April	W-143
Bachman, Donald	W-462
Badney, Glenn H	W-48
Bagdal, Brenden	W-363
Bailey, Stella	W-448
Baker, Agnes	W-446
Baker, Beverly & Tony	W-474
Baker, Don & Mary	W-443
Baker, Mavis	W-250
Bakey, Thomas	W-395
Baldwin, Montana	W-244
Ball, Al	W-503
Ball, Dr & Mrs Wendell	F-290
Ball, Jennifer E	W-128
Bandy, Carl	W-681
Barber, Debbie	F-158
Barber, Jim	F-166
Barnes, Caroline	W-336
Barnhart, Ross	W-693
Baron, Michael	W-688
Barrett, Leslie	W-218
Barringer, Eli	W-318
Bartaczewiz, Laurie	W-65
Bartlett, Juniper	W-261
Bartlett, Tammy	W-657
Barton, Suzanne	W-291
Basinger, Jeffrey	W-431
Batting, Bruce	W-20
Batz, Gretchen	W-216
Batz, Roger	W-308
Beach, Silva	W-245
Beach, Willis & Sharon	F-328
Beachman, Marian L.	W-75
Bean, David L	W-298
Becknese, Eileen	W-304
Bedinger, Barbara F.	W-7
Beinhott, Gregory	W-332
Bemis IV, Hern	W-340
Bendetti, Robert	W-102
Bennett, Linda	W-484
Berga, Jack	W-473
Berger, Bruce	W-552
Berkenbaugh, Carol A	W-96
Berner, Elsa	W-9
Berwick, Catherine H	W-407
Beyer, Jim	W-528
Bickford, Pamela	W-284
Black, Tila	W-376
Blanke, Marguerite	F-62
Block, Celia	W-186
Block, Suzanne	W-169
Bobs, Linda	W-393
Bock, Jim	W-477
Bohaker, Linda	W-358
Bol, Keith & Lisa	W-208
Boles, Darin	W-510
Bollhoefer, Kathy	W-463
Bollinger, Marcus	W-327
Boone, Chris	W-157
Borrow, Jo Ellen	W-271
Bors, Steve	W-36
Bosley, Elizabeth C	W-51
Bosley, Mark	W-659
Bost, Charles	F-189
Bottcher, Bud D	F-119
Bottineau, Charles J	F-210
Bouchard, Edward M.	L-16
Bourcier, Suzanne E	W-122
Boyman, John	W-137
Boynton, Steve	W-379
Braatz, Dana	F-283
Bradford, Brant A.	F-105
Briggs, Jeff	W-556
Briggs, Wendy	W-595
Bright, Leaf	W-612
Bright, Leon	W-605
Brinkley, Vernon	F-103
Brinza, Nancy	W-101
Bristol, Laura	W-607
Brodbeck, Steve	W-141
Brodie, Audrey	W-498
Brook, Kay A	F-113
Brown, Brett Allan	W-331
Brownsword, Mr & Mrs John	W-199
Brunger, Dennis	F-94
Brunger, Patti	F-216
Brunger, W H.	F-112
Brusberg, Joy	W-307
Bry, Carrie	F-54
Bryant, Mark	W-545
Bryce, Carmen	F-55
Bubendorf, Bonnie	W-198
Buchanan, Percy Anne	W-319
Bullwinkle, Alden	W-289
Bullwinkle, Susan	W-348
Burbaink, Brook	W-537
Burdick, Larry	F-122
Burgess, Margaret	W-8
Busey, James L	W-109
Busey, Jim	W-697
Busey, Marian	W-696
Bushong, Sarah	W-387
Butler, Andrew	W-586
Buzzell, Margaret E	W-144
Byers, Kerry Sue	W-3
Byrd, Ethel	W-372
Cabrera, Alicia	W-173
Campbell, James	F-184
Campbell, James	W-652
Campbell, John	W-258

Table VI-4 continued

NON-GOVERNMENT INDIVIDUAL	ASSIGNED NUMBER
Campbell, Lisa	F-121
Campbell, Stephen & Shirley	F-333
Cardinas, Cary Linn & Ron	W-551
Carle, Mr & Mrs	F-337
Carlin, James	W-398
Carlsen, Beth V	W-94
Carnesciale, Dan	W-277
Carter, Marsha	F-341
Carter, Mrs Frances C	F-14
Carter, Nicky	W-254
Carter, Nicky	W-633
Carter, Nicky	W-672
Carter, Sarah	W-259
Casey, R W.	F-126
Caudill, Larry	L-15
Cevaal, John	F-266
Chafee, Ann	W-6
Charlton, Jr , Robert C.	W-288
Cherbeneau, Louis & Alice	W-560
Childress, J	F-149
Childs, Michael	W-478
Chisholm, Marie	F-34
Christmas, Richard J.	F-253
Ciesielski, Carol	W-447
Cirullo, John	F-39
Cisneros, Dolores	W-247
Cisneros, Rebecca	W-263
Citron, Chris	W-91
Civil, Robert	F-52
Clane, Ellie	W-323
Clark, Jeffery	W-140
Clark, Melanie	W-314
Clark, Pat	W-676
Clark, Seort	W-145
Clayton, Thomas	W-321
Cleres, J.	F-124
Clifton, Charles	W-680
Cliver, Keith	W-62
Clough, Steve	W-79
Coates, William	F-30
Cochran, Ron & Pam	F-36
Coleman, Christa	W-377
Coleman, Miles & John	W-559
Collins, Brian	F-300
Conlin, Mike	F-240
Conner, Louise	W-227
Cook, Raimon	F-196
Cook, Richard N.	W-425
Cool, R.W.	F-339
Cooper, Christie J.	W-178
Cornell, Jack	F-98
Corya, MaryRuth	W-485
Cosgriff, Peter	F-160
Couchman, Tom	W-459
Coury, Tansy	W-265
Craig, Dedrie S	F-271
Creamer, Dennis	W-93
Crone, Marie	W-542
Crum, Sally	F-191
Cryer, III, John	W-610
Cummings, Dale	W-309
Cundiff, Dr. Joyce C	W-222
Cundiff, Thomas	W-219
Cunningham, Kirk	F-18
Daly, James L	W-41
D'Ambrosia, Sara	W-262
Dangremond, Shari	W-426
Davidson, James	F-107
Davis, A L	F-9
Davis, Gerald	F-308

NON-GOVERNMENT INDIVIDUAL	ASSIGNED NUMBER
Davison, Keith	W-281
de Steiguer, R A	F-209
Dearloun, Timothy	W-374
DeFrisco, Lesleah L.	W-404
DeHerrera, William	F-233
Deisham, William	F-186
Dell, Barbara	W-31
Dell, Barbara	W-678
Dell, Barbara A	W-22
Dentsih, Jeffrey	W-345
Diamond, Bruce	F-294
Diamond, Debbie	F-295
Dickinson, Doug	W-312
Dickinson, June	W-311
Diemer, Corinne	F-161
Dils, Reed	W-574
Dils, Reed & Karen	W-111
Dimond, Jennifer	W-241
Dittman, Heidi A.	W-300
Dixon, King	W-583
Dixon, Mark E	W-58
Dobson, K D	F-273
Domingue, John	W-460
Dornbush, Kirk	W-32
Dowell, Sakeina	W-155
Dowling, Bob	W-600
Downing, Walter C	W-27
Doyle, Richard	W-644
Dralle, Denise	W-665
Dries, Thomas J	F-116
Dunbar, Wendy	W-320
Dunn, Christina	W-121
Dunn, Glenda	F-331
Dunsmore, Bob	W-635
Durland, Brook & Eric	W-519
Durland, Brooke & Eric	W-468
Durrum, Marge	W-625
Durrum, Margi	W-10
Dustin, Charles B	W-554
Dyer, C	W-507
Eddington, Leslie	W-159
Edelmaier, Leland R.	W-56
Edlund, Alvin	W-564
Edlund, Jr , Alvin	W-228
Egan, Tom	W-4
Ehmke, Heather M.	W-138
Eisele, Peter	W-686
Eldridge, Connie	W-270
Ellewberger, Jim	F-318
Elliott, Leslie	W-136
Ellis, Kurt	F-73
Ellis, Rita	F-74
Elnore, John D	W-85
Endrizzi, Ernest	W-647
Engelhardt, Don	W-53
Engler, Vicki	W-37
Errend, Richard	W-383
Evans, Susie	W-17
Everett, Jessie K.	W-429
Evins, Toni	W-1
Fairbanks, Warren	W-432
Fanta, Alan	W-382
Farady, Michael	W-538
Farrell, Tracy	W-296
Faurot, John	W-483
Fay, Bernie	W-544
Felch, Judith	W-310
Felschow, Fred	W-285
Fleck, Nat	W-423
Fleen, Gary	W-161

Table VI-4 continued

NON-GOVERNMENT INDIVIDUAL	ASSIGNED NUMBER
Flint, Timothy	W-154
Flor, Scott	W-571
Florschutz, Henry	F-336
Fluehr, Nick	W-64
Foley, Eleanor C	F-268
Follies, Elaine	W-305
Foltz, Beverly	W-521
Fonda, Jr Stewart H.	F-114
Forst, Stacy L	W-282
Fowler, Electra	W-229
Frances, Sammy	W-451
Francis, Christie	W-276
Francis, Steve	W-388
Frank, William C	F-254
Franklin, Craig	W-627
Frederick, Joel	W-371
Freeman, Wendy	W-160
Freund, Douglas	F-185
Freville, Augie	F-229
Freville, Mary A.	F-228
Friedman, Steve	W-95
Friesen, Valerie	W-413
Fritz, Lorraine	F-291
Froehliek, Rick	W-389
Fuehrer, Roger	FW-5
Fuller, Mary Ann	W-409
Fuller, Steven	W-408
Fullilove, William	W-391
Fulreader, Gary	W-326
Gale, Greg	W-662
Galindo, Nayibe	W-500
Gamauf, Kenneth	W-14
Gamble, Don	F-159
Garges, Lee D	W-329
Garrison, David	W-74
Gatehouse, Holly	W-125
Geer, Elizabeth	F-21
Gentry, Gary R.	W-420
Gibian, Scott	W-349
Giffin, Teresa	W-569
Gilette, Steven	F-222
Gillis, Tom	L-10
Gnadt, Paul	F-51
Gomez, Chris	W-232
Goodlette, Alice T.	W-89
Goodwin, Lonnie D.	F-311
Goss, B Stanley	F-171
Grace, Evan	W-255
Graham, Patricia	F-86
Green, James	F-203
Green, Janet L.	F-206
Green, Stewart	W-414
Greer, Peter	W-401
Groth, Cathy	W-589
Grow, Glenn	W-290
Grown, Jr , J David	W-214
Gubrud, Ed	W-687
Gubrud, Edward	W-536
Guidici, Christi	F-274
Gumaer, Dorothy	W-517
Gutierrez, Walter R	F-152
Gylling, Ivan	W-642
Habecker, John	F-187
Habighorst, Alfred	F-130
Habighorst, Dale	F-128
Hacket, Marilyn	FW-2
Hadman, Joe	W-269
Hagenlochen, Christian	W-386
Hall, Julie	W-278
Hall, Marily	W-402
Hall, Mrs A. William	W-464
Hallahan, Kathy & Ruth	W-104
Hallam, Mary	W-427
Hamilton, Holly	W-364
Hammond, Jaysun	W-639
Hanna, Daniel	W-171
Hansen, Lisa	W-359
Hansen, Stacey	W-170
Harber, Bella	L-17
Harkness, Geogine	W-575
Harper, George	W-272
Harris, Bruce	W-129
Harrison, Douglas	W-357
Harvey, Dennis	F-66
Harvey, N E.	F-325
Hatton, Clinton	W-164
Haulman, Iliff & Geraldine	F-310
Haurwitz, Frank	W-416
Hauser, Clay	F-139
Hawkins, Bill	W-299
Hayes, Deborah	W-99
Haynes, Bill	W-616
Heatwole, Jr., James L.	W-193
Hecht, Bella	W-533
Hecht, Bella Barbara	L-12
Hedgepeth, Janet	W-175
Hediger, Jean	W-71
Heinonew, Kristin	W-233
Heinrichsdorff, Gernot	W-57
Heister, Katherine	W-424
Hemphill, Jeanne T.	F-63
Henley, Merritt	W-180
Henrikson, Carl	W-47
Hepps, Debra	W-492
Herman, Scot	W-599
Hicks, Jeanne	W-438
Hill, H.L.	F-13
Hillman, Carolyn	W-325
Hinderlider, Lisa	F-314
Hix, Donald	F-327
Hoban, Maureen	F-188
Hockett, Earl	F-115
Hockett, Lee W.	F-137
Holden, Alison S.	W-339
Holden, Janey	W-513
Holder, John	W-520
Holland, Thomas M	W-52
Holt, Susan	W-66
Honicky, Chris	W-72
Hopkins, Tish	W-303
Hotchkiss, Walter	F-252
Hotchkiss, Walter	W-417
Hovland, Otelia	F-56
Howe, Alice H.	W-531
Hren, Anthony A	F-262
Hudson, William	W-603
Hummell, Austin	W-397
Humr, Roger	W-581
Husak, Sally	W-77
Iren, Muhng	W-149
Irvine, Teresa	F-68
Ivers, Dana	W-522
Ives, Georgie	W-313
Jackson, Amy	W-369
Jacobs, Mary-Heinle	W-106
James, III, Alfred	F-241
Jason,	W-234
Jaylor, Dyan M	W-341
Jennings, Ralph	W-626
Jensen, Bruce	W-434

Table VI-4 continued

NON-GOVERNMENT INDIVIDUAL	ASSIGNED NUMBER
John, Larry	F-80
John, Mary	F-90
Johnson, Curtis	F-174
Johnson, Janet	W-117
Johnson, Jim G	F-142
Johnson, Linda	W-120
Johnson, Nina L.	W-97
Johnson, Tim	F-177
Johnson, Timothy A.	W-132
Jones, Liz	W-52
Juergens, Cheri	W-69
Kalivoeda, Deborah	F-243
Kaspar, Stephen	W-499
Kaufman, Joel	W-645
Kayo, Jana	W-231
Keahey, Lynne	W-613
Keith, Evelyn S.	W-11
Kelly, Jan	W-699
Kenagy, Linda	W-42
Kenagy, Linda	W-661
Kestler, Art	W-68
Kiarsis-Starrett, Marilyn	W-2
Kilk, Janet	W-183
Killerman, Kenneth	F-129
King, Bill	W-465
King, Jessie	F-11
Kingery, Hugh	F-60
Kinniry, Janet	W-648
Kinniry, Janet	W-653
Kiowaltasea, Geraldine	W-396
Kirk, Dale	F-88
Kirkegaard, Arnold	F-217
Kithemny, Pat	F-280
Kline, Pamela	W-439
Kolker, Marci	W-577
Kooker, Beverly D.	F-245
Kooker, Harley E.	F-244
Kornher, Steve	W-643
Koval, MD, Ira J.	W-195
Krag, Peter W.	W-49
Kranz, Kristine	W-316
Krause IV, Paul	W-306
Kreutzer, Gary	W-638
Kreycik, Jacob	W-194
Krimm, Hans	F-214
Krimm, Hans	W-663
Krucutz, Wendy	W-353
Kubaiujn, Peter	W-505
Kugas, Stephen	W-579
Kulyan, Rosemarie	F-212
Kurtz, David	W-172
Lacy, Roger	W-324
Lacy, Ruth	W-116
Lamb, Joyce H	W-25
Lamb, Rose W	W-24
Lamplighter, Jaggie	W-211
Landes, Sam	W-177
Landsbach, Jeff	F-120
Lane, Lorraine	F-12
Lane, Lorraine	W-19
Lane, Mrs Hertha P.	W-88
Lane, Steven R.	F-133
Lapish, Patricia L.	W-135
Law, Sara Christine	F-293
Lawrence, Nancy	W-212
Lay, Michael	F-319
Leever, Randall D	W-529
Ley, Charles V	F-135
Ley, Michael	F-198
Lien, Ann	W-148
Light, Sara Jane	F-207
Ligner, James	W-86
Linder, Kay	F-316
Lindley, Craig	W-206
Lindsay, Leigh Ann	W-150
Linn, Paula	F-165
Loeffler, Bruce	F-205
Long, Allen & Connie	F-208
Longnecker, Daniel	W-410
Longstreath, Don	F-219
Loomis, John B	W-28
Loop, Johnnye Dee	W-535
Lopez, Alfredo	F-169
Lopez, Francie	W-467
Lovelady, Kristi L.	W-156
Lowen, Jan	L-14
Lucas, David	F-32
Lueg, Melora	W-378
Lundgren, Eric	F-58
Luoma, Frank	F-44
Lyall, Robert	F-281
Lynds, George	F-146
Maass, Betty Jane	F-24
Maass, Walter	F-61
Maass, Walter J	F-28
MacDonald, Donald	F-234
Mace, Kent	W-617
MacIndoe, Charndser	W-230
Maestrelli, John	F-147
Maier, Nell	F-19
Malsi, Russell S.	F-182
Manher, Joel	W-344
Marks, Tudor & Pamela	W-55
Maron, Richard J	W-458
Marshall, Helen B.	W-342
Marshutz, Peter	W-192
Martin, Christopher	W-210
Martin, Mary	F-106
Martin, Michael	W-591
Martin, Mr & Mrs. Donald	W-70
Martin, Pamela	W-365
Martinez, Alan	W-246
Martinez, Gerald	W-235
Martinez, Robin	W-264
Martorano, Marilyn	W-609
Mary, Sandra	W-152
Mason, Geoffrey	W-664
Mason, Robert	F-132
Mason, Susie	W-202
Mason, Susie	W-203
Masten, Lois	W-351
Masterson, Henry	F-136
Masterson, John	F-125
Matheny, Diane J	W-196
Matthews, Richard	W-566
Mazel, David	W-611
Mazel, David & Annie	W-18
McCain, Joseph	W-470
McCain, Rosalyn	W-623
McCain, Theresa	W-415
McClellan, Rosalind	W-532
McClellan, Rosalind	W-670
McClintick, Mark	W-362
McConkey, Andrew	W-660
McCoy, Amy L	W-87
McCoy, Jean	F-324
McCoy, Kathi	W-280
McDonald, Richard	W-565
McElhattan, Bernard D.	F-181
McHain, Marcia	W-185

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NON-GOVERNMENT INDIVIDUAL	ASSIGNED NUMBER
McKenna, Thomas P	W-488
McKenzie, P J.	W-360
McKinnon, George E.	W-90
McLendon, W C.	F-236
McNeil, Tim	F-151
Meadows, Jan	W-39
Meadows, Jan	W-630
Means, John	W-207
Meardon, Ronald	W-615
Meardon, Ronald J.	F-64
Meek, Donald	F-118
Meek, Donald	F-317
Meeks, Mark	W-411
Meese, Morris E.	M-134
Mehlhaff, Larry	W-675
Melville, Ann	W-114
Meokins, Viola P	W-112
Mercy, Scott L.	W-103
Merriman, Suzann	W-506
Meyer, Thomas & Carol	F-230
Meyers, Eric	W-297
Miller, Beth	F-275
Miller, Dan	F-315
Miller, Debbie	W-629
Miller, Linda M.	W-151
Miller, Mark	W-631
Miller, Pam	W-582
Milton, John P.	W-428
Miner, Polly	W-182
Molley, Peter	F-242
Montgomery, H.R.	FW-4
Moolenaar, Claire	W-191
Moolenaar, Diane J.	W-190
Moon, Lauren	W-495
Mooney, III, Rev. O. J.	F-1
Moore, James & Judith	W-406
Moore, John Allen	F-332
Moore, Theodore	W-572
Moore, Theodore A.W.	FW-1
Morgan, Susan	W-568
Morrow, Mindy	F-144
Moses, Evalyn V.	F-231
Moses, Matt	F-226
Moyer, Russell & Anne	F-292
Mulford, Patty	W-184
Mullen, Norm	W-692
Murphy, Bill	W-584
Murphy, Mark	W-490
Myer, Hugh	F-72
Mykleby, Jim	F-167
Naatz, Robert	W-677
Naatz, Robert F.	W-21
Nall, Chris	W-450
Nedell, Bill	W-73
Nelson, Doris	F-83
Nelson, Gene	F-81
Nelson, Laura L	W-370
Neufield, Harold	F-334
Newark, Diana	W-110
Newberger, Scott	W-489
Newell, Donna	W-381
Nicholl, Krista	W-119
Nissen, Lyle	W-61
Nissen, Lyle	W-634
Niznik, Albert J.	W-59
Noel, Joni	W-491
Norgren, Kim	W-646
Novak, Lisa	W-673
Novak, Stephen	W-375
Novosel, C John	F-141

NON-GOVERNMENT INDIVIDUAL	ASSIGNED NUMBER
Nuhn, Gertrud	F-27
Nye, Mr & Mrs Robert	F-176
O'Brien, Peter	W-622
Oehmig, Keith	W-354
Oehming, Jr , Dunkar	W-187
Oliver, Janet	W-691
Olsen, Kenneth	F-194
Olsen, Kenneth	F-195
Olson, D Linda	F-67
Olson, Daniel	F-87
Olson, Linda	F-77
O'Neal, Merilee	F-50
O'Neal, Merilee	F-326
O'Neill, Reva	F-43
Orn, Katherine	W-279
Ortiz, Jan	W-394
Oruck, Samuel	W-512
Pacheco, Bernard	F-75
Pagel, Jim	F-91
Pagel, John	F-108
Pagel, Josette	F-97
Pair, Michael	W-606
Palmer, Philip	W-501
Parker, Donald	W-666
Parker, Kathleene	W-419
Passey, Linda	W-268
Paulsen, Ruth	W-67
Pearson, Kari	W-146
Pearson, Mark	W-555
Penzel, Thomas	W-54
Peters, Mark	W-267
Peters, Mark	W-689
Petersen, Kristin	W-515
Peterson, Charlie	W-695
Peterson, Judith	W-602
Phillips, Jack	W-392
Phillips, Janet	W-540
Phillips, Jim	W-649
Plummer, Anne	W-442
Pohl, Thomas & Elizabeth	W-209
Pohle, Linda	W-412
Polburn, Jay	W-578
Polite, Cindy	W-422
Polt, Martin	W-594
Pool, Edith	W-456
Porter, Donna	F-309
Potter, MD, Donald E.	W-479
Powell, Dave	F-197
Powers, Bruce	W-421
Powers, Nancy	W-624
Prais, Irving	W-669
Prince, Betty Salisbuny	W-481
Puhl, Karen S	F-127
Pullin, Jackie R.	W-60
Pyle, Thomas A	W-63
Queely, George	W-366
Quintana, Eric	W-243
Raap, Shelley	W-480
Rampton, Thomas G	W-40
Randolph, L.	W-13
Randolph, Larry	W-637
Rankin, Aline	F-190
Rapp, Frieda	W-338
Redfern, Lisa	W-179
Redfern, Robert	W-162
Redfern, Sandy	W-158
Reed, Dale	W-457
Reed, Melinda	W-454
Reeves, Jennifer W.	W-83
Rehmeyer, Robin	W-403

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NON-GOVERNMENT INDIVIDUAL	ASSIGNED NUMBER
Reigle, Randy K	W-113
Reitherman, Genevieve	W-115
Reitherman, Laura	W-197
Remilland, Judi	W-147
Remillard, Janine	W-153
Remillard, Suzanne	W-224
Rendall, Donald	W-671
Rennicke, Jeff	W-658
Reyes, Gwen	W-433
Reynolds, Richard	W-476
Richard, Lou	W-585
Richardson, Jonathan L	W-81
Richmond, Don	W-38
Richmond, Don	W-619
Riffert, David	W-293
Riffert, Stephen	W-292
Ritchie, Pam	W-134
Ritter, Michelle	W-168
Roberts, Victor	W-334
Robieson, James	W-539
Rohrer, Bonniesue	W-201
Rohrer, Robert	W-126
Romeyn, Peter	F-99
Roney, Lori	F-59
Ross, Eugene & Mary	F-156
Ross, Hershell & Margaret	F-162
Ross, Kim	W-165
Ross, Lester	F-45
Ross, Mr. & Mrs. Thomas	W-108
Ross, Reinhart	W-315
Rowell, Melissa	W-322
Ruble, Wade	F-297
Ruck, Peter	W-641
Rusch, Elgin	F-312
Rutledge, Thomas	F-199
Rysted, Karl	W-525
Sandoval, Kenneth	W-256
Sass, Heather	W-390
Saum, George	F-289
Saunders, Jack	F-47
Scar, Dick	FW-3
Scar, Dick	W-576
Scarth, Lauren	W-181
Schaaf, Amy	W-674
Schaefer, Beth	W-317
Schaefer, Dan	W-294
Schaefer, David	W-301
Schaefer, Kathleen	W-400
Schaefer, Tim	W-225
Schecter, Bruce	W-654
Schieven, Barbara	F-278
Schlatt, Job	F-192
Schlatt, Kathy	F-193
Schneiter, Carl	F-322
Scholes, Shelly	W-502
Schulke, Marilyn	F-148
Schulke, Marilyn	F-260
Schutte, Robert W	W-418
Scott, Lesley	W-283
Seailer, Barbara	W-166
Seitz, Neil	W-640
Seppi, Aldo	F-282
Seppi, Donna	F-313
Seppi, Edith	F-46
Seppi, Edith	F-321
Sessions, Lee	W-30
Sessions, Lee	W-667
Sethna, Aemin	W-174
Setline, Corby	W-509
Sexton, Rich	F-277
Shanley, Ann	F-154
Shanley, Greg & Patty	F-201
Shannon, Cornelia	W-100
Shannon, Michael	W-493
Sheets, Kenneth & Kathy	F-269
Shelly, Don	W-105
Shields, Dan	W-698
Shigley, Floyd & Hazel	F-145
Siart, Tina	W-399
Simon, Dave	F-33
Sirkis, Jon	W-524
Sisk, John	W-641
Sisk, Thomas	W-668
Skala, William	F-48
Slater, Mark	L-13
Smallwood, Tom	F-179
Smith, Donald	F-100
Smith, R. R.	F-180
Smith, Richard A	F-157
Smith, Robert Dolan	W-82
Smith, Rocky	W-684
Smith, Roy	F-251
Smith, William	F-117
Snow, Lew	F-235
Snyder, George	F-173
Snyder, Gloria	W-355
Snyder, Marilyn	W-621
Soden, Katie	W-694
Sorenson, Fred	F-213
Spangler, Robert & Sharon	W-452
Spangler, Robert & Sharon	W-453
Spezia, John	F-200
Staffel, Jon	W-367
Starrett, John	W-430
Staub, Frank	W-573
Stephens, G Arthur	W-549
Stepisnik, Mr & Mrs	F-299
Stewart, Dr Sally	W-437
Stockel, Antje	W-436
Stockel, Nanette	W-274
Storn, Brad	W-580
Strength, Gina	W-239
Sudar, Jon	W-548
Sullivan, Dan	W-679
Sullivan, Daniel	L-11
Sullivan, John B	W-92
Summerlin, Linda	W-343
Summerlin, Stephanie	W-385
Summers, W E	W-487
Summersett, Ben	F-220
Suppes, Patricia A.	W-130
Swanley, Daniel	W-593
Swanson, John	W-466
Swanson, Nancy	W-350
Swanson, Thomas	W-373
Sweeney, Brigid	W-596
Swift, Joy	F-237
Sydr, David	W-273
Tabb, Michael	W-441
Tabbert, Paige	W-352
Tahott, Laura L.	W-84
Talcott, Steve	W-123
Tanner, James	W-570
Tanner, Mark	W-567
Tate, Daniel	F-227
Teel, Jeanne P	W-221
Tessem, Michael	W-508
Thomas, Dawn	W-347
Thompson, Carol	W-486
Thompson, Don	W-461

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NON-GOVERNMENT INDIVIDUAL	ASSIGNED NUMBER
Thompson, William	W-628
Tibbetts, Jeffrey	W-142
Tiger, Hollis	W-380
Tipton, Robert	F-79
Torres, Dennis G	W-35
Tosto, Clare	W-124
Towns, Jim	W-541
Townsdin, John	F-330
Tracer, Lynne	W-587
Treadwell, Carol	W-167
Trester, Robert W.	W-29
Trippet, Natalie	W-188
Truemser, Glenn L.	W-118
Trujillo, Ermos	W-253
Trujillo, Pete	W-242
Trujillo, Roberta	W-236
Turnbull, Linda	F-246
Turnbull, Ronald	F-247
Turner, Linda	F-76
Tursick, Denise	F-224
Tursick, Timothy	F-225
Vail, Bill	W-405
Valdez, Kenny	W-252
Valentine, Ronald	F-320
Van Leuven, Kenneth & Josephine	W-604
Van Thader, Terry	W-590
Van Treese, Earl C	F-104
Vance, Jr , David C.	W-328
Vargas, April	W-248
Vasberg, Donald P.	F-111
Vaughn, Ben	F-232
Vickers, Elaine	W-550
Villaman, Corrine	W-76
Villard, Kenneth	F-82
Vincent, Susan Elsie	W-213
Wachterman, Steve	W-471
Waddington, David	W-482
Wade, John	W-620
Wagner, Arleen	W-614
Walk, Sharlene	W-251
Walker, Julia Ann	W-5
Wallace, Arthur W.	F-272
Wallace, John	W-472
Wallace, John	W-561
Wallace, John	W-562
Wallace, Margaret	F-175
Wallenborn, Andrea	W-266
Wallenborn, Julian	W-257
Wandell, Kristina	W-163
Warmak, Robert	W-361
Warren, Robert	W-690
Washer, H C.	F-85
Waters, Glen	F-218
Watkins, Linda	F-259
Watson, Ray	W-504
Waugh, Alan Albert	W-176
Weaver, Chris	W-685
Weber, Matt	W-656
Weese, Corey Lee	W-240
Weigarc, Diane C.	W-127
Weis, Paul	W-475
Welch, Richard	W-511
Welhoyt, Katherin M.	W-26
Wellaran, Margaret	F-265
Wells, Mary V.	W-287
Wells, Phil	W-546
Westerman, Richard	W-557
Whipple, Barbara	W-98
White, David W.	W-435
White, Jaye	W-496
Whitehead, James & Elena	W-139
Whitsit, Arlen D	F-150
Wicks, David	W-518
Wieder, Holly	W-330
Wiggans, Tamara	F-276
Wild, Jr , Sam H.	F-143
Wilder, Michael	F-164
Wilder, Sanford	W-302
Wilkin, D B	F-153
Williams, Constance	F-69
Williams, Jerry	F-84
Williams, John	F-211
Williams, John	W-682
Williams, Louise	W-34
Williams, Madeliene	F-249
Williams, Paul	W-189
Williams, Scott	F-250
Willimas, Louise	W-636
Willimas, Roger	W-632
Willms, Dirk & Vera	F-96
Wilson, Robert B.	W-133
Windarsk, Thomas E	F-267
Winker, Bruce K	W-78
Wlanding,	F-298
Wolf, Tom	W-526
Wood, Caroline M	W-220
Wood, Steve	W-226
Woods, Merel O	F-261
Worden, George O	F-264
Worley, Peter K	W-356
Wotipka-Gloscia, Anne	W-449
Wright, Bill	W-592
Wright, Jonathan	W-275
Wright, Karen	W-445
Wright, Theodore	W-534
Wubben, Sara	W-494
Wysocki, Maureen C.	W-15
Yeager, Mark	W-384
Young, Joe-Boh	W-80
Young, John	W-655
Youngren, Patty	F-288
Zacher, Jule A.	W-337
Zadra, Daniel	F-270
Zadra, Dennis	F-109
Zadra, Dennis M	F-248
Zadra, Gary	F-170
Zartman, Monroe	F-20
Zeigler, Glenn & Susan	W-440
Zeligman, Bernard	W-683
Zeller, Jill	W-333
Zinkl, Janice	F-263
Zorger, Linda	W-223
Zurish, David	W-346

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NON-GOVERNMENT ORGANIZATION	ASSIGNED NUMBER
American Wilderness Alliance	FW-9
Amoco Production Company	F-15
Arkansas Valley Audubon Society	F-307
Aspen Wilderness Workshop	W-530
Atlantic Richfield	F-305
Becky Ann Mining Company	F-93
Centennial Daniel Kehoe	F-41
Centennial Enterprises & Real Estate	F-40
Champlin Petroleum Company	F-25
Chevron, Inc.	F-29
Climax Molybdenum Company	F-92
Colorado Mining Association	W-455
Colorado Mountain Club	F-301
Colorado Mountain College	F-38
Colorado Open Space Council	F-8
Colorado Open Space Council	W-107
Colorado Open Space Council & Wilderness Society	FW-8
Colorado Ute	F-306
Colorado Wildlife Federation	F-343
Conoco, Inc.	F-16
Conquistador Ski Area	F-255
Continental Divide Trail Society, James Wolf	F-70
Custer County Stockgrowers	W-50
Denver Audubon Society	F-257
Denver Audubon Society	W-608
High Country Drifters, Richard Garlock	F-223
Huerfano Valley Citizens' Alliance	W-597
Jeepers Creepers, P. Patrick Turner	F-71
KKBNA Inc., Consultant Engineers	F-163
Lake County Soil Conservation District	F-35
Leadville Chamber of Commerce	F-335
Lions Club - Leadville	F-23
Magna Associates, Jeff White	W-45
Minerals Exploration Coalition	W-601
National Audubon Society	F-258
National Wildlife Federation	F-303
Natural Resources Defense Council	F-338
Noranda	W-598
Package of Letters to Dennis O'Neill	F-239
Rocky Mountain Oil & Gas Association, Inc.	F-7
Sangre de Cristo Resource Conservation & Devel. Area Project Council	F-183
Sierra Club	FW-7
SOHIO Petroleum Company	F-215
Super 8 Lodge	F-42
The Partnership, Chaffee County	F-65
U.S. Mining International	F-110
Upper Arkansas Water Conservancy District	L-9
Wexpro Company	F-10
Wildlife Management Institute	F-155
Wright Engineering	W-43

Table VI-4 continued

GOVERNMENT AGENCIES/OFFICIALS	ASSIGNED NUMBER
Chaffee County Commissioners	F-26
City of Colorado Springs	F-302
Colorado Department of Health (Air Pollution)	L-8
Colorado Department of Highways	L-7
Colorado Department of Natural Resources	L-3
Colorado Division of Commerce & Development	F-37
Colorado Division of Parks & Outdoor Recreation	F-342
Colorado Division of Wildlife	L-2
Colorado Historical Society	L-5
Colorado Historical Society	L-6
Colorado Natural Areas Program	L-1
Colorado State Engineers	L-4
Corps of Engineers, Army	F-2
Custer County Planning Commission	F-140
Kansas Fish & Game	F-256
Kansas Park and Resources Authority	F-256
Lake County Assessor	F-6
Lake County Commissioners	F-286
Lake County Planning Commission	F-285
Lake County Soil Conservation District	F-35
Pikes Peak Area Council of Governments	F-304
Pitkin County Commissioners	W-469
Town of Fairplay	F-340
U.S. Department of Housing & Urban Development	F-5
Upper Arkansas Area Council of Governments	F-22
Upper Arkansas Water Conservancy District	L-9
USDA, Office of the Secretary, Minority Affairs	F-221
USDA, Soil Conservation Service	F-95
USDI, Bureau of Indian Affairs	W-102
USDI, Geological Survey	W-44
USDI, Office of Surface Mining	F-4
USDI, Office of the Secretary, Office of Environmental Review	F-102

Table VI-4 continued

PETITIONS	ASSIGNED NUMBER
Bernhardt Petition w/13 names	W-527
Bradbury petition w/4 names	F-168
Concerned Citizens for Spanish Peaks Petition w/26 names	W-547
Hulsey petition w/3 names	F-138
James Potter petition w/30 names	F-284
Petition w/12 names	W-200
Petition w/14 names	F-287
Petition w/15 names	F-296
Petition w/17 names	F-178
Petition w/17 names	W-46
Petition w/22 names	F-53
Petition w/29 names	F-202
Petition w/41 names	W-33
Petition w/5 names	F-279
Petition w/51 names	F-329
Petition w/600 names	F-323
Petition w/8 names	F-204
Petition w/815 names	F-238
Roger D. Bonewell Petition w/18 names	F-131
Varner Associates - Petition w/29 names	F-57

Table VI-5 PUBLIC COMMENTS ON THE DRAFT EIS AND FOREST SERVICE RESPONSE

The assigned number is made up of two parts. The letter represents what the person is responding to (i.e. F-Forest Plan, W-Wilderness Study Area (WSA) Reports, FW-Plan and WSA Reports), the number that follows is the sequential order of letters, petitions, etc. received. The name following the assigned number identifies the commentor. The number and letter that follows identifies the section and Forest Service response (i.e. 23a means Section 23, comment a; 23a can be found on Page VI-74).

Assigned Number	Individuals & Organizations Responding to Plan and DEIS and Comment Number
F-1	Rev. O. J. Mooney III-23a
F-7	Rocky Mountain Oil & Gas Association, Inc.-6h,20n
F-8	Colorado Open Space Council-(See W-107, same letter)
F-9	A.L. Davis-20m,21k
F-10	Wexpro Company-3u
F-11	Jessie King-6l
F-12	Lorraine Lane-7b,14r
F-13	H.L. Hill-23a
F-14	Mrs. Frances C. Carter-1h,4a,5b,7f,9o,9www,10k,10n,11e, 12ff,14b,14s,14p,15s,16c,17g,18c,19b,20g
F-15	Amoco Production Company-6a,6b,6c,6d,6e,6f,6g,6i,6r
F-16	Conoco, Inc.-6a,6b,6c,6d,6e,6f,6h,6i
F-17	Mrs. Scott Abbott-20g
F-18	Kirk Cunningham-7j,15b,15s,19a,20m
F-19	Nell Maier-23a
F-20	Monroe Zartman-23a
F-21	Elizabeth Geer-20g
F-23	Lions Club - Leadville-23a
F-24	Betty Jane Maass-23a
F-25	Champlin Petroleum Company-6a,6h,6i
F-27	Gertrud Nuhn-7a
F-28	Walter J. Maass-1g,3o,20m,21k,23a
F-29	Chevron-6i
F-30	William Coates-6r,7j,9n,20n
F-32	David Lucas-20g
F-33	Dave Simon-20g
F-34	Marie Chisholm-10d
F-36	Ron & Pam Cochran-23a
F-38	Colorado Mountain College-23a
F-39	John Cirullo-23a
F-40	Centennial Enterprises & Real Estate-23a
F-41	Centennial Daniel Kehoe-23a
F-42	Super 8 Lodge-9cc,23a
F-43	Reva O'Neill-23a
F-44	Frank Luoma-23a

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F-45	Lester Ross-23a
F-46	Edith Seppı-23a
F-47	Jack Saunders-23a
F-48	Willıam Skala-23a
F-49	Larry Andersen-23a
F-50	Merılee O'Neal-23a
F-51	Paul Gnadt-23a
F-52	Robert Civıl-23a
F-53	Letter w/22 names-23a
F-54	Carrıe Bry-23a
F-55	Carmen Bryce-9w
F-56	Otelıa Hovland-23a
F-57	Varner Associates w/petition w/29 names-23a,25a
F-58	Erıc Lundgren-20g
F-59	Lorı Roney-20k
F-60	Hugh Kıngery-15c,15s,17g,18c,18n
F-61	Walter Maass-23a
F-62	Marguerite Blanke-No Response Requıred
F-63	Jeanne T. Hemphıll-20m
F-64	Ronald J. Meardon-15s,17g,17h,18c
F-65	The Partnershıp, Chaffee County-20r
F-66	Dennıs Harvey-7a,7g,9p,9lll,20r
F-67	D. Lında Olson-7a,7g
F-68	Teresa Irvıne-7g,9p,10f,20s
F-69	Constance Willıams-23a
F-70	James Wolf - Contınental Dıvide Traıl Socıety-7h
F-71	R. Patrıck Turner - Jeepers Creepers-7g
F-72	Hugh Myer-7g
F-73	Kurt Ellıs-7a,7c,10e,10f
F-74	Rıta Ellıs-7g,20s,21a
F-75	Bernard Pacheco-2g
F-76	Linda Turner-7g
F-77	Linda Olson-10e,10f
F-78	No Name-7g,10d
F-79	Robert Tipton-3r,7g,20s
F-80	Larry John-7g
F-81	Gene Nelson-7g
F-82	Kenneth Vıllard-7g
F-83	Doris Nelson-7g,10d
F-84	Jerry Wılliams-7g,10e,13a
F-85	H.C. Washer-7g
F-86	Patrıcıa Graham-20s
F-87	Daniel Olson-7g
F-88	Dale Kırk-7g
F-90	Mary John-7g
F-91	Jım Pagel-25a
F-92	Clımax Molybdenum Company-23a
F-93	Becky Ann Mınıng Company, Shelly Walker-23a
F-94	Dennis Bunger-7j,7k
F-96	Dırk & Vera Wıllms-23a

Table VI-5 Continued

F-97	Josette Pagel-23a
F-98	Jack Cornell-23a
F-99	Peter Romeyn-14p
F-100	Donald Smith-23a
F-101	Toby Atencio-23a
F-103	Vernon Brinkley-23a
F-104	Earl C. Van Treese-15e
F-105	Brant A. Bradford-23a
F-106	Mary Martin-23a
F-107	James Davidson-12kk,12xx,23a
F-108	John Pagel-23a
F-109	Dennis Zadra-1g,3w,3jj,11n,12vv,12aaa,12bbb,12ddd,18c,23a
F-110	U.S. Mining International, Vincent Macaluso-20n,23a
F-111	Donald P Vasberg-23a
F-112	W.H. Brunger-7j,22c
F-113	Kay A. Brook-7g
F-114	Stewart H. Fonda, Jr.-23a
F-115	Earl Hockett-23a
F-116	Thomas J. Dries-23a
F-117	William Smith-23a
F-118	Donald Meek-23a
F-119	Bud D. Bottcher-7g
F-120	Jeff Landsbach-2i,7a,10e,14e,20s,21a
F-121	Lisa Campbell-23a
F-122	Larry Burdick-23a
F-123	Daryl Anderst-1h,7a,911
F-124	J. Cleres-2i,7a,10e,14e,20s,21a
F-125	John Masterson-23a
F-126	R. W Casey-1a,2h,3r,9i,9t,10b,10c,11p,22a
F-127	Karen S Puhl-23a
F-128	Dale Habighorst-23a
F-129	Kenneth Killerman-23a
F-130	Alfred Habighorst-23a
F-131	Roger D. Bonewell w/18 names-23a
F-132	Robert Mason-9i,23a
F-133	Steven R Lane-9o,11j,12hh
F-134	Morris E. Meese-23a
F-135	Charles V. Ley-23a
F-136	Henry Masterson-1a,9c,9h,9i,9o,10a,11a,18c,23a
F-137	Lee W. Hockett-23a
F-138	Hulsey, w/3 names-23a
F-139	Clay Hauser-23a
F-141	C John Novosel-23a
F-142	Jim G. Johnson-9i
F-143	Sam H. Wild, Jr.-23a
F-144	Mindy Morrow-23a
F-145	Floyd & Hazel Shigley-23a
F-146	George Lynds-7g,20r,20s,21a
F-147	John Maestrelli-23a
F-148	Marilyn Schulke-12ff,23a

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F-149	J. Childress-23a
F-150	Arlen D. Whitsit-7g
F-151	Tim McNeil-23a
F-152	Walter R. Gutierrez-23a
F-153	D.B. Wilkin-23a
F-154	Ann Shanley-9s,14o
F-155	Wildlife Management Institute-5a,5i,5l,5m,5o,7j,9b, 9zz,10g,12d,12e,12f,12g,12ff,12oo,12gg,12uu
F-156	Eugene & Mary Ross-23a
F-157	Richard A. Smith-23a
F-158	Debbie Barber-23a
F-159	Don Gamble-23a
F-160	Peter Cosgriff-9i
F-161	Corinne Diemer-23a
F-162	Hershell & Margaret Ross-23a
F-163	KKBNA Inc. (Consultant Engineers)-2g
F-164	Michael Wilder-20g,23a
F-165	Paula Linn-23a
F-166	Jim Barber-10j,23a
F-167	Jim Mykleby-23a
F-168	Bradburys w/4 names-23a
F-169	Alfredo Lopez-23a
F-170	Gary Zadra-1b,1g,2f,3vv,18l,23a
F-171	B. Stanley Goss-23a
F-172	James Atwood-23a
F-173	George Snyder-23a
F-174	Curtis Johnson-9c,9f,9i,9o,23a
F-175	Margaret Wallace-6f
F-176	Mr. & Mrs. Robert Nye-23a
F-177	Tim Johnson-23a
F-178	Petition w/17 names-9i
F-179	Tom Smallwood-23a
F-180	R.R. Smith-23a
F-181	Bernard D. McElhattan-23a
F-182	Russell S. Malsi-23a
F-183	Sangre de Cristo RC&D Project Council-3ww
F-184	James Campbell-9i,9w,14f,23a
F-185	Douglas Freund-23a
F-186	William Deisham-23a
F-187	John Habecker-23a
F-188	Maureen Hoban-23a
F-189	Charles Bost-23a
F-190	Aline Rankin-7g
F-191	Sally Crum-23a
F-192	Job Schlatt-2i,7a,10e,14e,20s,21a
F-193	Kathy Schlatt-2i,7a,10e,14e,20s,21a
F-194	Kenneth Olsen-23a
F-195	Kenneth Olsen-23a
F-196	Raimon Cook-23a
F-197	Dave Powell-8f,8g,8h,8i,12ll

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F-198	Michael Ley-23a
F-199	Thomas Rutledge-23a
F-200	John Spezia-23a
F-201	Greg & Patty Shanley-9o,11g,18c,19e
F-202	Petition w/29 names-23a
F-203	James Green-23a
F-204	Petition w/8 names-9i
F-205	Bruce M. Loeffler-No Response Necessary
F-206	Janet L. Green-23a
F-207	Sara Jane Light-No Response Necessary
F-208	Allen & Connie Long-12aa,23a
F-209	R.A. de Steiguer-23a
F-210	Charles J. Bottineau-23a
F-211	John Williams-2o,3oo,20m
F-212	Rosemarie Kulyan-23a
F-213	Fred Sorenson-2i,7a,10e,14e,20s,21a
F-214	Hans Krimm-2m,10a,18c,20g
F-215	SOHIO Petroleum Company-6a,6c,6f,6g,6h,6i,6r
F-216	Patti Brunger-7j
F-217	Arnold Kirkegaard-7a
F-218	Glen Waters-w/60 signatures-23a
F-219	Don Longstreath-23a
F-220	Ben Summersett-23a
F-222	Steven Gilette-9t
F-223	Richard Garlock, High Country Drifters-7g,10a
F-224	Denise Tursick-10o
F-225	Timothy Tursick-10o
F-226	Matt Moses-10o
F-227	Daniel Tate-23a
F-228	Mary A. Freville-23a
F-229	Augie Freville-23a
F-230	Thomas & Carol Meyer-23a
F-231	Evalyn V. Moses-7j
F-232	Ben Vaughn-9h,9i,9p,24a
F-233	William DeHerrera-23a
F-234	Donald MacDonald-1h,2j,2n,9h,9zz,9jjj,11f,23a,24a
F-235	Lew Snow-6f
F-236	W.C. McLendon-23a
F-237	Joy Swift-No Response Required
F-238	Petition w/815 names-F-238
F-239	Package of letters to Dennis O'Neill-23a
F-240	Mike Conlin-11y,23a
F-241	Alfred James III-11c,11f
F-242	Peter Molley-3r,9h,9i,10l,23a,24a
F-243	Deborah Kalivoeda-7g
F-244	Harley E. Kooker-23a
F-245	Beverly D. Kooker-23a
F-246	Linda J. Turnbull-23a
F-247	Ronald Turnbull-23a
F-248	Dennis M. Zadra-1g,7j,9w,9y,10b,10c,23a

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F-249	Madeliene Williams-7g
F-250	Scott Williams-7g
F-251	Roy Smith-7g,20r
F-252	Walter Hotchkiss-11r
F-253	Richard J. Christmas-9u,23a
F-254	William C. Frank-9i
F-255	Dick Milstein-7e
F-257	Denver Audubon Society-3e,3f,3h,3kk,5f,5g,5h,5i,5j,5k, 5l,5m,6s,8a,8b,8c,8d,9d,9o,9vv,12i,12s,12t,12w,12x, 12cc,12dd,12ee,12mm,12nn,12eee,20n
F-258	National Audubon Society-2c,2d,2k,2r,2s,2t,3q,3w,3kk, 3nn,5b,6l,9o,9t,9x,9z,9bb,9tt,9hhh,9qqq,9xxx,11n,11x, 12h,12j,12o,12s,12t,12w,12x,12ff,12hh,12mm,12nn,15s, 16f,17e,17g,18j,19a,19b,20b,20e,20m,20n,23a
F-259	Linda Watkins-1g,2l,10g,22b
F-260	Marilyn Schulke-11o,11w,12hh,12ii
F-261	Merel O. Woods-3z,7d,21f
F-262	Anthony A. Hren-9i,9u,9cc
F-263	Janice Zinkl-20m
F-264	George O. Worden-5b,9a
F-265	Magare Wellaran-23a
F-266	John Cevaal-3w,3p,22c
F-267	Thomas E. Windarsk-23a
F-268	Eleanor C. Foley-3w,3y,7b,11m,13a,20n
F-269	Kenneth and Kathy Sheets-1g,11h,12vv,12ww,12zz,12aaa
F-270	Daniel M. Zadra-23a
F-271	Dedrie S. Craig-23a
F-272	Arthur W. Wallace-14q
F-273	K.D. Dobson-9i
F-274	Christi Guidici-9g,9w,9fff,9jjj,18c,18j,18o
F-275	Beth Miller-2g,23a
F-276	Tamara Wiggans-23a
F-277	Rich Sexton-9i,9w,9ttt
F-278	Barbara Schieven-9d,9f,9h,9k,9y,9ddd,24a
F-279	Copper Petition w/5 names-7a,9a,9h,9i,9xxx,23a,24a
F-280	Pat Kithemny-9i,9t,9gg
F-281	Robert Lyall-9h,9w,9ccc,9kkk,24a
F-282	Aldo Seppi-3ll,9i,9w,9fff
F-283	Dana Braatz-1b,1h,7c,10b,10c
F-284	James Potter petition w/30 names-23a
F-287	Petition w/14 names-23a
F-288	Patty Youngren-23a
F-289	George Saum-1a,7a,11l,20n,23a
F-290	Dr. & Mrs. Wendell Ball-7j
F-291	Lorraine Fritz-9i
F-292	Russell & Anne Moyer-1g,9i,9zz,11q
F-293	Sara Christine Law-23a
F-294	Bruce Diamond-23a
F-295	Debbie Diamond-23a
F-296	Petition w/15 names-23a
F-297	Wade Ruble-9h,9i,9u,9iii,11q,23a

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F-298	Wlandıng-23a
F-299	Mr. & Mrs. Stepısnık-23a
F-300	Brıan Collıns-23a
F-301	Anne Vıckery, Colorado Mountaın Club-1e,1f,3g,3r,3aa,3cc, 3dd,3nn,6j,6k,7a,9j,9t,9cc,9zz,9qqq,10a,11p,15s,16f,17f, 18n,19a,20g,21c,21d,21e
F-303	Natıonal Wıldlıfe Federatıon-6n,9mmm,9oo,9pp,9qq,9rr,9ss, 12a,12b,12c,12j,12k,12n,12o,12s,12t,12u,12v,12x,12bb,1200, 12pp,12qq,12ss,12vv,12ccc,12eee,22a
F-305	Atlantıc Rıchfıeld-6a,6b,6c,6d,6e,6f,6g,6h,6ı,6v,15f
F-306	Colorado Ute-14g,14j
F-307	Arkansas Valley Audubon Socıety-1d,3bb,9z,9nn,9ww,10b,10c, 12ıı,12mm,20b,20j,20n,22a,22b
F-308	Gerald Davıs-3a,3b,9m,9v,9jj,9ttt,10d,10e,14a,14b,14d,20g
F-309	Donna Porter-9ı
F-310	Mr. & Mrs. Iliff & Geraldıne Haulman-9ı
F-311	Lonnıe D. Goodwin-9ı,9cc,22b,23a
F-312	Elgin Rusch-1g,11o,12r,12aaa,23a
F-313	Donald Seppı-9c,91,9cc,23a
F-314	Lisa Hinderlıder-23a
F-315	Dan Mıller-7a,10b,20r
F-316	Kay Lınder-23a
F-317	Donald Meek-23a
F-318	Jım Ellewberger-23a
F-319	Mıchael Lay-9ı
F-320	Ronald Valentıne-23a
F-321	Edıth Seppı-4b,9h,9k,9vvv,11v,12q,24a
F-322	Carl Schneiter-9ı
F-323	Petıtıon w/600 names-23a
F-324	Jean McCoy-9t,9zz,9jjj,11j
F-325	N.E. Harvey-9ı,9cc,10c
F-326	Merılee O'Neal-9ı
F-327	Donald Hox-311
F-328	Wıllis & Sharon Beach-9ı,9zz,9sss,23a
F-329	Petıtıon w/51 names-9ı
F-330	John Townsdın-9a,23a
F-331	Glenda Dunn-9t,9cc,11r
F-332	John Allen Moore-9t
F-333	Stephen & Shirley Campbell-9v
F-334	Harold Neufeld-23a
F-335	Leadvılle Chamber of Commerce-9w,9y
F-336	Henry Florschutz-9t
F-337	Mr. & Mrs. Carle-23a
F-338	Natural Resources Defense Council-2a,2b,5e,9kk,9uu,9vv, 9mmm,9nnn,9ooo,9ppp,9rrr,10a,11k,11q,12eee,22a,3d
F-339	R.W. Cool-3r
F-341	Marsha Carter-23a
F-343	Colorado Wıldlıfe Federatıon-3qq,3rr,3ss,3tt,3uu,5n, 9bbb,11ı,11t,11u,12g,12x,12gg,12mm,12eee,14c,14h,14ı, 14k,14n,18b,18p,22b

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Assigned Number	Individuals & Organizations Responding to Plan & WSA Reports and Comment Number
FW-1	Theodore A.W. Moore-7k,9zz,11f,15i,15s,16f,20n
FW-2	Marilyn Hackett-9t,17g,18c
FW-3	Dick Scar-1d,3r,9o,18b,18c,20n,23a
FW-4	H.R. Montgomery-20s,23a
FW-5	Roger Fuehrer-7a,7b,15i,20n
FW-6	John Anderson-5e,7d,7i,9z,9qqq,11p,12l,12m,12s,12w, 12x,12qqq,15q,20m
FW-7	John Stansfield, Sierra Club (CS)-1c,2p,2q,3r,3kk,3nn, 9v,9ll,9xx,9ggg,9nnn,12y,16a,16f,17a,17f,17g,18c,18f, 18l,20g,20n
FW-8	Colorado Open Space Council & Wilderness Society-1e,1g,1h, 1i,3i,3j,3k,3m,3n,3t,3ee,3kk,6a,6m,6n,6o,7a,7d,9ff,9hh, 9ii,9zz,10g,10h,11a,11b,11g,12ggg,15c,15g,15i,15q,15s,15u, 16b,16e,16f,17a,17b,17c,17d,17f,17g,17h,17j,18c,18d,18g, 18h,18k,18n,20f,20n
FW-9	American Wilderness Alliance-18c,18l,18q,19b

Assigned Number	Individuals & Organizations Responding to Plan With Wilderness Emphasis and Comment Number
W-1	Toni Evins-20g
W-2	Marilyn Kiarsis-Starrett-20m,20n
W-3	Kerry Sue Byers-20m,20n
W-4	Tom Egan-21k
W-5	Julia Ann Walker-9ccc,20m,20n
W-6	Ann Chafee-9eee,15s,20m,20n,21k
W-7	Barbara F. Bedinger-20n
W-8	Margaret Burgess-15s,17g,17h,18c
W-9	Elsa Berner-15s
W-10	Margi Durrum-15i
W-11	Evelyn S. Keith-15i,20n
W-12	Robert D. Antiel-15i
W-13	L. Randolph-15i,15m
W-14	Kenneth J. Gamauf-15s,20n
W-15	Maureen C. Wysocki-20m
W-16	Steve Andrews-15s,17g,18c,20m,21k
W-17	Susie Evans-No Response Required
W-18	David & Annie Mazel-15i
W-19	Lorraine Lane-15b,15s
W-20	Bruce Batting-17a
W-21	Robert F. Naatz-15s
W-22	Barbara A. Dell-7k,15i,15s
W-23	T. Hubert Archuleta-9r
W-24	Rose W. Lamb-9r
W-25	Joyce H. Lamb-6t

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W-26	Katherın M. Welhoyt-20m
W-27	Walter C. Downıng-15s,18c,20m,20n
W-28	John B. Loomıs-3k,3m,3dd,20t
W-29	Robert W. Trester-15s,20g,20m,20n
W-30	Lee Sessıons-16f,17g,19a,20g,20m,20n
W-31	Barbara Dell-19b,19d,19e,20n
W-32	Kırk Dornbush-17g
W-33	Petıtion w/41 names-17a
W-34	Lousıe Wılliams-20n
W-35	Dennıs G. Torres-20h
W-36	Steve Bors-15q,15s,20n
W-37	Vicki Engler-15ı,15s
W-38	Don Rıchmond-15h,15s
W-39	Jan Meadows-20h
W-40	Thomas G. Rampton-20g,20n
W-41	James L. Daly-15g,17g,20m
W-42	Lında Kenagy-3bb,18c,20m,20n
W-43	Wrıght Engıneerıng-No Response Required
W-45	Jeff Whıte - Magna Associates-15e
W-46	Petıtıon w/17 names-20m,20n
W-47	Carl Henrıkson-20n
W-48	Glenn H. Badney-9www,15i
W-49	Peter W. Krag-6r,20p
W-50	Custer County Stockgrowers-4c,20e,20r
W-51	Elizabeth C. Bosley-15s,19b
W-52	Liz Jones-15ı,20g
W-53	Don Engelhardt-20n
W-54	Thomas Penzel-20m
W-55	Tudor & Pamela Marks-15s
W-56	Leland R. Edelmaier-15s,20g,20m
W-57	Gernot Heınrichsdorff-3nn,15ı,17g,18c,20g
W-58	Mark E. Dixon-17g,18c,20g
W-59	Albert J. Nıznık, Jr.-15s
W-60	Jackie R. Pullın-17g
W-61	Lyle Nissen-15e,15s
W-62	Keith Cliver-15i,15s
W-63	Thomas A. Pyle-15s,20m,20n
W-64	Nick Fluehr-20m,20n
W-65	Laurie Bartaczewiz-20m,20n
W-66	Susan Holt-20m,20n
W-67	Ruth Paulsen-20m,20n
W-68	Art Kestler-20m,20n
W-69	Cheri Juergens-20m,20n
W-70	Mr. & Mrs. Donald Martin-20m,20n
W-71	Jean Hediger-20m,20n
W-72	Chris Honıcky-20m,20n
W-73	Bıll Nedell-20m,20n
W-74	David Garrıson-20m,20n
W-75	Marian L. Beacham-20m,20n
W-76	Corrıne Villaman-20m,20n
W-77	Sally Husak-20m,20n

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W-78	Bruce K. Winker-20h
W-79	Steve Clough-20m,20n
W-80	Joe-Boh Young-20m,20n
W-81	Jonathan L. Richardson-20m,20n
W-82	Robert Dolan Smith-20m,20n
W-83	Jennifer W. Reeves-20m,20n
W-84	Laura L. Tahott-20m,20n
W-85	John D. Elnore-20m,20n
W-86	James Ligner-15s,20n
W-87	Amy L. McCoy-20n
W-88	Mrs. Hertha P. Lane-15s,20m,20n
W-89	Alice T. Goodlette-20m
W-90	George E. McKinnon-1h,7b
W-91	Chris Citron-20m,20n
W-92	John B. Sullivan-20m
W-93	Dennis Creamer-15s,20g
W-94	Beth V. Carlsen-15i,15s
W-95	Steve Friedman-20g,20n
W-96	Carol A. Berkenbaugh-16f,17g,17h,18c,20n
W-97	Nina L. Johnson-15s,17a,17h,18c,20g,20m
W-98	Barbara Whipple-15s,18c,20g
W-99	Deborah Hayes-15s,20m,20n
W-100	Cornelia Shannon-20l,20m,20n
W-101	Nancy Brinza-20n
W-102	Robert Bendetti-15s,20n
W-103	Scott L. Mercy-15s,20g
W-104	Kathy & Ruth Hallahan-20m,20n
W-105	Don Shelley-20m,20n
W-106	Mary Heinle-Jacobs-20n,21b
W-107	Colorado Open Space Council-5a,5b,5c,5f,6i,6s,6w,7a,7c, 7e,7j,8e,8h,9e,91,9x,9z,9aa,9dd,9ee,9aaa,9uuu,10a,10i, 11d,11f,11k,11s,12a,12p,12q,12r,12s,12t,12w,12x,12z, 12gg,12hh,12ii,12jj,12ll,12mm,12nn,12qq,12rr,12ss,12tt, 12uu,12xx,12yy,20a,20l,20m,20n,21b,21f,21g,21h,21k
W-108	Mr. & Mrs. Thomas Ross-15s,20j,20m
W-109	James L. Busey-17g
W-110	Diana Hewark-15s,20g,20m
W-111	Reed & Karen Dils-15s,16f,17g,17h,18c
W-112	Viola P. Meokins-20m,20n
W-113	Randy K. Reigle-20h
W-114	Ann Melville-20m,20n
W-115	Genevieve Reitherman-20m,20n
W-116	Ruth Lacy-20n
W-117	Janet Johnson-20m,20n
W-118	Glenn L. Truemser-20m,20n
W-119	Krista Nicholl-20m,20n
W-120	Linda Johnson-20m,20n
W-121	Christina Dunn-20m,20n
W-122	Suzanne E. Bourcier-20m,20n
W-123	Steve Talcott-20m,20n
W-124	Clare Tosto-20m,20n

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W-125	Holly Gatehouse-20m,20n
W-126	Robert Rohrer-20m,20n
W-127	Thane C. Weigard-20m,20n
W-128	Jennifer E. Ball-20m,20n
W-129	Bruce Harris-20m,20n
W-130	Patricia A. Suppes-20m,20n
W-131	Richard J. Ambler, Jr.-20m,20n
W-132	Timothy A. Johnson-20m,20n
W-133	Robert B. Wilson-20m,20n
W-134	Pam Ritchie-20m,20n
W-135	Patricia L. Lapish-20m,20n
W-136	Leslie Elliott-20m,20n
W-137	John Boyman-20m,20n
W-138	Heather M. Ehmke-20m,20n
W-139	James & Elena Whitehead-20m,20n
W-140	Jeffery Clark-20m,20n
W-141	Steve Brodbeck-20m,20n
W-142	Jeffrey Tibbetts-15s,18c,20m,20n
W-143	April Austin-20m,20n
W-144	Margaret E. Buzzell-20m,20n
W-145	Seort Clark-29m,20n
W-146	Kari Pearson-20m,20n
W-147	Judi Remilland-20m,20n
W-148	Ann Lien-20m,20n
W-149	Muhng Iren-20m,20n
W-150	Leigh Ann Lindsay-20m,20n
W-151	Linda M. Miller-20m,20n
W-152	Sandra Mary-20m,20n
W-153	Janine Remillard-20m,20n
W-154	Timothy Flint-20m,20n
W-155	Sakeina Dowess-20m,20n
W-156	Kristi L. Lovelady-20m,20n
W-157	Chris Boone-20m,20n
W-158	Sandy Redfern-20m,20n
W-159	Leslie Eddington-20m,20n
W-160	Wendy Freeman-20m,20n
W-161	Gary Fleen-20m,20n
W-162	Robert Redfern-20m,20n
W-163	Kristina Wandell-20m,20n
W-164	Clinton Hatton-20m,20n
W-165	Kim Ross-20m,20n
W-166	Barbara Sealler-20m,20n
W-167	Carol Treadwell-20m,20n
W-168	Michelle Ritter-20m,20n
W-169	Suzanne Block-20m,20n
W-170	Stacey Hansen-20m,20n
W-171	Daniel Hanna-20m,20n
W-172	David Kurtz-20m,20n
W-173	Flicia Cabrera-20m,20n
W-174	Aemin Sethna-20m,20n
W-175	Janet Hedgepeth-20m,20n

Table VI-5 Continued

W-176	Alan Albert Waugh-20m,20n
W-177	Sam Landes-20m,20n
W-178	Christie J. Cooper-20m,20n
W-179	Lisa Redfern-20m,20n
W-180	Merritt Henley-20m,20n
W-181	Lauren Scarth-20m,20n
W-182	Polly Miner-20m,20n
W-183	Janet Kilk-20m,20n
W-184	Patty Mulford-20m,20n
W-185	Marcia McHain-20m,20n
W-186	Celia Block-20m,20n
W-187	Dunkar Oehming, Jr.-20m,20n
W-188	Natalie Trippet-20m,20n
W-189	Paul Williams-20m,20n
W-190	Diane J. Moolenaar-20m,20n
W-191	Claire Moolenaar-20m,20n
W-192	Peter Marshutz-20m,20n
W-193	James L. Heatwole, Jr.-20m,20n
W-194	Jacob Kreycik-20m,20n
W-195	Ira J. Kowal-9www,17g,17h,19a,19b,20n
W-196	Diane J. Matheny-20g
W-197	Laura Reitherman-20m,20n
W-198	Bonnie Bubendorf-15s,20g,20m,20n
W-199	Mr. & Mrs. John Brownsword-20m,20n
W-200	Petition w/12 names-15s,20m,20n
W-201	Bonniesue Rohrer-20m,20n
W-202	Susie Mason-15e,17i
W-203	Susie Mason-18e
W-205	Susie Mason-15e,17g
W-206	Craig Lindley-7k,9cc,15s,16d,20g,20m,20n
W-207	John Means-15i,15s,17g,20m,20n,21j,21k
W-208	Keith & Lisa Bol-15s,20m,20n,21b
W-209	Thomas & Elizabeth Pohl-20m,20n
W-210	Christopher Martin-15i,15s,20n
W-211	Jaggie Lamplighter-15s,20m,21n,21k
W-212	Nancy Lawrence-20m,20n
W-213	Susan Elsie Vincent-20m,20n
W-214	J. David Grown, Jr.-20m,20n
W-215	Robert Andrews-20m,20n
W-216	Gretchen Batz-20m,20n
W-217	Denise Anderson-20m,20n
W-218	Leslie Barrett-20m,20n
W-219	Thomas Cundiff-20m,20n
W-220	Caroline M. Wood-20m,20n
W-221	Jeanne P. Teel-20m,20n
W-222	Dr. Joyce C. Cundiff-20m,20n
W-223	Linda Zorger-20m,20n
W-224	Suzanne Remillard-20m,20n
W-225	Tim Schaefer-15g,20m,20n
W-226	Steve Wood-12ff,15q,15s
W-227	Louise Conner-15g,15s,20g,20n

Table VI-5 Continued

W-228	Alvin Edlund, Jr.-21e,21j
W-229	Electra Fowler-20n
W-230	Chandler MacIndoe-20n
W-231	Jana Kayo-2e
W-232	Chris Gomez-20c
W-233	Kristin Heinonew-9o
W-234	Jason-20c
W-235	Gerald Martinez-16f
W-236	Roberta Trujillo-20g
W-237	Brandon Archuleta-16f
W-238	Lisa Aguirre-16f
W-239	Gina Strength-16f
W-240	Corey Lee Weese-17f
W-241	Jennifer Dimond-16f
W-242	Pete Trujillo-20c
W-243	Eric Quintana-16f
W-244	Montana Baldwin-20c,20g
W-245	Silva Beach-20g
W-246	Alan Martinez-20g
W-247	Dolores Cisneros-20c
W-248	April Vargas-20d
W-249	Denise Abila-20g
W-250	Mavis Baker-20m
W-251	Sharlene Walk-20n
W-252	Kenny Valdez-20c
W-253	Ermos Trujillo-20d
W-254	Nicky Carter-20m,20n
W-255	Evan Grace-20n
W-256	Kenneth Sandoval-3xx,20d
W-257	Julian Wallenborn-16f
W-258	John Campbell-20c
W-259	Sarah Carter-20g,20n
W-260	No Name-20c
W-261	Juniper Bartlett-16f
W-262	Sara D'Ambrosia-20g
W-263	Rebecca Cisneros-20c
W-264	Robin Martinez-16f
W-265	Tansy Coury-16f,17d
W-266	Andrea Wallenborn-20g
W-267	Mark Peters-20n
W-268	Linda Passey-20m,20n
W-269	Joe Hardman-20m,20n
W-270	Connie Eldridge-20m,20n
W-271	Jo Ellen Borrow-20m,20n
W-272	George Harper-20m,20n
W-273	David Sydr-20m,20n
W-274	Nanette Stockel-20m,20n
W-275	Jonathan Wright-20m,20n
W-276	Christie Francis-20m,20n
W-277	Dan Carnesciale-20m,20n

Table VI-5 Continued

W-278	Julie Hall-20m,20n
W-279	Katherine Orn-20m,20n
W-280	Kathi McCoy-20m,20n
W-281	Keith Davison-20m,20n
W-282	Stacy L Forst-19b,20m,20n
W-283	Lesley Scott-20m,20n
W-284	Pamela Bickford-20m,20n
W-285	Fred Felschow-20m,20n
W-286	Brenda Augensen-20m,20n
W-287	Mary V Wells-20m,20n
W-288	Robert C. Charlton, Jr.-20m,20n
W-289	Alden Bullwinkle-20m,20n
W-290	Glenn Grow-20m,20n
W-291	Suzanne Barton-20m,20n
W-292	Stephen Riffert-20m,20n
W-293	David Riffert-20m,20n
W-294	Dan Schaefer-20m,20n
W-295	Charles Barnes Abbott-20m,20n
W-296	Tracy Farrell-20m,20n
W-297	Eric Meyers-20m,20n
W-298	David L. Bean-20m,20n
W-299	Bill Hawkins-20m,20n
W-300	Heidi A. Dittman-20m,20n
W-301	David Schaefer-20m,20n
W-302	Sanford Wilder-20m,20n
W-303	Tish Hopkins-20m,20n
W-304	Eileen Becknese-20m,20n
W-305	Elaine Follies-20m,20n
W-306	Paul Krause IV-20m,20n
W-307	Joy Brusberg-20c,20m,20n
W-308	Roger Batz-20m,20n
W-309	Dale Cummings-20m,20n
W-310	Judith Felch-20m,20n
W-311	June Dickinson-20m,20n
W-312	Doug Dickinson-20m,20n
W-313	Georgie Ives-20m,20n
W-314	Melanie Clark-20m,20n
W-315	Reinhart Ross-20m,20n
W-316	Kristine Kranz-20m,20n
W-317	Beth Schaefer-20m,20n
W-318	Eli Barringer-20m,20n
W-319	Percy Anne Buchanan-20m,20n
W-320	Wendy Dunbar-20m,20n
W-321	Thomas Clayton-20m,20n
W-322	Melissa Rowell-20m,20n
W-323	Ellie Clane-20m,20n
W-324	Roger Lacy-20m,20n
W-325	Carolyn Hillman-20m,20n
W-326	Gary Fulreader-20m,20n
W-327	Marcus Bollinger-20m,20n
W-328	David C. Vance, Jr.-20m,20n

Table VI-5 Continued

W-329	Lee D. Garges-20m,20n
W-330	Holly Wieder-20m,20n
W-331	Brett Allan Brown-20m,20n
W-332	Gregory Beinhott-20m,20n
W-333	Jill Zeller-20m,20n
W-334	Victor Roberts-20m,20n
W-335	Andrew Austin-20m,20n
W-336	Caroline Barnes-20m,20n
W-337	Jule A. Zacher-20m,20n
W-338	Frieda Rapp-20m,20n
W-339	Alison S. Holden-20m,20n
W-340	Hern Bemis IV-20m,20n
W-341	Dyan M. Jaylor-20m,20n
W-342	Helen B. Marshall-20m,20n
W-343	Linda Summerlin-20m,20n
W-344	Joel Manher-20m,20n
W-345	Jeffrey Dentsih-20m,20n
W-346	David Zurish-20m,20n
W-347	Dawn Thomas-20m,20n
W-348	Susan Bullwinkle-20m,20n
W-349	Scott Gibian-20m,20n
W-350	Nancy Swanson-20m,20n
W-351	Lois Masten-20m,20n
W-352	Paige Tabbert-20m,20n
W-353	Wendy Krucutz-20m,20n
W-354	Keith Oehmig-20m,20n
W-355	Gloria Snyder-20m,20n
W-356	Peter K. Worley-20m,20n
W-357	Douglas Harrison-20m,20n
W-358	Linda Bohaker-20m,20n
W-359	Lisa Hansen-20m,20n
W-360	P.J. McKenzie-20m,20n
W-361	Robert Warmak-20m,20n
W-362	Mark McClintick-20m,20n
W-363	Brenden Bagdal-20m,20n
W-364	Holly Hamilton-20m,20n
W-365	Pamela Martin-20m,20n
W-366	George Queely-20m,20n
W-367	Jon Staffel-20m,20n
W-368	Jo Andreae-20m,20n
W-369	Amy Jackson-20m,20n
W-370	Laura L. Nelson-20m,20n
W-371	Joel Frederick-20m,20n
W-372	Ethel Byrd-20m,20n
W-373	Thomas Swanson-20m,20n
W-374	Timothy Dearloun-20m,20n
W-375	Stephen Novak-20m,20n
W-376	Tila Balack-20m,20n
W-377	Christa Coleman-20m,20n
W-378	Melora Lueg-20m,20n
W-379	Steve Boynton-20m,20n

Table VI-5 Continued

W-380	Hollis Tiger-20m,20n
W-381	Donna Newell-20m,20n
W-382	Alan Fanta-20m,20n
W-383	Richard Errend-20m,20n
W-384	Mark Yeager-20m,20n
W-385	Stephanie Summerlin-20m,20n
W-386	Christian Hagenlochen-20m,20n
W-387	Sarah Bushong-20m,20n
W-388	Steve Francis-20m,20n
W-389	Rick Froehliek-20m,20n
W-390	Heather Sass-20m,20n
W-391	William Fullilove-20m,20n
W-392	Jack Phillips-20m,20n
W-393	Linda Bobs-20m,20n
W-394	Jan Ortiz-20m,20n
W-395	Thomas Bakey-20m,20n
W-396	Geraldine Kiowaltasea-20m,20n
W-397	Austin Hummell-20m,20n
W-398	James Carlin-20m,20n
W-399	Tina Siart-20m,20n
W-400	Kathleen Schaefer-15s,20m,20n
W-401	Peter Greer-20m,20n
W-402	Marily Hall-20n
W-403	Robin Rehmeyer-20m,20n
W-404	Lesleah L. DeFrisco-15s,20n
W-405	Bill Vail-20n
W-406	James & Judith Moore-20m,20n
W-407	Catherine H. Berwick-15s,20n
W-408	Steven Fuller-20m,20n
W-409	Mary Ann Fuller-20m,20n
W-410	Daniel Longnecker-2h
W-411	Mark Meeks-3h,9t,12fff,15s,16f,17g,18c,19b
W-412	Linda Pohle-20n
W-413	Valerie Friesen-20m
W-414	Stewart Green-15s,20g
W-415	Theresa McCain-12fff,12ggg,5s,20n
W-416	Frank Haurwitz-12ggg,20g,20n
W-417	Walter Hotchkiss-15s,18c,19b
W-418	Robert W. Schutte-9t,18c
W-419	Kathleene Parker-15s,16f,17g,18c
W-420	Gary R. Gentry-20m,20n
W-421	Bruce Powers-15s,20n
W-422	Cindy Polite-20g,20n
W-423	Nat Fleck-20n
W-424	Katherine Heister-20m,20n
W-425	Richard N. Cook-20m
W-426	Shari Dangremond-15s,20g,20n
W-427	Mary Hallam-15c,15i,15w
W-428	John P. Milton-15s,22c
W-429	Jessie K. Everett-20h
W-430	John Starrett-15s,20m,20n

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W-431	Jeffrey Basinger-9cc,15s,16f,17g,17h,18c,19a,19b
W-432	Warren Fairbanks-20m,20n
W-433	Gwen Reyes-1h
W-434	Bruce Jensen-20g,20s
W-435	David W. White-20m,20n
W-436	Antze Stockel-20m,20n
W-437	Dr. Sally Stewart-20m
W-438	Jeanne Hicks-20m,20n,24a
W-439	Pamela Kline-15i,15s,17g,18c
W-440	Glenn & Susan Zeigler-20n
W-441	Michael Tabb-15s,19d,19e,20n
W-442	Anne Plummer-20m,20n
W-443	Don & Mary Baker-15i,18c
W-444	Laura Addison-20m,20n
W-445	Karen Wright-20m,20n
W-446	Agnes Baker-20c
W-447	Carol Ciesielski-20m,20n
W-448	Stella Bailey-7b,9s,20n
W-449	Anne Wotipka-Gloscia-9v,15s,17g,17h,18c
W-450	Chris Nall-15s,20n
W-451	Sammy Frances-20m,20n
W-452	Robert & Sharon Spangler-15s,16f
W-453	Robert & Sharon Spangler-17g,17h,18c,19a
W-454	Melinda Reed-20n
W-455	Colorado Mining Association-5s,15e,15f,15s,16d,17g,18e, 18i,20q
W-456	Edith Pool-15s,20n
W-457	Dale Reed-16d,20m,20n
W-458	Richard J. Maron-20g
W-459	Tom Couchman-20g
W-460	John Domingue-9u
W-461	Don Thompson-15s,18c,20j
W-462	Donald Bachman-15s,16f,17g,18c
W-463	Kathy Bollhoefer-15s,19d,20n
W-464	Mrs. A. William Hall-20m,20n
W-465	Bill King-9a
W-466	John Swanson-20g,20n
W-467	Francie Lopez-15s,20m,20n
W-468	Brooke & Eric Durland-17g,17h,18c,19b
W-470	Joseph McCain-15s,20n
W-471	Steve Wachterman-15i,20g,20n
W-472	John Wallace-18c
W-473	Jack Berga-21j,21k
W-474	Beverly & Tony Baker-15s,20n
W-475	Paul Weis-15q,15s,16f,18c
W-476	Richard Reynolds-15s,20m,20n
W-477	Jim Bock-15s,18c,20n
W-478	Michael Childs-20n
W-479	Donald E. Potter-15s,16f,17g,18c
W-480	Shelley Raap-1g,21f

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W-481	Betty Salısbuny Prınce-20n
W-482	David Waddıngton-15s,17f
W-483	John Faurot-9cc,15s,20n
W-484	Lında Bennett-20n
W-485	Mary Ruth Corya-20m
W-486	Carol Thompson-20n
W-487	W.E. Summers-20n
W-488	Thomas P. McKenna-2h
W-489	Scott Newberger-2h
W-490	Mark Murphy-2h
W-491	Joni Noel-2h
W-492	Debra Hepps-2h
W-493	Mıchael Shannon-2h
W-494	Sara Wubben-2h
W-495	Lauren Moon-2h
W-496	Jaye White-2h
W-497	Dana (ıllegıble)-2h
W-498	Audrey Brodıe-2h
W-499	Stephen Kaspar-2h
W-500	Nayıbe Galındo-2h
W-501	Phılıp Palmer-2h
W-502	Shelly Scholes-2h-2h
W-503	Al Ball-2h
W-504	Ray Watson-2h
W-505	Peter Kubaiujn-2h
W-506	Suzann Merriman-2h
W-507	C. Dyer-2h
W-508	Mıchael Tessem-2h
W-509	Corby Setlın-2h
W-510	Darin Boles-2h
W-511	Rıchard Welch-2h
W-512	Samuel Oruck-2h
W-513	Janey Holden-2h
W-514	Greg (illegible)-2h
W-515	Krıstin Petersen-2h
W-516	John Anderson-20g,20n
W-517	Dorothy Gumaer-19b,20g
W-518	Davıd Wıcks-17g,17j,18c
W-519	Brook & Erıc Durland-15s,16f
W-520	John Holder-20m
W-521	Beverly Foltz-20m,20n
W-522	Dana Ivers-No response requıred
W-523	Thomas M. Holland-15c,15g,15s,16f,17f,18m
W-524	Jon Sirkıs-20m
W-525	Karl Rysted-15c,15s
W-526	Tom Wolf-15b,15s
W-527	Kae Bernhardt petıtıon w/13 names-20g,21ı
W-528	Jım Beyer-20m,21ı
W-529	Randall D. Leever-20m

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W-530	Judith Lowe - Aspen Wilderness Workshop-15s,16f,17g, 17h,18c,19b
W-531	Alica H Howe-17g, 17h,18c
W-532	Rosalind McClellan-15s,15w,16f,17g,18c,20d,20m,20n, 21b,21i,21k
W-533	Bella Hecht-15s,17g,17h
W-534	Theodore Wright-20n
W-535	Johnnye Dee Loop-20g,20m
W-536	Edward Gubrud-20m,20n
W-537	Brook Burbaink-20g,20n
W-538	Michael Farady-20k
W-539	James Robieson-20n
W-540	Janet Phillips-17a,17f
W-541	Jim Towns-20m
W-542	Marie Crone-15s,16f,17g,18c,20m
W-543	Brett Arnold-17a,17h
W-544	Bernie Fay-17a,17g
W-545	Mark Bryant-20m
W-546	Phil Wells -15e
W-547	Concerned Citizens for Spanish Peaks petition w/26 names-17g
W-548	Jon Sudar-17a,17g
W-549	G. Arthur Stephens-20n
W-550	Elaine Vickers-20n
W-551	Cary Linn & Ron Cardinas-20n
W-552	Bruce Berger-15s,16f
W-553	Wesley C. Allen-15s,16f,17g,18c
W-554	Charles B. Dustin-15e
W-555	Mark Pearson-3nn,3oo,17g,17h,18a,18c,18h,18k,18m,18n
W-556	Jeff Briggs-20g,20n
W-557	Richard Westerman-15e
W-558	Robert & Judy Armagast-20n
W-559	Miles & John Coleman-15e
W-560	Louis & Alice Cherbeneau-20n
W-561	John Wallace-15s
W-562	John Wallace-17g
W-563	Stuart Mace-20n
W-564	Alvin Edlund-20j
W-565	Richard McDonald-7g,20n
W-566	Richard Matthews-17g,18c
W-567	Mark Tanner-20g,20n
W-568	Susan Morgan-9www,15s,18b,20n
W-569	Teresa Giffin-17g,18c,19b,20g
W-570	James Tanner-15s
W-571	Scott Flora-20n
W-572	Theodore Moore-15i,15s,17g
W-573	Frank Staub-20l
W-574	Reed Dils-18c
W-575	Geogine Harkness-3c
W-576	Dick Scar-9t,18c,18d,20n
W-577	Marci Kolker-2h
W-578	Jay Polburn-2h
W-579	Stephen Kugas-2h
W-580	Brad Storn-2h

W-581	Roger Humr-2h
W-582	Pam Miller-2h
W-583	King Dixon-2h
W-584	Bill Murphy-2h
W-585	Lou Richard-2h
W-586	Andrew Butler-2h
W-587	Lynne Tracer-2h
W-588	(illegible)-2h
W-589	Cathy Groth-2h
W-590	Terry Van Thader-2h
W-591	Michael Martin-2h
W-592	Bill Wright-2h
W-593	Daniel Swanley-2h
W-594	Martin Polt-2h
W-595	Wendy Briggs-2h
W-596	Brigid Sweeney-18l,2h
W-597	Huerfano Valley Citizen's Alliance-3r,15s,16f,17g
W-598	Noranda-6p,15e
W-599	Scott Herman-15r
W-600	Bob Dowling-20n
W-601	Minerals Exploration Coalition-6q,15e,15f,17i,18i
W-602	Judith Peterson-9v,20n
W-603	William Hudson-15a
W-604	Kenneth & Josephine Van Leuven-20n
W-605	Leon Bright-15s
W-606	Michael Pair-20m,20n
W-607	Laura Bristol-17g
W-608	Denver Audubon Society-15c,15s,16f,17g,18c,19b,20n
W-609	Mailyn Martorano-20n
W-610	John Cryer, III-20n
W-611	David Mazel-15s,15t
W-612	Leaf Bright-No Response Required
W-613	Lynne Keahey-15s,16f,17g
W-614	Arleen Wagner-20g
W-615	Ronald Meardon-No Response Required
W-616	Bill Haynes-9yy,15s,17g,20g,20n
W-617	Kent Mace-11f,15b,15s,17g
W-618	Robert Antiel-15s,20n
W-619	Don Richmond-15s
W-620	John Wade-15i,16e,17g
W-621	Marilyn Snyder-15s
W-622	Peter O'Brien-14q,15s,20g,20n
W-623	Rosalyn McCain-15s,16f,17g,20g,20n
W-624	Nancy Powers-16f,20g,20n
W-625	Marge Durrum-15s,17a,18c
W-626	Ralph Jennings-20g,20n
W-627	Craig Franklin-20m,20n
W-628	William Thompson-20m,20n
W-629	Debbie Miller-15s
W-630	Jan Meadows-20n
W-631	Mark Miller-15s
W-632	Roger Williams-20n
W-633	Micky Carter-16f,17c

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W-634	Lyle Nissen-10l,15s,21a
W-635	Bob Dunsmore-15i,15s
W-636	Louise Williams-20n
W-637	Larry Randolph-17g,20l,20n
W-638	Gary Kreutzer-17g
W-639	Jaysun Hammond-20m,20n
W-640	Neil Seitz-15s,20h,20n
W-641	John Sisk-20b,20m,20n
W-642	Ivan Gylling-15e,20p,20r
W-643	Steve Kornher-15s,18c
W-644	Richard Doyle-15s
W-645	Joel Kaufman-20n
W-646	Kim Norgren-20e,20i,20j,20n
W-647	Ernest Endrizzi-3r
W-648	Janet Kinniry-3x
W-649	Jim Phillips-20g,20n
W-651	Peter Ruck-20n
W-652	James Campbell-15s,16e,17g,18c
W-653	Janet Kinniry-15s,15x,16f,17g,17h
W-654	Bruce Schecter-20r
W-655	John Young-20n
W-656	Matt Weber-20g,20n
W-657	Tammy Bartlett-20n
W-658	Jeff Rennicke-15s,17g,18n,20g,20k
W-659	Mark Bosley-20m
W-660	Andrew McConkey-15s,20g
W-661	Linda Kenagy-15s,20n
W-662	Greg Gale-20m
W-663	Hans Krimm-20m
W-664	Geoffrey Mason-15s,20m,20n
W-665	Denise Dralle-18l,20m
W-666	Donald Parker-9www,19d,20n
W-667	Lee Sessions-20n
W-668	Thomas Sisk-15g,15s,17g,18c,19b,19c,20l,20m,20n
W-669	Irving Prais-16f,19c,20n
W-670	Rosalind McClellan-15s,15w,16f,17f,18c,20m,20n
W-671	Donald Rendall-3r,3ww,15s,16f,17g,18c,18a,20n
W-672	Nicky Carter-18c
W-673	Lisa Novak-No Response Required
W-674	Amy Schaaf-20k
W-675	Larry Mehlhaff-3s,15s,16f,17g,18c,19a,19b,19c
W-676	Pat Clark-20g
W-677	Robert Naatz-20n,21f
W-678	Barbara Dell-12ff,20c,20g,20m
W-679	Dan Sullivan-20m,20n
W-680	Charles Clifton-12tt,15s,18c,18d
W-681	Carl Bandy-20m
W-682	John Williams-3a,14q,15s,17g,17h,18h
W-683	Bernard Zeligman-3s,15s,17g,18c,19a,19b
W-684	Rocky Smith-3s,14f,15d,16f,17a,18c,18o,19a
W-685	Chris Weaver-20g
W-686	Peter Eisele-20n
W-687	Ed Gubrud-17g,20n

Table VI-5 Continued

W-688	Michael Baron-20m,20n
W-689	Mark Peters-31,15s
W-690	Robert Warren-20m
W-691	Janet Oliver-20m,21k
W-692	Norm Mullen-3s,19a,19c,20g
W-693	Ross Barnhart-20c,20n
W-694	Katie Soden-20m,20n
W-695	Charlie Peterson-20n
W-696	Marian Busey-17g
W-697	Jim Busey-17g,20n
W-698	Dan Shields-17g,20n
W-699	Jan Kelley-16f

Assigned Number	Individuals Or Organizations Responding to the Plan After Comment Period
L-10	Tom Gillis-9i,23a
L-11	Daniel Sullivan-1a,10m,15d
L-12	Bella Barbara Hecht-20n
L-13	Mark Slater-20m
L-14	Jan Lowen-9i,23a
L-15	Larry Caudill-15d,15h,15j,15k,15l,15m,15n,15o,15p,20a
L-16	Edward M. Bouchard-18c,19b,15s,16d,17a
L-17	Bella Harber-6m

PUBLIC COMMENTS ON THE DRAFT EIS AND PROPOSED PLAN AND FOREST SERVICE RESPONSE

This section displays comments, received on the Proposed Forest Plan and Draft Environmental Impact Statement, and the Forest Service response to those comments.

The responsible official has determined that a summary of the nongovernment comments is appropriate. This is within the framework of NEPA (40 CFR 1502.9(b) and 1503.4). The summary reflects all substantive nongovernment comments received on the Draft EIS and proposed Forest Plan. Similar comments have been combined into a single comment.

Regulations for implementing the National Environmental Policy Act (40 CFR Part 1503) require the Forest Service to assess and consider all comments received on the Draft EIS. These regulations also require a Forest Service response to these comments. Because the number of comments received was voluminous (over 1,000 comments) members of the ID team grouped those comments which expressed the same concern or asked the same question (40 CFR 1503.4(b)1). In some instances, representative comments or phrases were quoted directly. Appropriate responses and the necessary changes were then made in the documents. Summarizing the comments was done to make this section of the EIS easier to read and understand, and to reduce printing and distribution costs. Editorial changes suggested by commentors were changed in the text, when appropriate, and are not included in the comment and response section of the chapter.

Local, State and Federal agency letters are published in the last part of this section. Comments within each agency letter are numbered and correspond to the numbered Forest Service response.

See page iii, Table of Contents, for a listing by category of the comments and Forest Service Response or action taken.

Comments From The Public

Comments along with Forest Service response are organized by topic heading. Numbers preceeding each comment correspond with the numbers assigned to each commentor in Tables VI-4 and VI-5. Topic heading number and alpha letter are displayed after commentor name in Table VI-5 to aid in locating an individual(s) and or organization(s) comment and the Forest Service Response and/or action taken.

1. ALTERNATIVES

Comment: F-126, F-136, F-289, L-11

a. Alternative A will cost too much and will not be funded at that level. Timber sales on the Front Range are not cost efficient.

Response:

a. Alternative A is the second most cost efficient alternative when considering all resource benefits. It produces goods and services with the second highest present net value. See Comparison of Alternatives Through Ranking by PNV, Chapter II of this document. Funding of Forest Service programs is determined by Congress. The Forest Plan is the basis for budget proposals, however, only Congress can determine the level at which Forest Plan activities will be funded. The market for timber products, especially fuelwood, allows an increase in the timber program with timber activities designed to benefit other resources. Discussion of vegetation management, and the multiple resource benefits accrued from timber management are more fully explained in the Plan and EIS. See the sections Resource Elements in Chapter II of the Forest Plan; and Alternative A in Chapter II, Timber in Chapter III, and Vegetation in Chapter IV of the FEIS.

Comment: F-170, F-283

b. Alternative A is nothing more than total exploitation of a fragile ecosystem, and has two main stumbling blocks:
- High start-up costs; and
- Non-market outputs tied to large increase in timber volume. Who is going to buy all this timber?

Response:

b. The Forest Plan (Alternative A) provides a balance of multiple resource goods and services from National Forest System lands. The Management Requirements Section in Chapter III of the Plan insures that all resource values, including fragile ecosystems are protected, maintained and/or improved when resource development activities occur. Implementing Alternative A (the Forest Plan) requires higher costs than the current Forest budget. See Economic Effects in Chapter IV, FEIS. The ratio of non-market outputs (goods and services) to market outputs, with an increased timber management program is more favorable than with a reduced program. The demand for wood fiber has increased

to the point that all timber offered has sold, including sales offered for commercial sawlog use being purchased by fuelwood users and retailers. The situation is not expected to decrease, rather demand for wood products is forecast as growing.

Comment: FW-7

c. Alternative A is very expensive and potentially damaging to other Forest resources. Increases in allowable timber harvest and inflated sustained yield figures scare us. Would like to see alternative similar to A in amenities, but much lower timber cut and cost.

Response:

c. Alternative A includes timber harvest levels well below the potential for sustained yield In Alternative A the timber program is designed to provide benefits to other resources, such as, wildlife, water yield, and visual quality.

Comment: F-307 FW-3

d. Alternative A falls far short of reaching the goals of providing amenity values and non-commodity outputs. More area should be recommended for wilderness.

Response:

d. Alternative A was designed to provide a balanced program in response to issues and concerns, projected demands, land capability, and economic efficiency. Alternative A does meet this balance. Expressions of public concern regarding wilderness recommendations have resulted in an additional 36,000 acres of Buffalo Peaks Wilderness Study Area being added to the wilderness recommendations in the Final Environmental Impact Statement. See Changes Between the Draft and Final EIS, Chapter I; Alternative A in Chapter II, and Wilderness Study Areas in Chapter VI of this document.

Comment: FW-8 F-301

e. Alternative A is not an amenity alternative. It involves more timber cutting and road building which will not benefit recreation, wildlife, or wilderness. It will also cause more soil erosion and reduce water quality.

Response:

e. Vegetation management will benefit wildlife through improvement of both horizontal and vertical diversity. Management requirements in Chapter III of the Forest Plan insure that adverse impacts such as increased soil erosion rates (above natural levels) are kept at a minimum or are reduced entirely. These same requirements also provide management direction

that maintains or improves water quality. See the Forest Direction section and Management Area Prescriptions, Chapter III, Forest Plan. Many roads needed to manage vegetation will be closed to protect wildlife habitat effectiveness, where needed. Others will be designed and constructed with future consideration of recreation needs Alternative A provides for about 650,000 acres designated for nonmotorized recreation use. This is a 350,000 acre increase over existing use.

Comment. F-301

f. Economic analysis does not include costs of local roads. Alternative A will have the greatest environmental impact on the Forest.

Response:

f. Alternative A is a balance of resource development activities which emphasize income producing goods and services. Alternative A also provides a strong consideration of the need for more wilderness as well as improves wildlife habitat and recreation opportunities on the Forest

Costs of local road construction were built into the economic analysis as part of the cost of doing business. The planning record contains these values. Planning records are available for review at the Forest Supervisor's Office, Pueblo.

Comment: F-109; F-312 F-269; F-248 F-170; F-292 F-259; F-28 FW-8; W-480

g. Current management should be continued because it better reflects the needs of local economies and the limitations of higher elevation environments. Alternative B is the best choice.

Response:

g. Current management levels will not keep up with demands and needs of a changing social and economic environment. A large part of the forested areas have grown toward maturity, thereby increasing susceptability to insects and diseases, with reduced wildlife habitat diversity, reduced water yields and reduced range outputs.

Alternative A has been designed to address these changing conditions on the Forest as well as to, as nearly as possible, meet public demands and resolve issues and concerns relative to National Forest management

Comment: F-234; W-90 W-433; F-123 F-14; F-283 FW-8

h. Recommend Alternative C because it strikes a better balance between timber supply and demand and has more wilderness recommended. Could make minor revisions in land line location and land acquisition to bring budget to a reasonable level.

Response: h. Alternative C was designed to meet all aspects of the Forest and Rangeland Renewable Resources Planning Act (RPA) goals. These do not, in all cases, fit the specific demands and needs on the Forest. The land line location and land acquisition programs in this alternative are a direct reflection of the National RPA goals. The wilderness recommendations in Alternative C exceeds current demand for this recreational experience. Vegetation treatment will not provide the necessary benefits to wildlife or meet the need for fuelwood. Alternative A which better meets these objectives has been adjusted in the Final Plan to increase wilderness recommendations. Projected landline location costs have been readjusted. See Changes Between the Draft and Final EIS in Chapter I, and Alternatives Considered in Detail in Chapter II, of the FEIS.

Comment: FW-8 i. Alternative A is biased with its resource values, i.e., timber at $37.20 MBF and increasing, recreation not increasing and wilderness at only $8.00/RVD.

Response: i. A new timber value study was done. This information is available in the planning records in the Forest Supervisor's Office, in Pueblo. This new study reflects the increased prices based on increased demands in the past few years. National RPA values were used for resources such as wilderness values where local data was unavailable Resource values used in the PNV (present net value) reanalysis are displayed in Benchmark Analysis, Chapter II of this FEIS. First quarter, 1978 dollar values were used for the reanalysis. A new timber value was established and real price increases were eliminated.

2. ECONOMICS

Comment: F-338 a. Economic analysis is heavily skewed in favor of commodity resources. Projected timber values appear unrealistically high while projected recreation values are low.

Response: a. Values used in economic analysis are RPA values except where values are available through local analysis. The Forest completed a study in 1981 that resulted in the $37.20/MBF value for timber. This study is a part of the Forest planning record and is available for review at the Forest Supervisor's Office in Pueblo. Values

for other resources are from the 1980 RPA projections which were used where other values were not available See response 1.1. above.

Comment: F-338

b. Evaluations of alternatives should not include constraints of certain resource outputs. Maximum present net value (PNV) cannot be determined when output levels are constrained.

Response:

b. Constraints were set to insure simulation of the alternative. The constraints in the linear program model (FORPLAN) helped determine estimations of goods and services that could actually be produced by each alternative This also permitted the FORPLAN model to determine the most cost-efficient mix of prescriptions which would achieve a desired goal or goals. Constraints also allowed the model to schedule goods and services over time. The objective function determined the maximum present net value of the alternative.

Comment: F-258

c. Benefit values are unrealistic.

Response:

c. See response 2.a.

Comment: F-258

d. Cost-benefit analysis should be by resource not by entire alternative.

Response:

d. The National Forest Management Act (NFMA) regulations require a cost/benefit analysis of each alternative rather than by individual resource. Cost/benefit analysis by individual resource is displayed in Appendix E, Benchmark Analysis.

Comment: W-231

e. Timber harvest provides jobs for people for a few years but leaves bare spots and nothing is left.

Response:

e. Reforestation is an integral part of the timber sale planning process. Areas where reforestation cannot be accomplished are not scheduled for harvest. An interdisciplinary team is involved in sale planning which includes soil scientist, hydrologist, silviculturist and other skills. Mitigation measures are incorporated into sale design to ensure wildlife will benefit and soils

are not damaged. Management requirements in Forest Direction and Management Area Prescriptions, Chapter III, Forest Plan insure that timber management activities do not leave bare spots where nothing is left. Quite the contrary occurs; mature forest stands which have reached maximum growth, volume and quality are utilized and are soon replaced by vigorous, healthy new growth. This not only provides diverse habitats for wildlife but insures a continuing forest with esthetic qualities that are pleasing to both Forest users and visitors.

Comment: F-170

f. Areas adjacent to wilderness are scheduled for cutting. Timber sales in areas adjacent to wilderness are not economical. Quit selling resources at a loss.

Response:

f. Suitable timber resource areas adjacent to Wilderness are a part of the timber resource base and, therefore may be scheduled in the 10 year sales program. Specific areas are evaluated in detail, which includes an economic analysis.

Comment: F-163 F-75 F-275

g. Support Quail Mountain Ski Area development because it would create jobs, business opportunities and stimulate economy.

Response:

g. 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 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.

Comment: W-410; W-489 F-126; W-577 W-490; W-491 W-492; W-493 W-494; W-495 W-496; W-497 W-498; W-499 W-500; W-501 W-502; W-503 W-504; W-505 W-506; W-507 W-508; W-509 W-510; W-511 W-512; W-513 W-514; W-515 W-596; W-578 W-579; W-580 W-581; W-582 W-583; W-584 W-585; W-586 W-587; W-588 W-589; W-590 W-591; W-592 W-593; W-594 W-595

h. Support original RARE II recommendations for WSAs and Lost Creek FPA based on economics, wilderness is the best choice

h. Economics is an important part of the analysis, however, capability, suitability and need also are considered. See the section, Congressionally Designated Study Areas, under Wilderness in Chapter Chapter III, Final EIS. Legislative Environmental Impact Statements have been prepared for the four Wilderness Stude Areas and Lost Creek Further Planning Area These EIS's are a part of the planning record for the Forest Plan and are available for review in the Forest Supervisor's Office in Pueblo Also, see Appendix C, Final EIS. This appendix contains the Wilderness Study Area and the Further Planning Area Reports

Comment: F-120

i. Actively seek the help of clubs and service organizations to become more involved in keeping the Forests open to all the people to substitute for lack of funds.

Response:

i. The Forest has been doing this and will continue to seek such assistance.

Comment: F-234

j. The socio-economic analysis of the Leadville HRU is no longer valid.

Response·

j. It is now revised to acknowledge changes caused by reduced mineral activity. See Social and Economic Setting in Chapter II, of the Forest Plan and Human Resource Units in Chapter III of this EIS.

Comment: F-258

k. The economic analysis is incomplete and confusing.

Response

k. The Final Environmental Impact Statement contains revised and expanded discussions of economic analysis. See Economic Efficiency and Benchmark Analysis in Chapter II, Social Setting

and Economic Setting in Chapter III, and Economic Effects in Chapter IV and Appendices D, E, and K, FEIS. The economic analysis conducted and presented in the Forest Plan and EIS is sufficient to support the level of decisions made in the proposed action. Before projects are implemented, site specific economic analyses will be carried out to obtain additional information regarding costs, productivity and anticipated environmental consequences. This is not to say that such information has not already been considered in the analysis. Site-specific economic and environmental analysis provides the necessary decision making analysis for proposed project activities.

Comment: F-259

l. The proposed Forest Land Management Plan seems overly indulgent and expensive regarding sound economically justifiable silvicultural practices.

Response:

l. The Plan reflects the needs as identified by issues, concerns, and resource inventory. Silvicultural practices planned, support improvement of other resources, and show a positive Cost/Benefit ratio when evaluated as a total alternative.

Comment: F-214

m. The main emphasis of alternatives is on economics at the expense of the less tangible esthetic considerations.

Response:

m. The main emphasis of the alternatives is on a balanced mix of resource development and uses, opportunities addressing issues and concerns, anticipated demands and land and resource capability.

Economic evaluation is an important part of the planning process. Wildlife, recreation, wilderness, and water values are considered in the economic analysis.

Comment: F-234

n. Proposed timber harvests in Lake County will be detrimental to scenic attractiveness, thereby damaging its chances for future economic stability.

Response:

n. Public comment indicated a need to re-analyze timber management activities planned for Lake County. As a result, the Forest Plan has been revised. The planned timber program in the Leadville area (Lake County) has been reduced by nearly 50%. Management Area Prescriptions emphasizing dispersed recreation opportunities, aesthetic values and wildlife

habitat have been allocated to areas where prescriptions emphasizing timber harvest designed to increase water yield were previously allocated. See Forest Direction and Management Area Direction in Chapter III, Forest Plan and the Forest Plan Map. The Section, Changes Between the Draft and Final EIS, Chapter I, FEIS, also discusses this change.

Comment: F-211

o. The economic analysis is confusing and fails to give the reader the necessary information for analyzing the Plan from this perspective.

Response:

o. See response to comment 2K, this section .

Comment: FW-7

p. "Economic data is confusing, poorly organized, and difficult to draw conclusions from." It appears that timber operations are too expensive (DEIS, pages 99-100) and that economically, all Wilderness Study Areas should be wilderness. However, the proposed alternative recommends the opposite.

Response:

p. See response to comment 2K this section.

Recommendations for wilderness suitability are based on a wide range of considerations, not just an economic evaluation. Appendix C, of this document, discusses the reasons for the Forest Service wilderness suitability recommendations for the Wilderness Study Areas.

Comment: FW-7

q. Where is the money for increases in budgeting (over 1981 levels) going to come from? The Federal economic picture offers no hope. "The DEIS does not adequately address this."

Response:

q. Only the United States Congress can determine the level at which Forest Plan activities will be funded. The Plan displays planned activities with projected goods and services that meet demands and desires of Forest users. Budget limitations may reduce the Plan's projected level of outputs, and may cause the Plan to be amended or revised.

Comment: F-258

r. How were timber values established?

Response:

r. The values used for timber prices reflect actual bid prices averaged over the years 1974 to 1978.

Comment: F-258

s. Cost values are not given in the economic section.

Response:

s. Cost values were to numerous to include in this document. They are available for review in the planning record, Forest Supervisor's Office, Pueblo, CO.

Comment: F-258

t. PNV for individual resources should be included.

Response:

t. The alternatives are analyzed as a complete set of prescriptions to simplify comparison. An alternative is selected on its overall costs and benefits and not on individual resource costs and benefits because all resources are inter-related. Requirement is an analysis of each alternative. See response to comment 2d this section.

3. PLANNING PROCESS

Comment: F-308 W-682

a. Park County should be in a Front Range Social Resource Unit (SRU) because it is more affected by Denver and Colorado Springs.

Response:

a. Social Resource Units (SRU) were established in the Regional Planning process. These units were further divided into Human Resource Units (HRU) to provide a more detailed assessment of social settings compatible with this Forest Planning process. The planning record contains additional discussion on how and why Social Resource Unit boundaries were determined. This information is available for review at the Forest Supervisor's Office, Pueblo.

Comment: F-308

b. Should include names of all communities with post offices that are within the HRU so no one community would be insulted.

Response:

b. The names of communities were listed simply as an aid to identifying the location of the HRU by mentioning the larger communities.

Comment: W-575

c. There is a conflict in the Plan. It indicates special land classifications and withdrawals will not change. Yet the Plan also indicates withdrawals will be reviewed to determine if they are still

appropriate (Re: City of Colorado Springs agreements).

Response: c These withdrawals will not change for this Plan. However, by law all mineral withdrawals must be reviewed by 1989 except the watershed agreements with the cities of Colorado Springs and Manitou. These watershed agreements should not have been included on the list even though they are withdrawn from mineral entry. This has been corrected in the Final Plan. See Considerations That Remain Constant in all Alternatives, Chapter II, FEIS.

Comment: F-338 d. The Forest must prepare for public comment a more complete, documented revised draft (Plan) in accordance with legal and regulatory requirements.

Response: d. Extensive changes have been made in the Forest Plan and the Environmental Impact Statement. The section, CHANGES BETWEEN DRAFT AND FINAL, displays the changes in both the Plan and EIS that have been made. These changes have been necessary, due in part, to comment received on these documents during the formal comment period, as well as to management's concerns relative to new or revised data and analysis requiring reassessment of some decisions and information displays.

Comment: F-257 e. Lumping of grasslands with the Forest lands makes it impossible to see how the Plan relates to grasslands. Should develop separate grassland management plan.

Response: e. The prescriptions used in conjunction with the maps illustrate how the grasslands will be managed. The planning process is the same for grasslands and Forest areas. Developing one Forest Plan where these Grasslands and these two Forests are in one administrative unit is required by law. The planning records contain much detailed analysis specific to the National Grasslands. It is more cost efficient to incorporate both in one planning process. Additional Management Area Prescriptions have been allocated to parts of the National Grasslands. See Management Area Direction, Chapter III, Forest Plan and the Forest Plan Map.

Comment: F-257 f. The description and management of grasslands is too simplified. There should be management prescriptions for each vegetative sub-community. Management Area Prescriptions (format) are too simplified and do not adequately allow for resource protection.

Response: f. The diversity of the National Grasslands and their plant communities is recognized. Additional Management Area Prescriptions have been allocated to parts of the National Grasslands to provide more specific management requirements. The condition and potential of different ecosystems to produce various resource outputs have been considered in the planning process, and will be considered in all site specific management studies and plans. Management Area Prescriptions have been improved over these displayed in the Proposed Plan. Each prescription is a multi-resource integrated management strategy for the area involved. All prescriptions provide for the protection of various resource values. See Management Area Prescriptions, Chapter III, Forest Plan and the Forest Plan Map.

Comment: F-301 g. Growing wilderness demand recognized in the DEIS (pg. 112) is not reflected in output objectives in the Plan in Table III-1. Appears to be a conflict.

Response: g. Table III-1 (Forest Direction, Chapter III) of the Plan indicates annual outputs for wilderness use capacities will more than meet projected demand as indicated in the DEIS, P. 112. Table III-1 projections are based on acres of existing wilderness plus recommended acres of Wilderness Study Areas.

Comment: F-257 W-411 h. The Plan emphasizes timber harvest and minerals commodity outputs. Analysis should include esthetics such as wilderness and wildlife diversity. Wilderness studies show wilderness is more valuable as wilderness than as non-wilderness.

Response: h. The economic efficiency analysis of Wilderness Study Areas does show wilderness has a better Present Net Value. However, the Plan must also address other resource needs and consequently, selecting the alternative with the best PNV may not meet the necessary objectives.

Comment: FW-8 i. Distance criteria for determining "need" for wilderness is arbitrary and subjective.

Response: i. A distance of 150 miles was used simply to illustrate the proximity of wilderness within one-half days drive.

Comment: FW-8

j. Wilderness Study Area Reports do not adequately analyze environmental effects which cannot be avoided. Effects on specific resources should be listed.

Response:

j. Additional discussion has been included regarding effects on specific resources such as water quality, visual quality, wildlife, recreation and access, in the final Wilderness Study Area reports. See Appendix C, this document.

Comment: FW-8 W-28

k. Resource values used in present net value analysis are incorrect. Not all values were in FORPLAN, therefore analysis is incorrect.

Response:

k. The values used in the resource allocation model (FORPLAN) were taken directly from published national and regional studies. The dispersed recreation value is a combination of big game and small game hunting, fishing, nature study and generalized dispersed recreation prices from RPA reports, adjusted to this Forest.

Between the DEIS and FEIS, the FORPLAN model was enhanced through more accurate yield tables and values to provide a more accurate tool to increase the quality of results.

Within the resource allocation model, timber, forage, dispersed recreation and water values were included. The model allocated prescriptions in the most economical method with respect to these resources. Wilderness and developed recreation values were added to the PNV analysis following the allocation process to insure its inclusion in the complete alternative analysis.

Comment: W-689

l. Economics should not influence policy on wilderness.

Response:

l. Economic analyses are required by the National Forest Management Act (1976). Economics is only one factor considered in the overall analysis. Others include social, biological, and a wide range of resource values.

Comment: FW-8 W-28

m. Tables on economic efficiency in Wilderness Study Area reports are unintelligible.

Response:

m. The tables displaying economic efficiency have been revised. Additional explanation has been

included in the final documents. See Appendix C, this document.

Comment: FW-8

n. FORPLAN included only clearcutting as a method of managing spruce/fir. This is not justified.

Response:

n. FORPLAN analysis has been revised and now includes clearcutting, shelterwood cutting, and all aged management prescriptions for spruce/fir.

Comment: F-28

o. The preferred alternative is too close to that of other Forest Plans and leads people to believe the Agriculture Department wants to turn Colorado Forests into strictly commodity producing elements.

Response:

o. There has been no direction to prepare Forest Plans to become strictly commodity producing. The Plan is a balance of commodity and amenity goods and services which have been analyzed and determined in light of issues and concerns about the Forest.

Comment: F-266

p. Effects on private land within or adjacent to management areas was not considered when designating Management Area Prescriptions. My property borders a 2B management area with motorcycle trail #674 and 675 approximately 100 yards away. The resulting noise has significantly affected the enjoyment of this private property.

Response:

p. Of the several management area prescriptions that might logically be applied to this area of the Forest, none would of itself result in the elimination of the motorcycle trail. This type of problem should be brought to the attention of the District Ranger. If the situation warrants, a trail can be relocated or eliminated within a 2B management area.

Comment: F-258

q. The Plan and EIS should include more details such as costs-benefits of management practices, timber yield tables, activities by year by prescription, and underlying assumptions about relationships between resources.

Response:

q. The Plan is a long-range plan for the Pike and San Isabel National Forests and Comanche and Cimarron National Grasslands. It contains scheduled activities in some broad catagories of planned activities such as timber harvest, road construction and reconstruction, trail construction and reconstruction and trailhead construction. See Appendices A, C and D,

Forest Plan. The resource allocation model (FORPLAN) allocated prescriptions by period (10 year intervals) and scheduled prescription activities out to 240 years. Details of cost and benefit analysis for individual management practices are completed in project specific environmental analysis at the time the project is proposed. Timber yield tables are available in the Forest Supervisor's Office, Pueblo.

Many assumptions pervade the resource allocation model. Some of the principal assumptions were:

- Screening is the major factor in dispersed recreation use, as the timber ages increased recreation is produced;

- Forage production on the National Forest decreases as the stand matures; and

- Water yield is increased through clearcutting and decreases as the stand reestablishes.

Comment: F-301; W-597 F-339; F-126 W-647;F-242 FW-3; W-671 FW-7; F-79

r. Not enough public involvement or opportunities for comment on both the Wilderness Study Area Reports, Draft Plan, and DEIS. Comments were not solicited from local Governments or agencies.

Response:

r. Opportunities made available for public and other agency and local government participation during the planning process were:

- Meetings held at each Ranger District where the public was invited to identify issues, concerns or resource management opportunities.

- Mailings to those individuals and groups who expressed an interest in management of the National Forest, to participate in preparation of the Forest Plan.

- Development of ten citizen involvement groups to participate during the planning process. One group was established within each Ranger District.

- Newsletters mailed periodically outlining the process and soliciting comments.

- Letters sent to local, State, and National Government agencies requesting input.

- Three public hearings held on Wilderness Study Areas.

- Open houses held in each Ranger District and Pueblo

- Proposed Plan and DEIS mailed to everyone requesting a copy and to those on the Forest mailing list This mailing list is available for review in the Forest Supervisor's Office, Pueblo.

- Numerous newspaper articles and television and radio interviews provided information about public involvement efforts.

See the section, CONSULTATION WITH OTHERS BETWEEN THE DRAFT AND FINAL ENVIRONMENTAL IMPACT STATEMENTS, this Chapter.

Comment: W-684 W-675 W-683 W-692

s. Public hearings on Wilderness Study Areas should have been held in Denver.

Response:

s. As a result of public request, open houses to discuss the Forest Plan and Wilderness Study Areas were held in Denver (Lakewood), Salida and Pueblo in October and early November, 1982. Public hearings for the Wilderness Study Areas were held in Alamosa, Salida and Colorado Springs in October, 1982. The response period for the public hearing record was extended to December 15, 1982 to provide additional opportunity for written statements to be included in the hearing record. Additional open houses to discuss the Plan, Environmental Impact Statement and Wilderness Study Areas were held in Lakewood, Leadville, Fairplay, Salida, Canon City, Colorado Springs, Springfield, Pueblo and La Veta, Colorado in November and December, 1982. The Forest Service attempted to allow all interested parties to participate in this planning effort. See the section, CONSULTATION WITH OTHERS BETWEEN THE DRAFT AND FINAL ENVIRONMENTAL IMPACT STATEMENTS, this chapter.

Comment: FW-8

t. More detail should be presented in the Plan and EIS to meet NEPA requirements.

- Should have alternative for mineral leasing.

- Should display effects of mineral leasing on resources.

Response: t. Additional detail has been provided in Chapters I, II, III and IV of the Final EIS. Mineral leasing is an integral part of the Plan alternatives. An unconstrained mineral leasing alternative assuming all areas of the Forest available for leasing was developed. This alternative is described in the section, ALTERNATIVES CONSIDERED AND ELIMINATED FROM DETAILED STUDY, Chapter II, this document. The effects of mineral leasing on resources is discussed and described in the Minerals Section under Direct and Indirect Environmental Effects in Chapter IV of this document.

Comment: F-10 u. Trade-off analysis is needed for each of the alternatives showing there was consideration for the relationships of non-renewable resources, such as minerals, to renewable resources.

Response: u. The analysis does consider the relative values of renewable and non-renewable resources and the Plan and FEIS reflect this consideration. See Chapters I, II and IV of the FEIS Areas where oil and gas leasing would be recommended are identified. No major developments are proposed where high mineral potential is predicted. Minerals activity is stated as compatible with goals of most management areas, subject to identified management stipulations. Stipulations are applied to specific development proposals as required to balance mineral resource activities with other surface resources and uses.

Comment: FW-7 v. The Plan should prescribe management for identified and planned non-wilderness areas with important scenic, geologic, zoologic, botanic, recreational, or other qualities as permitted by law and Forest Service regulations.

Response: v. Management requirements are specified for protection and management of cultural resources, special scenic areas, Research Natural Areas, threatened and endangered plants and animals, and geologic areas. These are contained in Forest Direction and Management Area Prescriptions contained in Chapter III of the Plan.

Comment: F-109, F-266, F-268, F-258

w. The DEIS does not adequately discuss the impacts of the Proposed Plan. Specific items needing discussion are:
- Effects of Management Areas on private land; and
- Long recovery period of clearcut lands at high elevations.

Response:

w. As a result of public comments, a number of changes have been made in the Plan and EIS to better address impacts, including effects on private lands and the recovery period following timber harvest. Chapter IV of the EIS has been expanded to provide more detail in displaying the effects of the proposed action. Management requirements in Forest Direction and Management Area Prescriptions in Chapter III, Forest Plan display and address anticipated recovery periods following timber harvest.

Comment: W-648

x. People are concerned that their comments will not make any difference in the final document.

Response:

x. As a result of public comments, a number of adjustments have been made in the Plan and EIS. Some adjustments are to provide more detail in displaying the effects of the proposed action. A large portion of Buffalo Peaks has been recommended for wilderness. Management Area Prescriptions have been changed in Lake County to reduce emphasis on timber harvest and increase emphasis on wildlife and recreation opportunities. Also, new management areas have been added for aspen management, fuelwood management, and riparian areas. Comments from the public have resulted in significant changes in the Plan.

Comment: F-268

y. The DEIS does not adequately assess resource and budget impacts of the proposed action.

Response:

y. Chapter IV of the Final EIS has been expanded to provide more detail in displaying the effects of the proposed action.

Comment: F-261

z. The plan must be flexible to allow response to changing or new issues and concerns.

Response:

z. The Plan is flexible. Adjustments can be made at anytime conditions change or monitoring indicates a change is needed. Major revisions may require additional public involvement See the section, SUMMARY OF THE FINAL ENVIRONMENTAL IMPACT STATEMENT, for when the Plan will be

reviewed and updated. See Chapter IV, Monitoring and Evaluation, Forest Plan, for how monitoring and evaluation can initiate revising the Plan.

Comment: F-301

aa. Plan emphasizes timber and new roads--this is wrong. Emphasis should be on recreation.

Response:

aa. The Plan places emphasis on increasing developed recreation, dispersed recreation, wilderness, and trail construction. The increased timber program is mainly to support other resources such as wildlife diversity, increased water, and reduce insect and disease susceptability in addition to providing wood fiber. This support will, in large part, result from additional vegetation management accomplished through commercial timber harvests.

Comment: F-307 W-42

bb. Standards and Guidelines and General Direction statements are too general to provide adequate guidance to the land manager. Improve the General Direction, and the Standards and Guidelines to better show how Forest Plan goals will be accomplished.

Response:

bb. Forest Direction has been expanded and additional Management Area Prescriptions have been included in the Final Plan. See the sections, Forest Direction and Management Area Prescriptions, Chapter III, Forest Plan. This direction coupled with output targets is adequate for long range planning purposes and provides guidance for detailed project planning.

Comment: F-301

cc. Standards and guidelines will not necessarily mitigate adverse impacts of management practices. On the ground management does not support that mitigation will occur.

Response:

cc. The results of standards and guidelines providing effective mitigation measures will be monitored as part of the monitoring process. Monitoring, as required by the Plan, will provide a means to check the effectiveness of standards and guidelines in mitigation of anticipated impacts. If they are determined to be insufficient, adjustments will be made. See Chapter IV, Monitoring and Evaluation, Forest Plan.

Comment: F-301 W-28

dd. The DEIS has too much confusing and redundant economic data and analysis. It is not concise, clear, and to the point, therefore, does not meet CEQ regulations 1502.1.

Response: dd. The Final Environmental Impact Statement and Plan have veen revised to better explain and describe in a concise, clear way the analysis conducted in preparing the Plan.

The economic data is very technical and is presented as required by NFMA regulations and Forest Service National and Regional direction. The FEIS does meet the CEQ regulations. Forest Service Economics" by G.R. Gregory, published by John Wiley and Sons, New York (1972) is a very helpful source for information useful in the understanding of the economic analysis and displays.

Comment: FW-8 ee. The DEIS should specify margins of error in data, and estimates to give readers a better picture.

Response: ee. The data used was the best available at the time the Plan was being developed. Much of the data used in the analysis is estimated and it would be impossible to accurately determine a margin of error. Exceptions to this include recent timber inventory data.

Comment: F-184 F-301 ff. The alternatives do not meet CEQ and NFMA regulations. The range of alternatives is too limited, cannot be achieved because of budgets, and do not respond to issues and concerns.

Response: ff. The alternatives meet CEQ and NFMA requirements. Alternatives were developed to respond to issues and concerns. We recognize that budgets will not always be allocated at the levels displayed in the Plan. In these cases, annual adjustments will have to be made to compensate. Future Plan revisions will need to consider and account for any major changes.

Comment: W-113-XC1-P gg. Plan does not offer a balance between development and preservation. Plan should have more wilderness, less timber cutting, less oil and gas leasing, low road maintenance and development, low increases in water yield and no emphasis on highest dollar return.

Response: gg. The Plan provides a balance of resource uses and activities in response to issues, concerns, anticipated demands, and land capability. The Forest Service does not necessarily manage for highest dollar return but to maximize for net public benefit.

Comment: F-258

hh. Difference between Prescriptions are not clearly delineated.

Response:

hh. Prescriptions have been revised. The prescription summaries describe the management emphasis that will be carried out in a particular management area. This displays the major differences between them. Direction for some management activities within a prescription may be the same as that for other prescriptions if it is desireable and will not detract from the emphasis to be achieved.

Comment: F-155

ii. Standards and guidelines are not detailed enough to insure results are as proposed.

Response:

ii. Standards and guidelines have been revised and many include more detail. Specific project plans will include even more detail to achieve desired results. Monitoring will be done to assure accomplishment.

Comment: F-109

jj. Timber and watershed management will achieve the primary goal of the Proposed Land and Resource Management Plan (PLRMP) which is to render all non-wilderness lands unsuitable for future wilderness.

Response:

jj. Less than 1 percent of the productive forest land would be commercially treated in the first decade.

Comment: FW-8 F-258 F-257 FW-7

kk. The DEIS fails to describe a range of alternatives required by NEPA and the regulations of CEQ. Specifically:

- No alternative includes wilderness recommendations for the Lost Creek Further Planning Area.
- All WSAs and the FPA are not included in an alternative.
- Alternative C with less land acquisition costs.
- Permitted livestock grazing, increases in all alternatives.
- Wider range of oil and gas leasing between alternatives.
- Timber sale quantity (ASQ) increases in all alternatives.
- With decreasing commodity outputs.

- Combine full wilderness with high commodity outputs.

- Total miles of road construction increases in all alternatives.

Response: kk. The alternatives developed, analyzed and considered meet NEPA and CEQ regulations and represent a reasonable range of alternatives. They were developed as possible ways of meeting issues and concerns, demands, economics, and land capability of the Forest. All of the Lost Creek Further Planning Area is recommended for inclusion in the National Wilderness Preservation System in Alternative C. See Appendix C and the section, Alternatives Considered in Detail, Chapter II, this document. See the section, CHANGES BETWEEN THE DRAFT AND FINAL EIS, Chapter I, FEIS, for discussions of Wilderness Study Areas and Lost Creek Further Planning Area considered for wilderness designation in the alternatives.

Comment: F-282 F-327 ll. Reduce 9B Management Areas in Lake County.

Response: ll. The acreage amount of Management Area 9B in Lake County has been reduced. Re-analysis of the Plan resulted in changing all of the 9B Management Prescription Areas, with emphasis on increased water yield through vegetation manipulaton, 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 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.

Comment: F-301 F-2 mm. Denver Water Board's proposal to construct major storage facilities in the National Forest should be addressed in the Plan and EIS, as well as the Corps of Engineers jurisdiction of Section 404 of the Clean Water Act.

Response: mm. The Denver Water Board's proposal for the Two Forks project on the South Platte River is discussed in the section, Facilities, Chapter

II, Forest Plan and in the EIS, Chapter I, under Scope of Issues to be Addressed. The Corps of Engineers' jurisdiction of Section 404 of the Clean Water Act is addressed in the section, Resource Elements, Chapter II, Forest Plan and the section, Resource Elements, Chapter III, FEIS. Water developments, (impoundments, diversions, energy generation) will be addressed in environmental documents prepared in compliance with National Environmental Policy Act requirements. This will be done on a case-by-case basis as each situation arises.

Comment: W-57 F-258 FW-7 W-555

nn. The DEIS fails to note the conclusion of the Analysis of the Management Situation (AMS) which found that all WSAs could be designated without effecting needs for Forest-wide commodity outputs.

Response:

nn. The DEIS did not note the conclusion displayed in the AMS regarding commodity output levels along with all wilderness alternatives. The FEIS addresses this issue, however, commodity production is only one of many issues studied.

Final decisions are based on more than total Forest-wide resource demands. Each WSA was studied individually to determine its suitablility or unsuitability for inclusion in the Wilderness Preservation System. The FEIS has been revised to insure an accurate display of commodity output needs and resource demands. See Chapter IV, FEIS.

Comment: F-211 W-555

oo. The WARS rating has been applied to Spanish Peaks in a manner contrary to the stated intent of the WARS Users Manual.

Response:

oo. The same criteria were used in this evaluation as was used during RARE II. The intent, which is to provide an indication of an area's potential for wilderness, has not changed.

Comment: F-343

pp. The Plan should have a "fall-back" management prescription for reduced budgets.

Response:

pp. Reduced budgets will reduce management intensity or quantity, but not management emphasis or philosophy of the preferred alternative.

Comment: F-343

qq. Winter range habitat for deer and elk should not be treated as a single entity, they are different.

Response: qq. Deer and elk habitats have been treated separately throughout the planning process. However, figures were combined in the DEIS. Additional detail is provided in the Final EIS and Forest Plan. See the Wildlife section, Resource Elements, Chapter III of the EIS and Resource Elements section Chapter II of the Plan.

Comment: F-343 rr. Wetlands and wildlife are critical resources and deserve more attention.

Response: rr. Management prescriptions have been improved in the Final Plan and EIS with the addition of a Riparian Management Area Prescription (9A) and more detail of specific management requirements in the wildlife prescriptions, such as Prescriptions 4B and 5B. See Management Direction in Chapter III of the Plan.

Comment: F-343 ss. Wildlife management and research should be an on-going integrated process.

Response: ss. Wildlife management is an on-going activity responsive to research findings. The Plan addresses this concern. See Fish and Wildlife sections under Resource Elements and also under Research Needs, Chapter II and Management Requirements for the Wildlife and Fish Resource in Chapter III, Forest Plan.

Comment: F-343 tt. The DEIS does not explore the consequence of the proposed wildlife management.

Response: tt. The FEIS better displays the consequences of Forest Plan implementation on wildlife resources. See the Fish and Wildlife section under Direct and Indirect Environmental Effects, Chapter IV of the FEIS.

Comment: F-170 uu. The Plan was run through "FORPLAN" only once, and did not include parameters for wildlife management. This computerized modeling system is usually executed several times with changing variables, to optimize utilization.

Response: uu. The resource allocation model "FORPLAN" was used extensively throughout the planning process. Benchmark analysis and the five alternatives considered in detail have been reanalyzed using the FORPLAN model. See Chapter I, FEIS. To ensure wildlife habitat protection and improvement, many constraints were placed on the FORPLAN model. Wildlife values have been included in the price for dispersed recreation.

Habitat improvement for threatened and endangered species and fish were added to the Present Net Value (PNV) analysis outside the model.

Comment: W-671 F-183

vv. Forest Service attempts to involve the public in the Land Use Plan and Wilderness Study Areas has been minimal. This is a serious flaw in the preparation of the EIS. Also, local agencies, governments, counties, and state agencies were not solicited for comments.

Response:

vv. Please see response to comments 3r and 3s in this section.

Comment: W-256

ww. I suspect that a thorough analysis of the Pike and San Isabel Plan would show the following: The dispersed recreation yields are too high, but this high level of achievement is linked to commensurately high levels of timber harvest and road building. The problem with this sort of planning is that it ignores the quality of the dispersed recreation experience.

Response:

ww. Dispersed recreation includes motorized and nonmotorized activities. The development of additional roads in conjunction with timber harvesting will result in creating more favorable conditions for pursuing motorized recreation activities. Within the areas thus affected, the quality of motorized recreation can be expected to improve, and the quality of nonmotorized recreation can be expected to decline in proportion to the intensity of road development and amount of vehicle use. Our planning recognized this effect. The overall intent of the Plan is to insure that an ample amount of land will be available for pursuing both types of activities.

4. FIRE

Comment: F-14

a. Eliminating logging would reduce fire danger.

Response:

a. Some of the highest fuel "build-ups" occur where insects and disease or wind have "harvested" the trees but they remain on the ground.

Comment: F-321

b. Since the forests in Lake County are relatively new stands, eliminate prescribed fire.

Response:

b. Prescribed fire is an efficient vegetation management tool used to open the cones of lodgepole pine to release the seed for a

new crop of trees, to stimulate aspen regeneration, or to improve range condition for livestock or big game. It will continue to be one of the management tools that will be considered, and will be used where project specific environmental analysis indicates that it is appropriate.

Comment: W-50

c. There should be no restrictions on methods, equipment, and transportation necessary to control a fire.

Response:

c. The authority to approve motorized use for emergencies has been delegated to the Forest Supervisor. It is used only as a last resort or where life, health, or safety are threatened and time is critical.

5. RANGE

Comment: W-107 F-155

a. Range conditions should be monitored annually to determine range trend and adjust management appropriately.

Response:

a. Range condition trend can be monitored most effectively over longer time periods. The Forest will monitor 20% of range allotments annually. Problem areas or areas of critical concern, will be inspected more frequently. To prevent overuse, and achieve grazing objectives, utilization is measured annually. Utilization standards are specified in Forest Direction, Chapter III, Forest Plan.

Comment: F-258 W-107 F-14

b. Critical wildlife areas, such as big game winter range and post-calving areas, should not be altered by forage allocation to livestock.

Response:

b. Wildlife habitats will be protected through application of allowable use guides given in Forest Direction. In those management areas which have a wildlife emphasis, resource conflicts would be resolved in favor of wildlife. Conversely, in those management areas having other resource emphasis, resource conflicts would be resolved in favor of the management area resource emphasis.

Comment: W-107

c. Livestock redistribution and permit reductions may be necessary to protect water quality and fish habitat in fragile riparian zones.

Response:

c. Riparian zone values will be protected by

application of direction given in Management Prescription 9A, which has been added to the Final Plan.

Comment: F-264

d. Canada thistle is a serious range problem, and should be eradicated

Response:

d. Specific direction has been added to the Plan regarding noxious weed control. Eradication of noxious weeds such as Canada thistle, is probably impossible, but through a concentrated effort of all landowners in an infested area satisfactory control can be achieved.

Comment: FW-6 F-338

e. Explain compatibility of wilderness and livestock grazing, and the statement "range utilization and recreation activities are of a complimentary nature." (DEIS page 6.)

Response:

e. Livestock grazing is permitted by law in the Wilderness Act of 1964 and the Colorado Wilderness Act of 1980 where such use was established prior to the designaton of the Wilderness. Dispersed recreation use and grazing are usually compatible except in situations of direct competition for space, which has been rarely reported on this Forest.

Grazing and recreational activities are generally not complimentary, and the statement has been deleted.

Comment: F-257 W-107

f. Much of the prairie riparian areas are being abused from over-grazing. Management plans to protect these areas should be included in this Plan. Protect the eastern extension of ponderosa pine.

Response:

f. Prairie riparian areas on the National Grasslands are not being abused. The Riparian Management Prescription 9A, now included in the Plan, provides management direction for riparian resources. See Chapter III, Forest Plan. The eastern extension ponderosa pine on the Comanche National Grassland will be maintained as an integral part of the ecosystem.

Comment: F-257

g. The explanation of intensive grazing as defined and explained in the Plan does not give the public an understanding of what management plans are being considered.

Response: g. The explanation of intensive grazing states that complex livestock management systems are employed. This implies that a variety of management systems such as deferred or rest rotation grazing may be used in any specific management plan for any particular allotment. An allotment management plan that is specific to the problems and opportunities of each allotment is prepared within the framework of the Forest Land Management Plan. The individual allotment management plan determines the management system to be implemented and the range improvements that are needed.

Comment: F-257 h. Has "pitting" been a proved method for increasing forage? The mountain plover numbers are greatly reduced in areas that have been pitted.

Response: h. Pitting in the heavier soils on both the Comanche and Cimarron National Grasslands has proven to reliably increase forage production . We realize that shortgrass prairie is important habitat to some species such as the longbill curlew and the mountain plover, however, the mountain plover prefers open overgrazed areas for resting. The needs of these species are considered prior to implementing a pitting project. The Forest Service is required to maintain habitat to provide for viable populations of all native wildlife species.

Comment: F-257 F-155 i. We cannot find anywhere in the Management Plan that discusses reseeding. Does "seed reproduction" mean "reseeding"? (Management Plan Pages 102-104).

Response: i. Seed reproduction does not mean reseeding. Seed reproduction refers to the range types whose predominant plant species reproduce themselves through seed production rather than through vegetative reproduction. Intensive management practices include reseeding of depleted areas to improve watershed conditions, increase forage production, and improve wildlife cover. Reseeding is also employed in rehabilitation of disturbed areas caused by mineral activities, road construction, timber harvest activities, etc. The species planted depends upon soil type, precipitation level, forage needs, etc.

Comment: F-257 j. We think it would be more cost effective and environmentally favorable to gradually stabilize the Grasslands by reseeding to native grass species.

Response: j. Native species are generally most effective but proven exceptions exist. Some introduced species provide better cover and become established sooner to provide needed ground cover.

Comment: F-257 k. Are there specific contingency management plans for climatic and weather changes such as long or short periods of drought?

Response: k. Contingency plans for range management activities under severe weather changes (as opposed to optimum) are included as part of the grazing permit process which the Forest Service utilizes. Utilization standards are specified in each allotment management plan. Early removal of livestock is required when maximum allowable utilization is reached.

Comment: F-257 F-155 l. The management plan should be specific enough to withstand the pressures from the private sector to increase grazing "when the grazing capacity on private land is low."

Response: l. Range stocking levels are based on range condition and the management system in effect on the allotment. Forest Direction, Chapter III, Forest Plan, specifies the amount of use that can be allowed.

Comment: F-257 F-155 m. Why will range plant associations be maintained in mid-seral ecological status, and what literature source will be used to determine this (Proposed Plan, Page 104)?

Response: m. This direction has been deleted in the Final Plan.

Comment: F-343 n. Current range management practices and range conditions have not been described, so the public cannot ascertain if prescribed management direction in the Plan is sound.

Response: n. Current range management, range condition and prescribed management direction are described in the FEIS.

Comment: F-155 o. Who pays for grazing improvements? Can they be recovered from grazing fees?

Response: o. For National Forests, the Federal Land Policy and Management Act of 1976 established the Range Betterment Fund (RBF). Fifty percent of the grazing fee is authorized for return to the ground for range improvement purposes.

Other appropriated funds are sometimes available also. Much of the range improvement work is accomplished by the ranchers who install improvements at no cost to the government.

The USDA, Forest Service is authorized to require needed conservation practices to be installed by the grazing permittee on National Grasslands. The cost of these required conservation practices may be considered in determining the annual grazing fee. Individual ranchers also contribute labor and materials.

6. MINERALS

Comment: F-305; F-15 FW-8; F-16 F-25; F-215

a. Energy and mineral resources have not received adequate consideration during the planning process.

Response:

a. Revised mineral potential maps have been made a part of the permanent file for the Final Environmental Statement. The use of energy and minerals information has been further explained in Chapters III and IV of the EIS. Existing laws and regulations pertaining to mineral entry under the 1872 Mining Law and leasing under the 1920 Leasing Act allow mining activities on a large percentage of National Forest System lands on the the Pike and San Isabel.

Comment: F-305 F-15 F-16

b. A no-lease decision should be based on a determination that mineral operations "would be irreversible and irretrievable with no potential for reclamation", not the six criteria used.

Response:

b. The criteria are designed to allow determination of where irreversible and irretrievable damage would occur. A site specific analysis of each lease application area will be made on a case-by-case basis. Recommendation for lease denials or withholding of consent will be based on an environmental analysis of the specific area in conjunction with the six criteria established.

Comment: F-305 F-15 F-16 F-215

c. Criteria are subjective and spell out only the justification for prohibiting leasing and gives no guidelines for making decisions favorable for leasing.

Response:

c. The criteria identified for consideration of a recommendation to deny leasing or to deny consent

for leasing are aimed at providing basic guidelines in the environmental analysis process (in areas possessing environmental sensitivity). The criteria will be used in conjunction with a site specific analysis of the lease application area.

Comment: F-305 F-15 F-16

d. The Forest Service is in violation of the Federal Land Policy and Management Act of 1976 by essentially withdrawing land from mineral leasing without going through the proper process.

Response:

Withdrawal from mineral leasing may only be accomplished as provided by section 204 (43 U.S.C. 1714) of the Federal Land Policy and Management Act. The Forest Service may recommend a withdrawal from mineral leasing, but does not have authority to effect a withdrawal. This authority rests with Secretary of the Interior. There is no assurance that a Forest Service recommendation will receive favorable consideration. (FSM 2822.22).

Comment: F-305 F-15 F-16

e. Areas identified as having energy and mineral potential should influence other resource decisions (See NFMA Reg. 219.22).

Response:

e. The mineral resources and mineral impact on other resources is considered in the Plan to the same extent as other resource impacts on the mineral resource. The planning intent is not to preclude uses but to mesh them to any and all extent possible within the capability of the resource base.

Comment: F-305 F-175 F-215 F-15 F-16 F-235

f. In order to comply with NFMA requirements, Forest Service must provide for mineral resource development, keep areas with mineral potential open and accessible and meet minimum legal standards for environmental protection, identify areas where conflicting resource values outweigh potential mineral values.

Response:

f. Only a small percentage of the total acreage of Pike and San Isabel National Forest System lands are withdrawn from mining acitvities under the 1872 Mining Law and/or the 1920 Leasing Act. Withdrawal or segregation of Federal lands from mineral entry and location and leasing is done to maintain other public and/or resource values in the area that outweigh potential mineral values.

The Forest Service does protect the natural environment in all development activities. Management requirements (see Forest Direction, Chapter III, Forest Plan) insure protection for all resource values when any activity occurs. The term "minimum legal standards" is not accurate. The Forest Service identifies expected environmental effects of every activity to be implemented. Mitigation measures to prevent or reduce anticipated adverse environmental effects are designed and required for activities to be implemented. These requirements are specified in operating plans and environmental documents such as environmental assessments and environmental impact statements.

Comment: F-305 F-15 F-215

g. Each alternative should identify detailed management requirements and trade-offs as the alternative relates to energy and mineral values.

Response:

g. All National Forest System lands are available for mineral exploration and development unless specifically precluded by Congress. Site specific stipulations for mitigation measures will be assigned on a case-by-case basis when notices of intent, operating plans, and leases and permits are received. Chapters III and IV of the EIS have been expanded to provide more information regarding energy and minerals.

Comment: F-305; F-16 F-7; F-215 F-25

h. Standard and Special stipulations in Appendix H prohibit or unduly restrict oil and gas activities, thereby circumventing Congressional intent in providing for mineral leasing.

Response·

h. Reasonable site specific stipulations to prevent or control adverse impacts upon surface resources and for reclamation of disturbed National Forest System lands are applied to leases on a case-by-case basis. Selection of stipulations generally depend on the topography, soil sensitivity, and other environmental factors of the area.

Stipulations applied to Forest Service leases do not prohibit oil and gas exploration or development activities. They do insure that environmental effects from oil and gas activities do not permanently harm surface resource values and uses. Restrictions on oil and gas leases, to the extent that they occur, are necessary to protect the environment. Congressional intent is to provide

both mineral production and environmental protection on National Forest System lands.

Comment: F-305; F-215 F-16; F-15 F-25; W-107 F-29

i. This Plan should be modified to show positive aspects of energy and mineral activities rather then dwell on mitigating damage, preventing adverse impacts keep maximum control over mineral leasing activities, etc.

Response:

i. All National Forest System lands are available for mineral exploration and development, including oil, gas, and geothermal, unless specifically precluded by acts of Congress or other forms of formal withdrawal. Mineral resources are considered valuable assets of public land. The Forest Service recognizes the importance of mineral resources to meet U.S. energy demands. Reasonable site specific stipulations for mitigation measures will be assigned on a case-by-case basis as each lease area warrants. Mineral potential maps identifying area of low-moderate-high levels of leasable and locatable minerals were prepared and are a permanent planning record at the Forest Headquarters in Pueblo, Colorado.

Comment: F-301

j. Add criteria for oil and gas leasing to prevent noise from mineral activity from interfering with the wilderness experience and to locate exploratory and development operations where visitors will not see them.

Response:

j. On midnight, December 31, 1983, designated wilderness were withdrawn from leasing under the 1920 Leasing Act. Activities occurring under the 1982 Mining Law will be reviewed and analyzed on a case-by-case basis. All operations will require Forest Service approval to ensure protection of wilderness characteristics, including the visual and audio resources. National Forest System lands recommended for wilderness and further planning are managed so as to protect their wilderness character until final decisions or designations are made.

Comment: F-301

k. There is no description of how the leases will affect the wilderness or other areas of the Forest. How will roads, tanker trucks, drilling rigs, etc., affect water, wildlife, vegetation, soils, and visitor experience to the Forest or wilderness?

Response: k. Designated wilderness was withdrawn from mineral leasing on midnight, December 31, 1983. Applications for operation on other National Forest System lands open to mineral leasing are reviewed on a case-by-case basis. Reasonable site specific stipulations for mitigation measures are assigned as each lease area analysis warrants.

Comment: F-11 F-258 l. Mineral development will destroy the wilderness resource. The preferred alternative should reflect Congress intent to deny leasing (in wilderness).

Response: l. Designated Wilderness were withdrawn from mineral leasing on midnight, December 31, 1983. Mining activities in valid mining claims under the 1872 Mining Law may be allowed only if warranted after an environmental analysis of the area has been made based on a proposed operating plan. National Forest System lands recommended for wilderness and further planning are managed so as to protect the wilderness character until final decisions or designations are made.

Comment: FW-8 L-17 m. Strongly oppose mineral leasing recommendations as disastrous.

Since Congress prohibited expenditure of funds for processing leases in wilderness then leasing in wilderness cannot be considered by the Forest.

There is no need for leasing in wilderness since studies indicate there is only 1-3 percent of potential oil and gas in wilderness. Also 90 percent of areas under lease are never subjected to drilling.

Response: m. Response 6c, 6d and 6g above address this concern. Also, a large percentage of leased acres are never subjected to drilling and development. Leasing laws do not dictate that exploration be confined to areas of known high mineral resources.

Designated Wilderness were withdrawn from mineral leasing on midnight, December 31, 1983.

Comment: FW-8 n. Oppose leasing of wilderness and Wilderness study areas. Controls may be lost because of economics if the area cannot be developed with mitigation stipulations.

Response: n. Designated Wilderness were withdrawn from mineral leasing on midnight, December 31, 1983. Wilderness Study Areas and Further Planning Areas are managed so as to protect their wilderness character until final decisions or designations are made.

Comment: FW-8 o. The Pike-San Isabel National Forest plans to process over 400 mineral applications by 1990. Environmental effects of development should be described in detail.

Response: o. Environmental effects of mining activities are determined on a case-by-case basis. Operating plans for specific mining developments for both locatable and leasable minerals are required and used in the analysis of potential environmental impacts. As warranted by the environmental analysis, site specific stipulations for mitigation measures are applied. When necessary, bonds are required to insure compliance with the reclamation provision of the mining regulations and the operating plans. When operators fail to complete the reclamation work, the Forest Service will use the bond deposit to reclaim the area.

Comment: W-598 p. Do not agree with estimate of mineral potential for Wilderness and Wilderness Study Areas. Consideration should be given to extensive historical mining and identified areas of mineralization in Wilderness Study Area evaluations.

Response: p. Mineral potential maps have been prepared for Wilderness Study Area evaluation. Areas identified by USGS and Bureau of Mines as having potential mineralization and historical data of previous mining activities are a part of the Wilderness Study Area evaluation process.

Comment: W-601 q. Mineral surveys being done by USGS and Bureau of Mines have not been referred to nor have any provisions been made for including then when completed.

Response: q. Mineral survey reports prepared by the U.S. Geological Survey and Bureau of Mines have been incorporated into the Wilderness Study Area report evaluation process. Pending mineral surveys for Wilderness Study Areas if any, will be addressed to the extent possible, with inclusion of mineral survey reports as they become available. Mineral potentials of Wilderness

Study Areas have been addressed in wilderness reviews.

Comment: W-49, F-30, F-15, F-215

r. Oil and gas leasing activities on forest lands can be compatible with other ecological environments if done with proper controls, even in Wilderness Study Areas. Erosion and water quality hazards can be controlled if recently developed drilling technology is used. It would reduce the number of sites, and permit extraction beneath Wilderness Areas without surface entry.

Response:

r. Designated wildernesses were withdrawn from mineral leasing and entry on midnight, December 31, 1983. All remaining National Forest System lands are available for mineral exploration and development unless specifically precluded by Congress. Site specific stipulations for mitigation measures will be assigned on a case-by-case basis when notices of intent, operating plans and leases and permits are received. Wilderness Study Areas and Further Planning Areas are managed so as to protect the wilderness character until final decision or designations are made.

Comment: W-455, F-257, W-107

s. Guidelines are needed to regulate mining, prospecting, access rights-of-way and installations of pipelines. Need to build good protective stipulations into new leases and operating plans.

Response:

s. The Mining Law of 1872 and 36 CFR 228 Subpart A provide guidelines, for exploration and development of hardrock minerals (vein and placer deposits), including access rights-of-ways. Installation of pipelines is governed by the Mineral Leasing Act of 1920, as amended.

Site specific stipulation for mitigation measures will be assigned on a case-by-case basis for both locatable and leasable mineral activities. Operating plans for mining activities on National Forest System lands are required from operators when significant surface disturbance is anticipated. Such plans describe and address types and method of operation, proposed roads or access routes, and other development such as installation of pipes. Expected environmental impacts to the area by proposed operations are assessed. A reclamation plan and bond is required as necessary to ensure satisfactory reclamation of disturbed areas.

Comment: W-25

t. Mining often makes lands unsuitable for multiple use.

Response:

t. All National Forest System lands are available for mineral exploration and/or development, unless specifically precluded by acts of Congress or other forms of formal withdrawal. As directed by the Organic Act of 1897 and the Multiple Use-Sustained Yield Act of 1960, National Forest System lands are managed for multiple use of natural resources. Mining and related activities on National Forest System lands are governed by specific laws that identify procedures and conditions under which prospecting, exploration and development of minerals can be carried out. All lands are evaluated for activity suitability. Appropriate stipulations are applied as necessary to prevent and control surface resource damage. Bonds are required to insure that adequate reclamation is accomplished.

Comment: F-303

u. Stipulations for oil and gas leasing do not sufficiently protect wildlife resources.

Response:

u. Wildlife protection is given appropriate consideration as necessary in all lease proposals. Calving and nesting areas and other critical wildlife habitats are protected with Limited Surface Use Stipulations, FS, R-2 Supp. C to Form 3109-3, refer to Appendix F, of the Forest Plan.

Comment: F-305

v. Existence of threatened and endangered species is not a legal basis for denying leasing opportunities.

Response:

v. Existence of T&E species is considered in the environmental analysis of a lease application area. A limited surface use stipulation (R-2 Supp. C to Form 3109-3) allows for protection of the habitat but does not necessarily require denial of the lease for such area.

Comment: W-107

w. Seismic blasts for mineral exploration have caused negative environmental impacts including forest fires.

Response:

w. Operating plans require stipulations for protection of the surface environment.

Fire protection and safety are considered and operations are monitored periodically to insure compliance with mining regulations.

7. RECREATION

Comment: F-301; FW-5 W-107; F-315 F-120; F-73 F-289; FW-8 F-301; F-279 F-217; F-123 F-66; F-27 F-67

a. Outdoor recreation is of primary concern on the Pike and San Isabel and needs to be emphasized in the Forest Plan. Opportunities for all users - hiking, camping, handicapped, motorized, nonmotorized, etc., needs to be included.

Response:

a. Demand is increasing for all types of recreation opportunities and experiences. The objective for recreation management in the Forest Plan is to provide a balance that satisfies the demand while minimizing conflicts among users and resources.

Comment: F-268; W-90 FW-5; W-448 F-12;

b. Concern is expressed that recreation values and opportunities are being exploited at the expense of providing commodity opportunities.

Response:

b. The Plan evaluated commodity interests against other demands for the available land base. The Plan provides a combination of uses to meet the variety of interests and resource demands.

Comment: F-283 F-73 W-107

c. Continue to construct and maintain developed site recreation facilities.

Response:

c. The Forest will continue to construct and maintain facilities and sites that are cost effective and provide a needed recreation experience.

Comment: FW-6 FW-8 F-261

d. Manage wilderness values in areas adjacent to designated wilderness and Wilderness Study Areas to preserve that natural environment.

Response:

d. Lands adjacent to Wilderness and Wilderness Study Areas will be managed in accordance with the applied management area prescriptions. The "buffer" concept will not be applied.

However, activities within the management areas will be planned and conducted in a manner that is sensitive to possible impacts on the Wilderness and Wilderness Study Areas.

Comment: W-107 F-255

e. Concern is expressed that existing ski areas should be expanded to capacity.

Response:

e. Opportunities for ski area expansion is provided in the Forest Plan based on available information concerning the area, capacity, economics and the potential for increased capacity.

Comment: F-14

f. It should be possible to force an access across private land for people to reach the National Forest.

Response:

f. Each proposed right-of-way is subject to an environmental analysis which considers alternative routes, resource needs, and public access needs. When and where sufficient demand occurs, condemnation can be used.

Comment: F-150; F-243 F-190; F-68 F-146; F-84 F-249; F-80 F-250; F-79 F-71; F-81 F-66; F-82 F-223; F-78 F-76; F-119 F-74; F-113 F-72; F-90 W-565; F-83 F-85; F-67 F-251; F-88 F-87

g. Concern is expressed about closing roads and trails to four-wheel drive users. Four-wheeling affords recreation opportunities for certain people who would otherwise not have the chance to see National Forest back country. These people being the elderly, physically handicapped, disabled, etc. Organized four-wheel drive clubs help to maintain roads for the Forest Service and are willing to do more.

Response:

g. The objective is to provide a range and balance of recreation opportunities and experiences. All open or all closed areas are not viable options. Management plans that may result in closing of some roads will be developed with involvement from individuals and clubs whose concern is four-wheeling opportunities along with input from other special interests.

Comment: F-70

h. Concerned that the Continental Divide National Scenic Trail corridor be protected from timber

sales and road construction until final trail location is designated.

Response: h. The Continental Divide National Scenic Trail study designated a corridor of up to 50 miles in width for the proposed trail location. A route of 2-5 miles or a trail tread have been located on the Pike and San Isabel National Forests. In these areas where a tread has not been determined, the route will be protected to retain all options. Local input will be solicited in determining final tread location.

Comment: FW-6 i. Greenhorn trail will not require reconstruction by 1988 and we will not tolerate major relocation of the trail.

Response: i. Approximately 1.8 miles of actual reconstruction over the entire 3.5 miles and ¼ mile of relocation is all that will be necessary. This is an excellent trail that has not been properly maintained and as a result needs work. Funding may defer work beyond 1988.

Comment: F-231; F-112 F-290; F-30 F-94; W-107 F-18; F-248 F-155; F-216 j. Concern about controls and regulations of off-road vehicles, their noise and other activities that directly impact wildlife, scenery and the environment.

Response: j. In providing a range of recreation opportunities, some areas have been established where the use of trail bikes is appropriate and the impacts on the resources and other values is minimal. The number and size of the areas for trail bike use has been restricted so other users should be cognizant of this activity when using the areas.

Comment: FW-1; W-22 F-94; F-301 W-206 k. Too much emphasis is placed on motorized use. We do not want more 4-wheel drive roads or expansion of present off-road vehicle areas. Four-wheel drive vehicles assault clean air, land, water and wildlife.

Response: k. The intent is to provide a balance and a range of recreation opportunities and experiences. The addition of new areas or expansion of existing areas will be carefully determined based on need. Public input and potential for negative impacts on user experience, wildlife and other resources.

8. RESEARCH NATURAL AREAS

Comment: F-257 — a. More attention should be given to natural and historic areas in the Plan.

Response: a. The Research Natural Areas section has been clarified as to Forest Service intent of classifying areas as Research Natural Areas, Historic Areas, Scenic and Special Interest Areas. This section has also been expanded to include more areas for study. See Research Needs, Chapter II, Forest Plan.

Comment: F-257 — b Scenic River analysis is vague. More detail is needed.

Response: b. The study was only a preliminary evaluation to determine if detailed studies are warranted. This study is available as part of the planning record Also, see the section on National Wild and Scenic Rivers, Chapter II, Forest Plan and Appendix F, this document.

Comment: F-257 — c. Spanish Peaks should be managed for its geologic spendor.

Response: c Spanish Peaks have been recommended as a National Natural Landmark and are managed to protect their geologic features. See the section, Resource Elements, Chapter II, Forest Plan.

Comment: F-257 — d. Need research areas (Management Area 10A) representing all major communities and a wide variety of subcommunities. Areas should be large enough for comparative studies.

Response: d. The intent of Research Natural Areas is to eventually protect areas in every major ecosystem. These areas will not be subject to comparative management studies. Rather, they will be protected for study in a natural condition. Experimental Forests and Grassland areas are set aside to study effects of different management activities. Prescription 10B provides for this type of research.

Comment: W-107 — e. The memorandum of understanding between the Regional Forester and the Colorado Natural Areas Program (Department of Natural Resources) should be considered in Forest Plans and in the identification, evaluation and protection of qualified natural areas on USFS lands in Colorado.

Special attention should be given to all natural areas designated by the Colorado Natural Areas Program (1981). Of particular importance at this time are:

- two sites on Hoosier Ridge possessing special and exemplary plant communities;
- the five existing RNAs on Colorado USFS land that are already designated state RNAs and Special Interest Areas;
- RNA candidates proposed by the Colorado Natural Areas Program or the USFS Rocky Mountain Forest and Range Experiment Station.

Response: e. The role of the Colorado Natural Areas Program (CNAP) and the cooperative relationship between the CNAP and the Forest Service in identifying and protecting potential Research Natural Areas has been explained in more detail in this Final Environmental Impact Statement. See the Recreation section, Chapter III, in the FEIS and Resource Elements, Chapter II, Forest Plan. Additionally, other potential Research Natural Area sites have been identified. The Nature Conservancy has purchased private lands on Hoosier Ridge to assure protection for rare plant communities.

Comment: F-197 f. Should declassify Abyss Lake and Lost Creek scenic areas since they are now in wilderness.

Response f. Lost Creek and Abyss Lake Scenic Areas have been declassified as scenic areas since they are now within designated wilderness. See the section, THE NEED TO ESTABLISH OR CHANGE MANAGEMENT DIRECTION, Chapter II, Forest Plan.

Comment: F-197 g. Windy Ridge should be reclassified as a research natural area because of its unique stands of bristlecone pine.

Response: g. This area is an outstanding scenic area. It does include bristlecone pine, however, areas having bristlecone pine are already preserved for study and therefore this area is not needed for that purpose.

Comment: F-197 W-107 h. The Special Land Classification section of the Proposed Plan does not mention the Research Natural Areas or the Experimental Forests. We urge USFS to consider all RNA proposals

recieved from citizen groups, the State of Colorado Natural Areas Program, and the USFS research staff.

Response: h. These areas are specifically addressed under Management Area Prescriptions 10A and 10B respectively. The Forest Service considers all proposals received for Research Natural Areas and evaluates their potential value and characteristics to determine suitability, as well as need, for classification and protection. Discussions of special land classifications have been expanded in the Plan. See the Resource Elements section, Chapter II and Management Area Prescriptions, Chapter III, Forest Plan.

Comment: F-197 i. Since the Fremont Experimental Forest is no longer active, the withdrawal should be revoked.

Response: i. The Fremont Experimental Forest has been disestablished. See the section, THE NEED TO ESTABLISH OR CHANGE MANAGEMENT DIRECTION, Chapter II, Forest Plan.

9. TIMBER

Comment: F-279 F-330 F-264 W-465 a. The Forest lands need to be managed. This includes tree cutting. Other benefits from tree harvesting include improved wildlife habitat, insect and disease control, use of inferior trees, and revenue from wood products. The harvest levels must not be so high as to destroy natural beauty.

Response: a. Managed forests contribute the most public net benefits. Planned vegetation management is designed to benefit all resources including natural beauty.

The needs for vegetation management have been expanded in the Resource Elements section of Chapter III and in the Direct and Indirect Environmental Effects section of Chapter IV of the EIS. These sections provide a more complete explanation of other resource benefits.

Comment: F-155 b. Timber cuts are staged under the pretense of increasing winter wildlife range. Timber harvest would not be an improvement for a goshawk.

Response: b. The standards and guidelines in the Forest Plan are intended to insure that at least minimum resource objectives are always met.

Management Direction requires adequate amounts of cover for management indicator species, including deer and elk. Goshawk habitat will also be protected. Tree cutting can be an effective means to improve habitat for goshawk prey species as well as winter range for deer and elk.

See the Management Requirements section in Chapter III, Forest Plan.

Comment: F-313, F-136, F-174

c. Clearcutting will disrupt big game herds. Human disturbance could have a disastrous effect Other species need standing dead trees for nesting.

Response:

c. Studies have shown that elk frequently move to a neighboring drainage during logging activities but soon return when activity ceases. Specific guidelines in the Forest Direction and Forest Management Prescriptions have been developed to assure that snags (dead trees) are left after harvest operations for nesting species. See Management Requirements and Management Area Prescriptions 4B and 5B in Chapter III of the Forest Plan.

Comment: F-278, F-257

d. The balance of even and uneven management will favor horizontal diversity at the expense of vertical diversity.

Response:

d. The majority of the Forest will not be harvested. Many of these areas are expected to evolve to uneven-aged conditions providing a balanced diversity that in total will provide a diversity of wildlife habitats.

Comment: W-107

e. Insect and disease outbreaks should be dealt with, without using pesticides. Use Integrated Pest Management.

Response:

e. The Plan has been revised to reflect the principles of Integrated Pest Management. Management outside of wilderness favors a healthy, vigorous Forest.

Comment: F-278, F-174

f. The proposed level of timber harvest in Lake County will adversely affect wildlife and rare and endangered wildflowers, such as the calypso orchid.

Response: f. We have reviewed plans for timber harvesting on the Leadville Ranger District and agree that proportionate to the areas available for harvest, proposed levels were too high. The annual harvest has been revised from an average of 4.10 MMBF to 1.80 MMBF. Rare and endangered plants will be protected.

Comment: F-274 g. The large mileage of road construction will detrimentally effect vegetation, wildlife, and promote erosion.

Response: g. New roads when constructed will be managed according to the management area prescription. Roads in areas of special concern for wildlife can be closed to public use. Standards and guidelines in the prescriptions are designed to mitigate adverse impacts such as erosion.

Comment: F-321; F-234 F-278; F-136 F-281; F-297 F-242; F-232 F-279 h. The increased timber cutting in Lake County will unacceptably effect scenic beauty. Clearcutting will be detrimental to disp sed recreation natural beauty and wildlife.

Response: h. The average annual harvest level proposed for Lake County has been reduced. Management areas for dispersed recreation have been added to this area. The vegetation management in these areas will be designed to enhance esthetics. The standards and guidelines for vegetation treatments are designed to provide for long term enhancement of scenic beauty.

Comment: F-292; F-277 F-310; F-254 F-311; F-319 F-178; F-291 F-329; F-282 F-309; F-174 F-204; F-325 F-322; F-328 F-184; F-273 F-232; F-326 F-160; F-262 F-242; L-14 F-126; L-10 F-132; F-297 F-142; F-279 F-136; F-234 F-280 i. Proposed harvest levels for Lake County are too high because it will adversely affect natural beauty, wildlife and wilderness, recreation and water quality. Recovery is slow at high altitudes.

The land base in Lake County will not support the proposed harvest levels.

Clearcutting is opposed because of esthetics and regeneration problems.

Response: i. Proposed harvest levels on the Leadville Ranger District have been reduced by approximately 50 percent. Also, water yield management areas have been changed to dispersed recreation areas with prescriptions that will sustain or enhance natural beauty, recreation opportunities, and water quality.

Comment: F-301 j. Regeneration standards (300 stems, 3 inches high) do not assure a new stand. Natural regeneration is difficult in this Region.

Response: j. At maturity, managed tree stands have 75-120 stems per acre before regeneration cutting commences. Therefore, 300 surviving trees per acre will assure a fully stocked, mature stand.

Comment: F-278 F-321 k. Tree growth is slow and difficult to obtain especially at high elevations such as Leadville. The EIS does not address longer regeneration times.

Response: k. Cutting unit size on high elevation sites considers improvement of harsh site conditions to assure prompt reforestation. Units are smaller and slash treatment is modified so that natural or planted seedlings are protected. A normal rotation for the spruce/fir type is 120 years; the Plan allows rotations as long as 180 years to compensate for poor growing conditions at high elevations.

Comment: F-313 l. Needless disruption of plant and animal communities will cause erosion problems. It will take 60 to 75 years to revegetate clear cut areas with mature timber.

Response: l. Forests in the Rocky Mountains will not regain maturity in less than 60 years, regardless of the way they are harvested. If the timber resource is to be renewed by man, rather than by insects, disease, wind, wildfire, and other natural forces, then a period of 100 years or more to produce a new, mature forest will be required.

Comment: F-308 m. Cutting that causes the need for planting is not justified. Uneven-age management and natural regeneration makes more sense.

Response: m The option of regenerating a stand naturally or artificially (planting) depends on site conditions. Planting will not be prescribed unless natural regeneration is unsuccessful.

Comment: F-30

n. Revegetation should not be handicapped by permitting ORVs after cutting.

Response:

n. The Plan provides for road and trail closures to protect resources including closure of areas to motorized vehicles.

Comment: F-14; F-136 F-257; F-258 FW-3; F-174 W-233; F-133 F-201

o. Timber production on the Pike and San Isabel is not economical. Wood production is slow and the environmental impacts are severe.

Response:

o. When considering the economic return from the wood fiber alone, in timber production, then timber harvest on the Forest is not economical. The benefits received from a more healthy, disease free, esthetically pleasing Forest outweigh the cost of timber production. Timber growth is slow, that is true, however, timber harvests on the Forest have been determined on a sustained yield basis. Anticipated adverse environmental impacts from timber harvest activities will be prevented or mitigated. See Management Requirements section, Chapter III, Forest Plan.

Comment: F-66 F-232 F-68

p. Timber cutting and mining are damaging and should not be allowed.

Response:

p. Management of the timber resource is one of the purposes for which National Forests were established. Proper management of the trees is a major benefit to other resources such as wildlife, water, range, esthetics and helps maintain a healthy Forest.

Mining on public lands is authorized by the Mining Act of 1872. The Forest Service reviews operating plans for mineral exploration and development and requires operations to be conducted to mitigate potential environmental damage.

Comment: W-107

q. Departures from sustained yield are not justified because of the minor role of timber production in Colorado and its negative environmental impacts.

Response: q. The Land Management Plan does not propose to depart from sustained yield. All timber harvest areas have specific mitigation to assure negative short term impacts are within acceptable limits.

Comment: W-23 W-24 r. The responsibility of National Forest management should be to preserve natural resources rather than develop or exploit them.

Response: r. Wise use of natural resources is written into the legislation which authorized the National Forests. Some areas are preserved for both recreation and study. Such areas include wilderness and research natural areas.

Comment: F-154 W-448 s. Timber should not be harvested especially if it involves clear cutting or commercial thinning.

Response: s. When the National Forests were established, proper management of the vegetation was one of the reasons for establishment. Commercial timber harvest is one of the efficient methods of managing the vegetation. Research has shown that clearcutting is the best method of regenerating aspen and lodgepole pine.

Comment: W-411; F-336 F-331; F-324 F-301; W-418 F-258; FW-2 F-126; F-332 F-222; W-576 F-280 t. The Plan calls for harvesting too much timber. Vegetative treatments planned will adversely affect natural beauty, wildlife habitat, and cause erosion.

Response: t. The harvest level proposed is to assure long term sustained yield and a healthy, vigorous forest. Planned vegetation treatments are designed to provide vegetative diversity and enhance wildlife habitat, provide for increased water yields, insure perpetuation of aspen for wildlife and scenic beauty, and reduce susceptibility of forests to devastating insect and disease attacks. Standards and guidelines are established to insure all resource values are coordinated and potential adverse effects are mitigated.

Comment: W-460 u. Opposed to the extent of increase in timber harvest. It will cause damage to natural beauty and involves

F-253
F-262
F-297

clearcutting which involves a long recovery time. Is it justified by demand?

Response: u. The proposed harvest level is one that assures long-term sustained yield. Clearcutting is used with species that respond best to clearcutting or to improve water yield and diversity. The demand for wood in FY 82 was about 30 MMBF (18 MMBF sold and 12 MMBF given free).

Comment:
FW-7
W-449
F-333
F-308
W-602

v. The proposed timber harvest is too large. It is uneconomical, involves too many roads, is irresponsible, and will cause erosion

Response: v. The harvest level proposed is to assure long-term sustained yield and a healthy, vigorous Forest. Appropriate standards and guidelines are designed to mitigate potential adverse impacts. Harvesting trees is economical when consideration is given to benefits obtained for other resource values such as wildlife diversity, water yield, and insect and disease control.

Comment:
F-184; F-282
F-277; F-274
F-281; F-335
F-248; F-55

w. Clearcutting and proposed water yield increases will increase erosion, siltation, and deteriorate water quality with heavy metals. Clearcutting also promotes spring flooding.

Response: w. Colorado and the nation needs more water. The Arkansas River Basin Cooperative Study Report shows that irrigation requirements exceed the available water by 490,000 acre feet. The National Forests can contribute some additional water. The Plan proposes a very modest increase in water yield.

Standards and guidelines in Chapter III of the Forest Plan require that we do not degrade water quality or damage stream channels in the process of increasing water yield.

For example General Direction in Chapter III of the Forest Plan: "Schedule increased water yields within fourth order watersheds to prevent excessive channel scouring and associated sediment yield increases."

Comment: x. Timber harvest should not occur in riparian areas,

W-107
F-258

except for human safety or insect and disease control.

Response: x. Management Prescription 9A has been added to Chapter III of the Forest Plan which specifies management practices in these sensitive areas. Most timber harvest will be by selection cutting which has least impacts on soils and water quality.

Comment:
F-335
F-248
F-278

y. The proposed timber harvest increase will be detrimental to outdoor recreation and the economy, especially in the Leadville area.

Response: y. The harvest plans for the Leadville area have been reduced. Where timber cutting does occur, the impacts on natural beauty are considered and mitigation measures applied to avoid adverse impacts.

Comment:
F-307
F-258
FW-6
W-107

z. Timber stands should be managed in uneven-aged conditions. This will promote diversity and reduce need for artificial regeneration. There is too much emphasis on clearcutting and standards and guidelines are too vague. Regeneration is not always successful.

Response: z. Where clearcutting is used the size, shape, and arrangement of the clearcut units will be varied to meet the management objectives for the particular area. Much of the Forest will not be harvested. We expect many of these stands to evolve toward uneven-aged conditions.

We have revised the cutting methods (Standards and Guidelines) to be used throughout the Plan and reduced the amount of clearcutting planned. See Management Requirements section and Management Area Prescriptions sections, Chapter III, Forest Plan.

Comment:
W-107

aa. Make specific recommendations regarding silviculture systems to be used for different tree species.

Response: aa. The selection of the "best" cutting methods is complex. Many factors are involved:

The ecological requirements of the species;
The economics of management and harvesting; and
Other land management objectives, such as:
- water yield
- horizontal and vertical diversity
- natural beauty

Silvicultural methods were selected which analysis showed best meet management goals and objectives. These silvicultural methods and practices are shown in the Forest Direction section and the Management Area Prescription Chapter III, Forest Plan.

Comment: F-259

bb. Cutting in spruce/fir will require at least a 150 year rotation age.

Response:

bb. The Forest used a 120 year rotation age in the analysis plus 20 years for regeneration which totals 140 years.

Comment: F-43; F-301 F-311; F-262 F-281; W-431 W-483; F-325 F-313; W-206 W-404; F-331

cc. Clearcutting is not acceptable, especially large clearcuts. There is concern for stream erosion, effects on plant and animal ecosystems, and scenic scars.

Response:

cc. Some species reproduce best with clearcut methods. Aspen and lodgepole pine are examples. In spruce/fir timber areas, clearcutting is used to promote water yield, horizontal vegetative diversity, and to avoid windthrow problems. Clearcuts may be as small as one acre. In spruce/fir areas the emphasis will be on smaller clearcuts. In lodgepole pine and aspen, clearcuts may be larger; but both species tend to regenerate quickly with a new crop.

Comment: W-107

dd. The following standards are proposed for clearcuts which should be used only in aspen and lodgepole pine:

- less than 5 acres in size and 300 feet wide
- use irregular shapes
- permit firewood use, then close roads
- protect snags

Response:

dd. Where clearcutting is used the size, shape, and arrangement of the clearcut units will be varied to meet the management objectives for the particular area. General Forest direction is to create openings with a Patton edge-shape index of at least 1.4, which will assure irregular edges. We agree that firewood use is a good way to reduce slash and most new roads will be closed following use. The Plan provides for snag protection. See Aspen Management Prescription 4D in Chapter III, of the Forest Plan.

Comment: W-107

ee. Timber harvest is low priority in Colorado and constitutes a subsidy.

"The Forest Service should cease administering deficit sales."

Investments should focus on productive sites with good access and which will regenerate naturally.

Response:

ee. Timber harvest is important to maintenance of a healthy Forest and improvement of other resources such as wildlife, esthetics, and water yield. Timber harvest is an efficient method of accomplishing needed vegetation management.

Constraining timber management to highly productive sites with existing access fails to recognize that our proposed program is designed to benefit other resources. Stands needing treatment to improve wildlife habitat, water yields, or livestock forage may not be highly productive or readily accessible.

Comment: FW-8

ff. The plan proposes timber cuts which are too high because:

- It includes lands which are too steep.
- Board foot/Cubic foot conversion factors should be looked at.
- New stands growth projection is too optimistic; investments are uneconomic and understocked acres are increasing.
- The definition of Commercial Forest Land being used, (20 cubic feet/acre/year) is too low.
- Road building will cause deficit sales.

Response:

ff. Lands of 45% slope or less can be harvested with crawler tractors and light flotation skidders, both of which are currently available.

We have made intensive studies of our BF/CF (Board foot/cubic foot) ratios and have revised them. These revisions are reflected in Appendices A, B and C of the Plan.

Inventory and evaluation standard procedures were used to estimate growth and potential

future yields for this Forest. Estimates also include silvicultural practices and improvements such as precommercial thining, genetic improvements, site preparation, and planting Planting all cut areas was not assumed when computing regenerated yield. More intensive sampling and changed definitions created "apparent" increase in nonstocked acres rather than timber harvesting. In other words, the nonstocked acres existed at the time of the last inventory but were not identified due to the less intensive inventory requirements.

Twenty cubic feet/acre/year was a nationwide productivity standard when the Plan was developed The revised NFMA Regulations (Federal Register of 9/30/82) have deleted any productivity standard. For this Forest Plan, for this planning period, lands which could not produce 20 CF/AC/Yr were classed as unsuitable for timber production because these acres are uneconomic to manage for timber production.

When comparing direct costs of timber management (including road costs in support of timber) with timber revenues, it is true that timber harvesting is a deficit practice. However, when considering the benefits accrued to other resources (increased forage, improved wildlife habitat diversity and increased water yields) the proposed alternative has a benefit/cost ratio of 2.1:1 at 4 percent interest. This means that $2.10 in benefits is returned for each dollar expended.

Comment: F-280

gg. Timber cutting, especially clearcutting, will have an adverse effect on cross country skiing and increase the fire hazard.

Response:

gg. Development of further access into an area will improve the cross country trail system. Slash abatement standards preclude maintaining a hazard buildup.

Comment: FW-8

hh. Timber production is uneconomical, it returns only 8 cents on the dollar. Seems the Forest policy outlined in the Plan may be violating NFMA regulations.

Response:

hh. When comparing direct costs of timber management (including road costs in support of timber) with timber revenues, it is true that timber harvesting

is a deficit practice. However, when considering the benefits accrued to other resources (increased forage, improved wildlife habitat diversity, increased water yields, etc.), the proposed alternative is considered to be the proper course of action and is in compliance with NFMA regulations.

NFMA regulations also require that Forest Plans provide goods and services in a way that maximizes long-term net public benefits (CFR219.1(a)). These goods and services include much more than just timber, even though vegetation modification is required to obtain some benefits (water yields, increased forage, etc)

Comment: FW-8

ii. The proposed level of timber production exceeds demand and ignores legal requirements for economic efficiency.

Response:

ii. The installed mill capacity for sawmills is only part of the story In 1983, more fiber was harvested as fuelwood than sawlogs. Both the Plan and EIS emphasize that a significant percentage of the proposed timber program will be purchased and used as fuelwood by commercial operators and individuals. When this significant firewood demand is considered, the proposed timber program does not exceed demand and may actually become limiting by the end of the first decade.

Comment: F-308

jj. Need an aggressive program to establish and maintain a forest products industry that will benefit local economies.

Response:

jj. The Forest Service can promote establishment of forest products industries only by offering an adequate and steady (consistent) supply of Forest products. As National Forests' offerings stabilize, industries will develop to utilize these offerings, if a demand for wood products exists in the area. Local economies will benefit from direct and indirect employment associated with these industries.

Comment: F-338

kk. The NFMA requires lands economically suited for timber production be the timber base. Lands where costs exceed returns should be unsuitable. The suitability analysis did not eliminate economically unsuitable lands.

Response:

kk. 36 CFR 219.14(c)(3) states that lands shall be identified as not appropriate for timber production if they are not cost efficient, over the

planning horizon, in meeting Forest objectives, which include timber production. The Forest Plan has made lands economically suited for timber production as the timber base. When comparing direct costs of timber management (including road costs in support of timber) with timber revenues, it is true that timber harvesting is a deficit practice. However, when considering the benefits accrued to other resources (increased forage, improved wildlife habitat diversity, increased water yields, etc.) along with other planned activities, the proposed alternative as a whole, has a benefit/cost ratio of 2.1:1. This means that $2.10 in benefits is returned for each dollar expended. Therefore, lands allocated to the proposed alternative are cost efficient in meeting Forest objectives.

Comment: FW-7 F-123

11. The Pike and San Isabel National Forests being close to population centers are more suitable for recreation and wilderness than logging. The Plan includes areas with too much rugged terrain which is expensive to log. The DEIS assumes average growth rates which are too optimistic. Projected outputs exceed demand and must be subsidized.

Response:

11. The proximity of the Forest to Front Range populations results in a high demand for recreation and timber products, particularly fuelwood, Christmas trees, posts and poles, and other specialty products. Interdisciplinary project planning assures that land areas can provide recreation, natural beauty and timber products simultaneously in harmony.

Timber on slopes up to 45 percent can be logged by tractors or light flotation skidders with minimal impact. Slopes over 45 percent require cable systems or other technology not currently available on the Forest.

The variance between sites of differing productivity was recognized in the Plan. All silvicultural standards include three productivity classes (high, medium, and low) for each Forest type. Yields were different for each of these productivity classes.

Sawlog demand is expected to remain relatively stable, however increases in demand are projected for fuelwood. This results in the proposed outputs being feasible regardless of sawtimber demand increases.

Comment: F-303

mm. The economic analysis of timber production is inadequate.

Response:

mm. A new timber value analysis was done on the Pike and San Isabel National Forests which included bid prices from the recent commercial wood market. This study is part of the planning records and is available for review at the Forest Supervisors Office, Pueblo. The economic analysis for the Plan and alternatives was done in accordance with NFMA regulations. Timber values were estimated prior to development of alternatives. Economics of alternatives included costs and values of timber, range, wilderness, recreation, wildlife, and water resources.

Comment: F-307

nn. Timber yield should be held to 20-25 MMBF/year.

Response:

nn. Analysis has shown that the Forest can sustain an annual harvest of 133 million board feet. The proposed program is far less than that and has a positive economic return when other resource benefits are considered.

Comment: F-303

oo. Timber values are based on historical data and hence overstated. The economic analysis of timber production is inadequate.

Response:

oo. Timber values were calculated using recent historical data. These values have been maintained or increased up to the present. Competition between sawtimber and fuelwood operators has maintained a relatively high price level for fiber offerings on this Forest.

Comment: F-303

pp. Prices for timber do not adjust for changes in long-term market prices.

Response:

pp. Forest prices are not adjusted for long-term market price fluctuations. Long-term market fluctuations are difficult to assess and would not contribute significantly to a comparative analysis.

Comment: F-303

qq. The discount rate is important. The rate used in the analysis is too low.

Response:

qq. Analyses were made using 4 percent and 7-1/8 percent discount rates. These rates were prescribed nationwide for use in economic analyses.

Comment: F-303

rr. Sensitivity analyses should be conducted for different discount rates and a re-analysis made.

Response:

rr. Sensitivity analyses involving 4 percent and 7-1/8 percent discount rates were conducted. (See Comparison of Alternatives and Environmental Consequences, Chapter II of the FEIS.

Comment: F-303

ss. An explanation should be made on how costs and benefits of non-commercial outputs were arrived at.

Response:

ss. An explanation of how resource values were computed is provided in the section on Economic Effects, Chapter IV of the EIS.

Comment: F-258

tt. The objectives of management of unproductive stands needs to be clearly spelled out.

Response:

tt. The objectives for managing unproductive stands are dictated by the management area in which they are located. Specific direction for management of unproductive stands is shown under Management Requirements, Chapter III, of the Forest Plan.

Comment: F-338

uu. The increase of understocked lands is evidence that lands incapable of regeneration have been harvested.

Response:

uu. We have examined the data which showed understocking and find two situations:

- The previous inventory had too few samples to adequately sample this strata of land.
- Nearly all unstocked areas occur outside of areas harvested in the last 20 years.

Comment: F-338 F-257

vv. Timber harvest guidelines are vague. (Especially for unproductive stands).

Response:

vv. Unproductive lands were those which produced less than 20 cubic feet per acre per year. Many pinyon-juniper woodlands fall in this category. This does not preclude vegetation management. But these lands are not expected to contribute to the long term sustained yield.

Comment: F-307

ww. Many of the adverse impacts of increased harvest levels have been undocumented or ignored.

Response:

ww. Possible adverse impacts are addressed in the section on Adverse Environmental Effects Which Cannot be Avoided in Chapter IV of the EIS.

This chapter has been expanded to provide more information regarding anticipated impacts.

Comment: F-279 FW-7

xx. With the proposed harvest levels of the Plan, amenity values will suffer.

Response:

xx. Vegetation management activities are designed to benefit other resources including esthetics and wildlife, especially over the long-term.

Comment: W-616

yy. Practice intensive silviculture on areas developed with roads.

Response:

yy A harvest level that meets demand will require additional access. Most new roads will be closed following use.

Comment: F-234; FW-8 F-328; F-292 FW-1; F-301 F-155; F-324

zz. Areas should be kept available so that private individuals can cut fuelwood.

Should the Forest supply fuelwood to the Front Range cities at the expense of local communities? Is there a fee for fuelwood?

The Plan and DEIS should provide more information.

Response:

zz. Each year the Forest provides a substantial number of fuelwood cutting areas for family use. There is a permit and fee system in use. The Plan does not envision changing this policy.

All citizens must have an opportunity to purchase fuelwood on public lands and it must be equally available.

Management Area Prescription 7D has been added to the Plan where fuelwood production will be emphasized.

Comment: W-107

aaa. The Regional Guide documents a ten fold increase in fuelwood use since 1973. The following should be considered:

- Supply capabilities on sustained basis.
- Demand forecasts.
- Favor citizens with low or fixed incomes.
- No deficit sales.

Response:

aaa. The proposed supply of fuelwood is considered in analysis of the long term sustained yield (Some additional wood can be made available from unregulated areas or products). Fuelwood is made available to all equitably. Commercial sales are at not less than fair market value.

Comment: F-343

bbb. Negative impacts of timber stand management should be covered more thoroughly.

Response:

bbb. The negative aspects of timber harvesting are mostly short-term. Standards and guidelines in the Management Area Prescriptions of the Plan are specifically designed to minimize expected negative aspects.

Comment: W-5

ccc. Timber companies should use more private timber and less National Forest timber.

Response:

ccc. It is interesting to observe that as National Forests have begun to charge fair market value for products such as fuelwood, it has served as a stimulus to managing of small private forested lands.

Comment: F-278

ddd. Human activity in the Mt. Zion area should be reduced rather than increased to promote wildlife and dispersed recreation.

Response:

ddd. New roads when constructed will largely be gated and closed following use so disturbance should be short-term.

Comment: FW-6

eee. A loop road from San Isabel through Snowslide Timber Sale is opposed because of unwarranted environmental and esthetic degradation.

Response:

eee. A loop road from the top of Greenhorn Mountain to San Isabel would involve considerable environmental impact and would not be proposed without considerable and detailed study.

Comment: F-282 F-274

fff. Develop information programs that point out grim future for fuelwood. Fuelwood demand may not continue if air pollution standards are implemented.

Response:

fff. We do not agree with forecasts of a grim future for fuelwood. Air pollution standards may dampen demand, but we believe this will be offset by continued rising costs of alternative fuels.

Comment: FW-7

ggg. There is a difference between wildlife habitat modified and wildlife habitat improved. We are unable to determine how much timbering is beneficial to habitat improvement. Clearcutting and shelterwood cutting is not beneficial to species which prosper in uneven-aged forests.

Response: ggg. The overall objective is to provide a beneficial mix of age of size classes of trees and other vegetation. Many species of wildlife require uneven-aged forests and a large percentage of the forest will remain in an uneven-aged condition.

Comment: F-258 hhh. The proposed timber, range and mineral programs will seriously impact other resources, particularly wildlife.

Response: hhh. The areas which are impacted each year, for example, by timber cutting are quite small in proportion to the total area. When the activity is completed it is 20 or 30 years before additional disturbance takes place.

Comment: F-297 iii. Clearcutting, new roads, and ski areas will be harmful to wildlife, migration routes, and calving areas. Access will lead to littering. Ruination will occur.

Response: iii. The standards and guidelines in the Plan are designed to deal with possible conflicts between activities and wildlife needs. Specific mitigation is developed for each project. For example, where calving areas are identified, activities are scheduled to avoid these areas during the calving season.

Comment: F-324 F-274 F-234 jjj. There has been a terrific increase in home heating with wood which will increase smog and health problems. We must develop alternative energy sources.

Response: jjj. The regulation of the by-products of burning wood for home heating is the purview of other local, State and federal agencies. Where severe problems exist, some local and State governments have developed ordinances and legislation to deal with the problems.

Comment: F-281 kkk. Reimburse Lake County for a full time inspector for Plan conformance.

Response: kkk. Timber harvest activities are inspected now by qualified U.S. Forest Service inspectors and Contracting Officer representatives. Sale contracts include provisions and penalties to correct improper compliance with these contracts.

Comment: F-66 lll. Timber cutters and miners have undue influence on Forest Service decisions.

Response: lll. Projects are planned and designed by interdisciplinary teams that consider impacts on all resources affected by a proposal.

Comment: F-338 mmm. Many Rocky Mountain timber sites deteriorate after harvesting.

Response: mmm. All areas to be harvested receive an intensive field review before harvest plans are implemented. Areas where site productivity deterioration is predicted would not be harvested.

Comment: FW-7 F-338 nnn. In analysis of timber sales from 1974-1978 the Pike and San Isabel National Forests averaged only 23 cents on the dollar return.

Response: nnn. See Response 9 mm, above.

Comment: F-338 ooo. Analysis was made of FY 1980 and 1981 data and timber sales returned only 33 and 10 cents on the dollar. The burden is on the Forest Service to demonstrate how the preferred alternative addresses this problem.

Response: ooo. When comparing direct costs of timber management (including road costs in support of timber) with timber revenues, it is true that timber harvesting is a deficit practice. However, when considering the benefits accrued to other resources (increased forage, improved wildlife habitat diversity, increased water yields, etc.), the proposed alternative has a benefit/cost ratio of 2.1:1. This means that $2.10 in benefits is returned for each dollar expended. Furthermore, the NFMA Regulations require that lands allocated to the proposed alternative be cost-efficient in meeting Forest objectives, only one of which is timber production. (36 CFR 219.14 (c) (3)).

Comment: F-338 ppp. There is no evidence that timber demand will substantially increase over the planning horizon. A better plan would be to produce to current demand.

Response: ppp. Analysis of the Management Situation (P.A. #4, 8/81) shows the following:

-50 small sawmills demand 13-15 MMBF annually;
-11-12 MMBF demand for commercial fuelwood exists;
-Personal use fuelwood utilization was 20 MMBF in 1980-1981.

These figures demonstrate demand for fiber to be as high as 40 MMBF right now.

Comment:
F-301
F-258
FW-6

qqq. Too much emphasis is on timber harvest in the Plan. Timber harvest is uneconomic because of slow growth, low quality, and difficult access. Timber sales amount to a subsidy to industry. Proposed harvest exceeds demand and timber should be produced in more productive areas.

Response:

qqq. See Response 9 hh above.

Timber harvest is the best method for the Forest Service to maintain a healthy, disease resistent, esthetically pleasing forest that provides the goods and services that will meet public demand.

The installed mill capacity for sawmills is only part of the story. In FY 80 and later years, more fiber was harvested as fuelwood than sawlogs. Both the Plan and FEIS show that a significant percentage of the proposed timber program will be purchased and used as fuelwood by commercial operators and individuals.

Comment:
F-338

rrr. The preferred alternative proposes flooding the market with an additional 24 MMBF of timber annually, going from 23-25 MMBF annually to 39 MMBF annually.

Response:

rrr. Analysis of the Management Situation (P.A. #4, 8/81) shows the following:

-50 small sawmills demand 13-15 MMBF annually;
-3-5 MMBF demand for commercial fuelwood exists, at a minimum;
-Personal-use fuelwood utilization has been as high as 20 MMBF in 1980-1981 (annually).

These figures demonstrate that demand for fiber could be as high as 40 MMBF right now (15 MMBF (ST) + 5 MMBF (CF) + 20 MMBF). Additionally, fuelwood demand has remained strong and the fuelwood figures may be low.

Comment:
F-328

sss. Building custom log homes seems to be a high-value-per-tree use with selective, non-road logging. "Would such a business be appropriate to the type of trees in the Lake County area?"

Response:

sss. A log-home business might well be an appropriate business for Lake County. However, the logs will need to be removed from the Forest and, unless helicopters were used (uneconomical), roads would still need to be used and developed to transport them.

Comment:
F-308
F-277

ttt. The proposed timber harvest is too high. It is based on "pressures from above" and will involve roads and cutting in previously untouched areas. Previously it was the opinion of professional foresters, that the South Park area could only supply a fraction of what is now proposed.

Response:

ttt. The proposed harvest levels are based on analyses completed at the Forest level, not at some upper level in the Forest Service The vegetation management program will definitely involve entering previously untreated areas, primarily because these areas have been identified as needing treatment to improve wildlife habitat, water yields or tree growth. Harvest levels were determined using state-of-the-art methods and techniques; opinions, whether from professional foresters or others, were condsidered in the analysis.

Comment:
W-107

uuu. Problems with water yield clearcuts still exist and such cuts should be applied sparingly. The U.S. Forest Service should consider the following:

"(a) Reduced early season runoff and increased late season stream flows are better for wildlife and fish.

(b) If more water is held in the forests until late summer and fall, fire hazards will be lower.

(c) Trees and range forage benefit from having more late season moisture; productivity is higher and erosion is reduced.

(d) Increased runoff early in the season is of little use to agriculture, which places highest demands on irrigation water in August and September when it is most needed."

Response:

uuu. Since increased water yields are based on snow pack management, there is little or no opportunity to affect late-season stream flows through vegetation management.

Moisture levels in the Forest in late summer and fall are dependent on moisture received during the summer Vegetation management will have little or no effect on these levels.

Increased water yields will contribute to water storage in reservoirs and other impoundments. Therefore, much of an increase in yield would be available for use in late summer and fall if sufficient storage capacity is present.

Comment: F-321

vvv. Management near Box Creek to control dwarf mistletoe was not successful as this area in now heavily infected with dwarf mistletoe. "Evidently the U.S. Forest Management Plan was not carried through or failed."

Response

vvv. Management in the Lodgepole Flats and Box Creek areas has been successful where stands have been regenerated, which has served to eradicate or significantly decrease dwarf-mistletoe infections. However, much of the area has not yet been regenerated and dwarf-mistletoe will continue to be present until it is.

Comment: W-568; F-14 W-666; W-48 W-195

www. Timber cutting along the road to Greenhorn Mountain should not be allowed because of the impact on the Wilderness Study Area and on natural beauty.

Response:

www. Timber cutting is not proposed within the Greenhorn Wilderness Study Area.

Comment: F-258

xxx. The Plan contains no justification for use of clearcuts in spruce/fir as required by 36 CFR 219.15.

Response:

xxx. Analysis required by 36 CFR 219.15 was completed by the Rocky Mountain Region during preparation of the Regional Guide (issued April, 1983). It found that shelterwood, clearcut, single-tree selection and group selection cutting are appropriate harvest (regeneration) methods for spruce/fir forests.

10. TRANSPORTATION

Comment: F-214 F-338 F-223 F-136 F-301 W-107

a. Oppose increased road construction for timber and oil, gas, and minerals because:

- wildlife would be disturbed;
- off-road use by trailbikes, 4-wheel drive and snowmobile vehicles would increase fire danger, and timber theft;
- roads are deficit financed;
- cannot maintain what we have now;
- cause erosion and reduce water quality;
- cause adverse visual effects; and
- adversely affect private property.

Response: a. Most local roads constructed will be closed after the resource work is completed Wildlife might be disturbed for a short period during construction and resource work. However, roads will be closed and construction curtailed in critical habitat during use by wildlife. These areas include habitat such as elk calving areas and critical big game winter range. The only local roads left open would have to be justified.

- various techniques have been developed for controlling road use. These range from gates to actually obliterating road entrances during periods of nonuse.
- fire danger and timber theft can be curtailed through proper road management.
- economic analysis will be made during the project planning stage to determine economic feasibility. The minimum road standard necessary for the activity will be constructed.
- seasonal and permanent closures will be used to bring maintenance needs in line with the maintenance budget.
- erosion control techniques will be incorporated into road designs. Roads will not be constructed where it is impossible to prevent unacceptable erosion.
- expertise is available to minimize the visual impact of roads. Road construction will be monitored to insure compliance with visual objectives proposed for the area.

Comment:
F-307
F-126
F-283
F-248
F-315

b. Opposed to proposed new roads on the Greenhorn. Road construction is too expensive and would result in negative impacts to visuals, streams and wildlife. Oppose proposed road up Low Pass Gulch, which would cause damage.

Response: b. This road will access approximately 10 MMBF of timber. Detailed project planning will be done to determine economic feasibility and to assure that all objectives for minimizing adverse visual effects, soil erosion, stream sedimentation and wildlife disturbance are met. The road will be in compliance with the objectives or not be built.

Any management activities in the Low Pass Gulch area will be accomplished using the existing road system or by reconstructing portions of the existing system. No new roads are planned.

Comment: F-307; F-126 F-283; F-248 F-325

c. Reduce trail construction from 46 to 20 miles per year.

Response:

c. The Forest Plan includes an average of 20 miles of trail construction/reconstruction year. The RPA alternative (Alternative C) included 46 miles per year in order to incorporate the emphasis on trail construction as presented in the National program.

Comment: F-308 F-83 F-78 F-34

d. Do not close all roads. Forest Service policies need to be changed to allow low maintenance or no maintenance on roads that are functioning perfectly (i.e. not causing damage). Policy needs to be flexible so Forest Service can recognize roads that can function with little or no maintenance, as in the past, and can be left open for ORV use.

Response:

d. The Forest Service maintenance policy is to keep a roadway functional, safe, and minimize impact on the resources. As many roads as possible will remain open within budget limits, depending on the Forest need for low standard roads for resource management and recreation use, and in accordance with management area direction.

Comment: F-120 F-77 F-73 F-84 F-308

e. Opposed to the closure of primitive roads, trails, and areas currently open to 4x4 vehicles for recreation purpose. Closure will keep young, old, and handicapped people out of the Forest.

Response:

e. Resource protection, user safety and Forests' maintenance budget will be considered before closing primitive roads. Road management will also consider resource management needs, recreation uses and management area directon.

Comment: F-68 F-73 F-77

f. Do not want closure of the following specific areas: Ice caves, North Fork, Beaver Creek, Crow Creek, Frenchman Creek, Silver Creek, Elk Creek, Burns Peak, Lake Creek, Schoolmarm Mountain, West Tennessee, Halfmoon, Poncha Creek and Williams Pass.

Response:

f. Specific road closures will be evaluated on a case-by-case basis at the Ranger District Level. The closure of specific roads and trails may be accomplished through administrative action under

all Plan prescriptions to meet resource needs. Management objectives as well as resource requirements are considered.

Comment: FW-8 F-155 F-259

g. Roads for timber and oil and gas development have a negative impact on wildlife. See Colorado Open Space Council position paper and White River National Forest PA-6 for handling this problem.

Response:

g. Wildlife may be affected during construction and resource work. New local roads will be closed when not needed for resource work or to meet other management objectives. Utilization studies and monitoring will be done on roads open to traffic.

Comment: FW-8

h. Present and future road systems should be shown on separate maps. This includes all roads from Federal highways to local intermittent roads.

Response:

h. The final road locations depend on the resource work to be done in an area. The arterial and collector roads were shown but the local roads will depend on the selected alternatives at the project level of planning. The mileage for local roads is an estimate of the road mileage necessary to accomplish the resource work.

Comment: W-107

i. Each Forest Plan should include a road plan specifying roads to be closed, constructed, and maintained.

Response:

i. The Forest will publish and update yearly a Travel Management map showing open areas, open roads and roads or trails with restrictions. Specific road management requires detailed analysis that is beyond the level for this Forest planning process.

Comment: F-166

j. Quail Mountain is infeasible because Highway 24 is not large enough to handle traffic flow.

Response:

j. Highway 24 is in the State Highway short range improvement schedule. These details will be considered in the future decisions on Quail Mountain.

Comment: F-14

k. The Forest Service is too short of funds to maintain washed out roads and trails, such as Road No. 427 from Rye to the Bartlett Trailhead which is often badly washed out or to keep campgrounds and picnic areas open, but simultaneously can afford to build plush new office buildings such as the two-story Pueblo center and churn out mammoth volumes such as this EIS.

Response: k. The purpose of the Forest Plan is to identify needs and provide a management program reflecting a mix of management activities that allows use and protection of the Forests' resources, fulfills legislative requirements, and addresses local, Regional, and National issues. Administrative facilities adequate to meet the needs of carrying out the administration of the Forest are essential as they would be in carrying out any business. Space, furnishings, and amenities of offices are carefully controlled by laws, regulations, and an extensive review program.

Comment: F-242 W-634 l. Additional road construction compounded with increased litter problems are detrimental to the tourist industry.

Response: l. Location and design of roads will employ methods to minimize the visual impacts. Road construction will be in compliance with the visual objectives for the area or not be built.

Logging slash will be controlled through administration of the timber sale contracts. Other litter will be controlled through the Forest Law Enforcement program.

Comment: L-11 m. Timber sales operate at a loss. Keeping roads closed after sales presents problems especially when funds and staff may not be available.

Response: m. Roads planned to remain on the system are a long-term investment and will be used for resource administration in the future. Not all the timber in an area is harvested at one time and numerous sales extending over many years will use the same road. Keeping roads closed will be an administrative problem to be solved through education and law enforcement efforts.

Comment: F-14 n. Corridors such as Hermit Lake and South Colony roads and the Comanche Lake trail are reasonable with limited motor access.

Response: n. Roads and trails that are safe for their intended use and have maintenance funds available to prevent resource damage will not be closed.

Comment: F-226 o. Trails 674, 675, and 677 should not be open to ORV use because they are close to private land

and ORV's cause a loud noise nuisance which drives away wildlife as well as detracts from the quiet and solitude of the mountains. This area should be a 3A Management Area emphasis.

Response: o. Management Area Prescription 2B the prescription for this area allows for prohibiting or restricting motorized travel on designated routes to protect physical and biological resources.

11. WATER

Comment: F-136 FW-8 a. You justify clearcutting by projecting a 2 percent increase in runoff. Increased sediment yield (erosion) is a potential problem. Why not just pave the whole Forest? Patch clearcutting will increase water yield negligibly and increased runoff in the spring is not needed.

Response: a. The potential water yield increase is small in comparison with the total Forest production of water. However, water increase within threshold limits is extremely important to all water users in the State. Management activities are necessary to maintain water yield.

The Plan states there are "appropriate" measures (to increase water yield by 2 percent)--it does not condone them as carte-blanche prescriptions for all areas.

Comment: FW-8 b. Wilderness designation would not reduce net water yield on the Forest.

Response: b. This is true. Since no vegetation management activities for water yield increase would be acceptable in designated wilderness, these areas would not be available for the water yield prescription.

Comment: F-241 c. "Timber harvest, particularly an intensive harvest, will reduce water holding capacity of the watershed; clearcutting will practically destroy it for the foreseeable future."

Response: c. Research has proven that patch cutting results in significant redistribution of the winter snowpack Snow accumulations are optimum when openings are less than eight tree heights in diameter, protected from the wind and interspersed so that they are five to eight tree heights apart Because more snow is deposited in the openings, and less snow

accumulates in the uncut forest, total snow storage on headwater basins is not significantly decreased.

When the forest is harvested in large clearcut blocks (greater than eight tree heights in diameter), overall water yield increases are far less than those attained than by using the smaller patchcuts. In large clearcuts, those over 15 tree heights in diameter, water yields may actually be decreased.

Comment: W-107

d. Mining operations should not be permitted without a mitigation plan approved by all agencies, Governments, and Forest user groups, to protect watersheds.

Response:

d. Mining operations require a bond, as well as a plan of operation which specify mitigation measures designed to reduce or prevent adverse environmental impacts. The State of Colorado also has certain requirements for mitigating adverse environmental impacts from mining activities. The operating plan must be approved by the Forest Service.

Comment: F-14

e. Do not build dams for development of water resources.

Response:

e. Water storage facilities are a necessary part of the water management process but would be evaluated on a case-by-case basis as proposals are developed.

Comment: F-234 FW-1 F-241 W-617 W-107

f. Many drainages are already over-burdened by diversion water and cannot handle increased water supply. Mountain communities and ecosystems need water for survival as well as the metropolitan Front Range. Quality is much more important than quantity.

Response:

f. Water yield increases must be within the threshold limits of the individual streams that would be affected.

Comment: FW-8

g. The Arkansas River is a poor candidate for increasing water yield. Clear cutting results in earlier flows with lower quality water. The South Platte River already has 300,000 acre feet of water that is unused. The Forest Service has not done an analysis to determine if benefits from clearcutting are justified.

Response: g. The Arkansas River basin is already short of water for irrigation by 490,000 acre feet (SCS-Arkansas River Basin Cooperative Study Report).

The South Platte River Basin is over appropriated. In normal years, there is not enough water to meet the appropriation needs in the South Platte basin. Lack of water storage is one of the major factors contributing to this shortage. (State of Colorado, Division of Engineers Office, Water Division 1).

Comment: F-269 h. Two percent increase in water yield would result in the loss of many Forest areas for wildlife.

Response: h. The small size of the patch cuts necessary to produce the optimum water yield will not detrimentally effect deer and elk. For optimum water yields, 40 percent of a 1 to 3 square mile subalpine watershed is occupied by small openings and 60 percent is left uncut.

Comment: F-343 i. The Plan should identify the most appropriate areas for water development. A plan for dealing with water projects as they are proposed should be outlined in detail in the Plan.

There is no discussion on the effects of weather modification.

Response: i. The identification of appropriate areas for individual water developments is beyond the scope of the Forest Plan. Water development proposals will be dealt with on an individual project basis. The NEPA process will be followed and an Environmental Impact Statement or Assessment will be prepared at that time.

Weather modification is one possible means for increasing water yield from the Forest. If weather modification is used on this Forest, then an Environmental Impact Statement or Environmental Assessment would be prepared.

Comment: F-324 F-133 j. New water conservation efforts should be implemented in Front Range communities rather than destroying the natural beauty of this area for a minimal two percent increase.

Response: j. The Forest Service is in total agreement that water conservation efforts need to be implemented throughout Colorado in order to

preserve the water resource. Water management practices applied using landscape management principles can be in harmony with esthetic values.

Comment: F-338 W-107

k. The Forest Plan must carefully consider water quality impacts of planned increases in road construction. The Proposed Plan is not in agreement with the preferred alternative in regard to new road construction.

Response:

k. Water quality is addressed in the Final Plan. Threshold limits will dictate mitigation action necessary at the project level. (The threshold limit is the maximum amount of sediment a stream system can carry without changing the existing channel stability. The patch cuts can be accomplished through commercial timber sales as well as fuelwood sales for the public.)

The Final Plan has planned construction and reconstruction of local, arterial and collector roads in agreement with the preferred alternative (Proposed Action). See Appendix C, Forest Plan and Alternative A, Chapter II, FEIS.

Comment: F-289

l. The Plan does not speak to the Denver Water Board's major facility on the Pike and San Isabel National Forest land.

Response:

l. The Final Plan states that water storage and transmission facilities are an authorized use of National Forest land. However, no action of approval for such projects will be done without thorough case-by-case analysis. The Denver Water Board's recent proposal of a dam and impoundment for water storage on the South Platte River is addressed in the FEIS and Plan. This project is known as the Two Forks Dam and Reservoir. See Chapter I, FEIS, and Chapter II, Forest Plan.

Comment: F-268

m. Increasing water yield by 2 percent from federal lands unfairly subsidizes needs of users like the Denver Water Board.

Response:

m. Increased water yields are subject to existing Colorado water laws of prior appropriations.

Water rights and laws pertaining to water rights govern those who obtain water from Federal lands. The Forest Service in all its planning actions complies with these laws,

which are both State and Federal. Increasing water yields from Federal lands to meet needs of legal users is not an unfair subsidy.

Comment: F-109, F-259

n. Since annual snowfalls on certain areas of the Forest can vary more than 300 percent, questionable watershed improvements hardly appear to offset the cost to other Forest uses.

Response:

n. Due to the considerable length of time it takes for coniferous subalpine forests to grow to maturity, increased water yields from patch-cutting can go essentially undiminished for perhaps 20 years and longer. Water increase due to snow fences, would last as long as the life of the fence.

Comment: F-312, F-260

o. Trees are of little commercial value and loss of soil from erosion does not justify cutting trees for a two percent water yield increase.

Response:

o. Timber harvest measures recommended for maximum water yields will not be detrimental to water quality or excessively increase soil erosion, provided that timber harvesting is executed with proper planning, engineering, construction, and follow-up maintenance. Water yields will not be increased past the threshold limits. The threshold limit is the maximum amount of sediment a stream system can carry without changing the existing channel stability. Patch cuts can be accomplished through commercial timber sales as well as fuelwood sales for the public.

Comment: F-301, FW-6, F-126

p. Studies indicate that clearcutting is not a proven method to increase water yield and trade-offs such as soil erosion would be undesireable.

Response:

p. A considerable amount of knowledge accumulated during the past 50 years has conclusively shown that subalpine forests exert a significant effect on water yields. (Hoover, Marvin D., The Influence of Forest Cover on Stream flow in the Central Rocky Mountains, FS-RM-1602). When 40 percent of a densely forested subalpine watershed is occupied by small openings (less than 8 tree heights in diameter) and 60 percent is left uncut, annual water yields may increase as much as 2 to 3 inches above the norm. (Leaf, USDA Forest Service Research Paper, RM-142). The water yield prescription states that sediment yield increases will be restricted to threshold limits. Existing channel stabilities cannot be decreased.

Comment:
F-338
F-297
F-201
F-292

q. Two percent water yield for the Front Range is not worth the trade-offs, i.e. - destroying the Forests' natural filtering system thus increasing stream and reservoir sedimentation.

Response:

q On all aspects, snowmelt in clearcut openings is more rapid than in the uncut forest. This accelerated melt causes streamflow to be higher on the rising limb of the hydrograph than before harvest cutting. Where there is considerable natural regulation in the form of deep, porous soils, recession flows are not changed appreciably and annual flood peaks are not significantly increased, provided that the forest cover on no more than 40 percent of the watershed is removed in a system of small openings.

Timber measures recommended for maximum water yields should not be detrimental to water quality, provided that timber harvest is executed with proper planning, engineering, construction, and follow-up maintenance. Buffer strips are also required around all live bodies of water. Mitigating measures on timber sales are designed to control at least 83 percent of the sediment if not more.

Comment:
F-252
F-331

r. Clearcutting program is excessive in order to obtain a projected two percent increase in water yield. Conservation measures in Front Range communities would be more practical.

Response:

r. The pattern in which trees are harvested, to a large degree, determines whether or not run-off will be increased. Highest increases in streamflow result when subalpine forests are harvested in a system of small forest openings. When the forest cover is removed in large clearcut blocks, or by selectively cutting individual trees, overall water increases are far less than that attained if an equivalent volume is removed in patches. When 40 to 50 percent of the mature spruce/fir volume is removed from north slopes on a selection-cut basis, water yields may actually decrease somewhat. Acute water problems will develop in Colorado unless water supplies are increased through conservation, water management, recycling, and efficient irrigation practices

Comment: W-107

s. Recommend no new roads be built or timber sales scheduled in riparian areas or on steep or unstable soils.

Response:

s. Management Area Prescription 9A states that healthy plant communities, high water quality, wildlife and fish habitats, and stable stream channels will be maintained in riparian areas. This does not preclude road construction or timber harvest. Extensive mitigating measures may be required in these areas in order to meet the prescription standards. Where the mitigating measures cannot meet the required standard for the prescription, then the activity will not be allowed to occur.

Comment: F-343

t. The Plan needs more guidance on wetlands.
-how are they protected;
-will practices damaging to wetlands be prohibited or mitigated; and
-what is a wetland?

Response:

t. Management activities implemented on the Pike and San Isabel National Forests are subject to Executive Order 11990 which protects wetlands. This Executive Order states that all federal agencies shall provide leadership and take action to minimize the destruction, loss or degradation of wetlands. Detailed mitigation measures will be presented on a project-by-project basis for any activity on the Pike and San Isabel National Forests that will impact wetlands. Wetlands are those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances, do or would support a prevalence of vegetation or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction.

Comment: F-343

u. While we include management for increased water yield in the Plan, we do not mention planned or potential water developments.

Response:

u. It is not the intent of this Plan to list every possible location for a reservoir or other water developments on the Forest. All proposed water developments are dealt with on an individual basis. If the projects are significant, then environmental impact statements will be prepared.

Comment: F-321

v. No facts have been shown that there will be a net gain in water yield from areas designated for this.

Response: v. See response 11c, this section.

Comment: F-260 w. "No water testing was done." No provisions have been made for property damage downstream, off Forest. What about minerals in the water that would be detrimental to the health of domestic livestock and wildlife?

Response: w. All water on the Forest must meet State and Federal water quality standards. Activities that occur on the Forest will not be allowed to degrade the water quality below these standards.

Comment: F-258 x. We do not believe clearcuts are the appropriate way to increase water yield in this area (Guadagno, 1982). Can watersheds absorb the increased runoff? Will water quality be affected? Is there sufficient downstream storage capacity?

Response: x. See response 11c, this section. The water yields will not be increased above the streams existing ability to carry the additional water. A threshold sediment level will be established for each stream. This threshold level is that level of sediment that a stream can carry without changing the existing channel stability of the stream. On the Arkansas Drainage there are Twin Lakes Reservoir, Clear Creek Reservoir, Turquoise Reservoir and Pueblo Reservoir. On the South Platte Drainage there are Antero Reservoir, Tarryall Lake, Eleven-Mile Reservoir, Cheeseman Reservoir, Strontia Springs Reservoir and Chatfield Reservoir.

Comment: F-240 y. I believe increased water yield is necessary in Colorado, but the impacts of the present proposal are too great. Increased water yield can best be met where multiple use of clearcutting can be maximized, (recreation use, pest and fire control, habitat enhancement and fuelwood production).

Response: y The alternative that maximizes water yield is not the proposed action. To produce the maximum water yield does not fit into the proposed management scheme.

12. WILDLIFE

Comment: F-303 W-107

a. Use of "willingness to pay" in wildlife and fish economic analysis does not properly value wildlife benefits because:

- supply and demand techniques are not used
- it does not include diversity, visuals, clean water, and recreation quality or benefits.

Response:

a. Resources were not available to complete a detailed analysis of values using the travel cost method which is the most accurate. The values used were those developed as part of the National RPA Planning Process.

Comment: F-303

b. The DEIS should provide management objectives for habitats such as kind of habitats needed, activities needed, project locations, rationale, impacts and duration of the improvement.

Response:

b. Broad objectives have been provided for the entire Forest and Grasslands and have been further refined to more specific objectives for management areas.

Comment: F-303

c Distinction should be made between tree harvest primarily for timber, and tree harvest primarily for improved habitat diversity.

Response:

c. The assignment of Management Area designations has defined which areas will emphasize different uses. All resource uses are considered in each management area. This means that wildlife needs will be considered in a management area where timber production is emphasized but in a wildlife management area, timber activities will be specifically designed to enhance wildlife.

Comment: F-155

d. Wildlife structural habitat improvements should be summarized by type and location.

Response:

d. Individual projects have not been identified in the Plan. Type of improvements or structure will be determined on case-by-case basis.

Comment: F-155

e. A table displaying acres in each seral stage by decade should be included.

Response:

e. Acreage by seral stage is included in the Final EIS, and is available in more detail in the planning records See Vegetation in Chapter IV of the FEIS.

Comment: F-155

f. Wildlife management should be practiced in municipal watersheds.

Response:

f. Wildlife management practices compatible with water quality needs are allowed within the limits of watershed agreements.

Comment: F-155 F-343

g. The State(s) should be involved in monitoring and their responsibilities described.

Response:

g. The Forest Monitoring plan calls for utilizing state data, which requires coordination with appropriate State agencies.

Comment: F-258

h. The Plan should display what wildlife practices will be applied and where they will be applied.

Response:

h. Management Area Prescriptions describe the general activities which can be applied. Some practices and locations are given in Appendix A, while others are identified on a project by project basis.

Comment: F-257

i. Wildlife management guidelines in the Plan are inadequate.

Response:

i. Management guidelines have been expanded and improved in the Forest Direction and Management Area Prescriptions, Chapter III, in the Plan.

Comment: F-258 F-303

j. The Plan should be more specific about what types of habitat improvement is being proposed.

Response:

j. The Final Plan and EIS show the types of management activities which will be used for habitat improvement.

Comment: F-303

k. The beneficial relationships between logging and wildlife habitat conditions has not been demonstrated and requires additional analysis.

Response:

k. The explanation of this relationship has been expanded in the Fish and Wildlife section under Resource Elements, Chapter III and in the Fish and Wildlife section under Direct and Indirect Environmental Effects, Chapter IV of the FEIS.

Comment: FW-6

l. Since all-aged timber stands perpetuate themselves and are better for wildlife, they do not require treatment to increase habitat diversity.

Response: l. Through periodic timber harvest all-aged stands can often be more productive of understory habitats while still maintaining their uneven-aged characteristics. Where uneven-aged stands are common, treatment to create even-aged seral stages is often desirable to provide for specific needs of desired wildlife species, and to increase general habitat diversity.

Comment: FW-6 m. An analysis of road density and the effect on wildlife solitude should be done.

Response: m. An analysis has been done and is described in the Fish and Wildlife section under Resource Elements, Chapter III and in the Fish and Wildlife section under Direct and Indirect Environmental Effects, Chapter IV of the FEIS.

Comment: F-303 n. If, during the first decade Alternative A and C both produce high outputs of wildlife habitat and water, and Alternative C meets the predicted demand for wood fiber, why does Alternative A need to harvest an additional 3,902 acres/year of timber above the level of Alternative C?

Response: n. The additional areas are harvested in Alternative A because of working in lower quality (productive) sites in order to enhance the wildlife resource.

Comment: F-303 F-258 o. Possible adverse effects of logging should be better analyzed, specifically:

- increased sedimentation;
- loss of wildlife solitude on habitat effectiveness;
- stream bank stability;
- insects and disease in young, mono-culture tree stands; and
- high cost of stand cultural treatments.

Response: o. Chapters III and IV of the Final EIS have been expanded to provide additional information on effects of the preferred alternative. Application of new Forest Direction and Management Area Prescriptons will mitigate or prevent potential adverse effects.

Management Requirements (both Forest Direction and Management Area Prescriptions) in Chapter III of the Forest Plan contains the management direction to be applied.

Comment: W-107

p. Research has shown that partial cuts, rather than clearcuts are better for:

- tree regeneration and
- high small mammal diversity and reduced negative effects on regeneration.

Response:

p. Neither partial cutting nor clearcutting is always best for tree regeneration or small mammal diversity. Depending on vegetation type and condition, and specific resource objectives for sites, either type of cutting practice may be selected.

Comment: W-107 F-321

q. Timber cutting benefits only a few wildlife species.

Response:

q. Specific habitats created by timber cutting are required by a number of wildlife species, as are the edge habitats and diversity of habitats which usually also result. Because of natural succession, habitats usually change even when no cutting occurs. The important point is to protect or change habitat quality and quantity through time to achieve specific wildlife habitat objectives, as well as produce other resource benefits.

Comment: W-107 F-312

r. Timber sales should not occur within one-half mile of elk calving and nursing habitat, and should provide both adequate forage and cover.

Response:

r. Forest Direction and Management Area Prescriptions in Chapter III of the Plan respond to this concern through the use of seasonal logging practices, travel management restrictions, as well as other specific standards and guidelines.

Comment: F-258 F-303 W-107 FW-6 F-257

s. The management indicator species should include:

- ecological indicator species
- wetland species, more fish species, and species which require sage, pinon/juniper and oak habitat
- species with very specific habitat requirements (stenotopic species)
- species whose populations can be monitored periodically and in a practical manner.

Response:

s. The list of Management Indicator Species (MIS) has been expanded in the Wildlife and Fish Resource Management section under Management Requirements in Chapter III of the Plan.

Comment: F-258, F-303, W-107, F-257

t. The habitats that MIS represent should be displayed.

Response:

t. The Fish and Wildlife section under Resource Elements in Chapter III of the Final EIS has an expanded chart that provides more detail on species, habitat type and abundance of Management Indicator Species.

Comment: F-303

u. To evaluate the condition of existing wildlife populations, the current status of MIS populations and their habitats should be given, specifically:

- population figures
- distribution
- population vigor
- habitat condition
- habitat trend
- potential threats to populations

Response:

u. This information, when available, was used in evaluating conditions for wildlife and in selecting a preferred alternative. More of this information has been displayed in the Fish and Wildlife section under Resource Elememts in Chapter III of the FEIS.

Comment: F-303

v. Management objectives for all Management Indicator Species should be given, along with supportive rationale.

Response:

v. Goals for managing the habitats of Management Indicator Species (MIS) are displayed in the Plan. Specific objectives are made, where possible, for habitat carrying capacity, or amounts of habitats needed by various MIS. Minimum standards for wildlife habitats are given in the Wildlife and Fish Resource Management section under Management Requirements in Chapter III of the Plan.

Comment: FW-6, F-257, W-107, F-258

w. The Forest Plan should include specific measures to maintain and improve habitats and populations of all threatened and endangered species.

Response:

w. All listed threatened and endangered species and their habitat needs are now provided for in Forest direction, (Chapter III) in the final Plan.

Comment: F-303 F-257 FW-6 W-107 F-258 F-343

x The DEIS does not identify the adverse effects (including cumulative effects) of the following activities on wildlife populations and habitats:

- increased logging;
- road construction;
- developed recreation;
- motorized vehicle use;
- increased grazing ;
- oil and gas leasing; and
- human activities.

Response:

x. Forest Direction (Management Activities C01, C02 and C12) and Management Area Prescriptions (4B and 5B) in Chapter III of the Forest Plan have been revised to limit anticipated adverse effects on wildlife. The FEIS includes discussion of the anticipated effects on wildlife populations and habitats from the noted activities.

FEIS.

Comment: FW-7

y. Specific locations where winter range is a factor limiting deer, elk, and bighorn populations should be given.

Response:

y. Big game winter range distribution has been mapped, and is part of the planning records. Areas where range may limit populations are mapped in the Plan and will be managed under the 5B Management Area Prescription. (Emphasis is on big game winter range in forested areas.) See the Forest Plan Map, Map Pocket, at the back of the Plan.

Comment: W-107

z. Poisons should not be authorized in predator control because they are non-selective, and pose serious human health hazards.

Response:

z. The only poisons used are those registered with EPA. All of their guidelines are followed. Any request for predator control is evaluated for its short and long-term effects.

Comment: F-208

aa. The area north of Twin Lakes should be winter range emphasis due to its critical importance to the Mt. Elbert elk herd.

Response:

aa. This area is heavily used by big game in the winter. The area is also presently heavily roaded and high recreation use occurs. Forest direction does provide for road and seasonal closures as necessary. Implementation of Forest Direction will

resolve conflicts between wildlife and people in this area during winter. A portion of this area has been changed from 2B (Emphasis on Rural and Roaded Natural Recreation) to 5B (Emphasis on big game winter range in forested areas). See the Forest Plan map, Forest Plan map pocket.

Comment: F-303

bb. Evaluation of wildlife habitat on the National Grasslands has not been done. Analysis should be done to evaluate habitat quality, determine management needs and specify management objectives.

Response:

bb. Management direction provides that management objectives be specified. It is impossible to do detailed analysis in broad planning efforts of the Forest Plan. Specific wildlife needs are considered in each allotment management plan.

Comment: F-257

cc. The southern portion of the Comanche National Grassland has unique habitats and wildlife species, and should be given special study and better management study.

Response:

cc. This need has been recognized with a change to wildlife and riparian area management emphasis. The Plan changes management emphasis from Prescription 2B (Emphasis on Rural and Roaded-Natural Recreation) to 4B (Emphasis on Habitat for Management Indicator Species) with Prescription 9A (Emphasis on Riparian Area Management) in riparian areas.

Comment: F-257

dd. Current fencing practices encourage tall vegetation growth around water developments which inhibits water use by some species.

Response:

dd. Tall vegetation is encouraged to provide cover for many species. Some overflow pits and ponds are not fenced or are split by a fence.

Comment: F-257

ee. Tree planting on the Grasslands should be done only where the species historically occur, and where available moisture exists.

Response:

ee. Extensive tree planting on the National Grasslands is not anticipated. Use of indigenous species is encouraged.

Comment:

ff. The Plan should be greatly improved to reflect

F-258
F-148
F-155
F-14
W-226
W-678

the fact that wildlife, recreation, and watershed protection are the most important resources on the Pike and San Isabel National Forests.

Response: ff. The goals as stated in Chapter III of the Forest Plan reflect the importance of the fish and wildlife, watershed, and recreation resources.

The Forest Plan places great importance on all resources of the National Forests and Grasslands. These resources are managed under provisions and guidance of many laws, two of which are the Organic Administration Act of June 4, 1897 (Ch. 2, 30 Stat. 11, as amended; U.S.C. 473-475, 477-482, 551) and the Multiple-Use Sustained-Yield Act of 1960 (P.L. 86-517, 74 Stat. 215: 16 U.S.C. 528 (note), 528-531).

Comment: gg. In elk habitat, lease exploration and development stipulations should include mitigation to:
W-107
F-343

- protect habitat quality;
- provide solitude;
- minimize surface disturbance; and
- control access.

Response: gg. When recommending consent for lease applications special stipulations are attached as necessary to mitigate specific impacts on resources. Operating plans prepared by the operator must be approved by the Forest Service and must include required mitigation measures.

Comment: hh. Additional road construction is very expensive, and will increase poaching, reduce hunting quality and reduce hunter success.
F-258
F-260
F-133
W-107

Response: hh. Road construction and management, and travel management will be done to meet a variety of resource objectives. All new roads will be closed unless specific objectives, such as administrative use or appropriate hunter access cannot be met. See Transportation System Management in Forest Direction, Chapter III of the Forest Plan.

Comment: F-260 F-307 W-107

ii. Habitat improvement will not really occur if effective road and travel management, which allows wildlife use of treated areas, is not implemented.

Response:

ii. Habitat improvement encompasses not only modified vegetation changes to meet wildlife habitat objectives, but associated road and travel management as well. See Forest Direction and Management Area Prescriptions in Chapter III of the Forest Plan.

Comment: W-107

jj. Snowmobile use should be prohibited on winter range and endangered species habitat.

Response:

jj. Where actual or potential conflict occurs, endangered species habitat will be protected. Snowmobile use will be managed to prevent stress to big game on Winter Range Management Areas (Prescription 5B), Management Area Prescriptions, Chapter III, Forest Plan.

Comment: F-107

kk. Off road vehicles should be restricted to existing roads and trails, and excluded from calving/nesting areas and migration routes.

Response:

kk. Under Management Area Prescriptions which allow motorized vehicle use, travel may be prohibited or restricted to designated routes in areas where wildlife calving/nesting areas or migration routes need protection.

Comment: F-197 W-107

ll. Endangered, threatened and sensitive plant species have not been adequately considered, or necessary management actions described in the DEIS and Plan.

Response:

ll. A statement has been added in Forest Direction that deals with study and protection of habitat of plants being considered for threatened and endangered status. There are several potential candidates and their eligibility changes rapidly as more study is done. A list of known species is included in the section on Threatened and Endangered Species in Chapter III of the FEIS.

Those plants identified now or in the future, to be studied for inclusion as threatened or endangered species will be protected pending completion of appropriate studies. If any plan species is classified as threatened or endangered habitat protection will be according to the species recovery plan.

Comment: F-258; F-343 F-307; F-257 W-107

mm. The Plan does not adequately show how riparian zones will be managed for their extremely valuable resources, especially wildlife and fish.

Response:

mm. All riparian areas will be managed under Forest Direction and the direction, standards and guidelines given in the new Riparian Management Area Prescription (9A) in Chapter III of the Plan.

Comment: F-257 W-107 F-258

nn. Any negative effects on grazing on riparian habitats should be prevented.

Response:

nn. Grazing in riparian areas will be managed for mid-seral stage riparian in accordance with Management Prescription 9A which emphasizes protection and management of riparian areas.

Comment: F-155 F-303

oo. Better wildlife standards and guidelines are needed to assure wildlife habitat improvement and evaluate the effects of timber harvest on wildlife.

Response:

oo. The Plan's Forest Direction and Management Area Prescriptions are more specific than those displayed in the draft. Flexibility is purposely left so that individual projects can be designed specifically to benefit wildlife species in a project area. The list of Management Indicator Species has been expanded which will help evaluate project impacts on habitat.

Comment: F-303

pp. Increased diversity in lodgepole and aspen habitats will not occur through cutting since there is presently such a small percentage of these habitats in the mature structural stage.

Response:

pp. Acreage of mature aspen and lodgepole pine stands will increase as trees in current pole-sized stands mature through natural succession. Pole-sized stands of aspen and lodgepole pine will be the focus of treatment to create lower successional stages and increase diversity.

Comment: F-155 F-303 FW-6 W-107

qq. The parameters used to calculate diversity and the meaning of diversity index should be given, in order to understand how habitat diversity effects wildlife.

Response: qq. The Final EIS has better described diversity and its significance on wildlife habitat. See Habitat Diversity section, Chapter III, FEIS.

Comment: W-107 rr. More than 5 percent of forested areas, and more than 20 percent of mature stands should be old growth/unmanaged stands to provide adequate habitat diversity.

Response: rr. Specific Diversity Units will be managed to provide more than the 5 percent minimum amount of old growth habitat, according to wildlife habitat objectives for each Unit. Diversity will change with natural succession as well as with specific habitat treatments.

Comment: F-303 W-107 ss. The habitats required by "habitat specialists" species might be degraded if treatments to increase habitat diversity are practiced.

Response: ss. The expanded list of Management Indicator Species will help in project evaluations since they are representative of a number of species. Projects are designed based on total habitat evaluations and consideration of specific wildlife species.

Comment: W-680 W-107 tt. Road construction, logging, and mineral development can harm stream fisheries, and should not be allowed in riparian areas.

Response: tt. The Plan includes a Riparian Area Management Prescription (9A). See Management Area Prescriptions Chapter III, Forest Plan. This prescription emphasizes healthy, self-perpetuating plant communities, water quality, stable channels, and wildlife and fish habitat quality. Any necessary road construction, logging or minerals development in these areas will be done in ways to minimize adverse impacts.

Comment: W-107 F-155 uu. Adequate snags and old growth should be protected and provided to meet the habitat requirements of cavity nesting wildlife species.

Response: uu. Snags and old growth are protected and managed according to Forest Direction given in the Final Plan. Higher habitat capability management levels are outlined in some Management Area Prescriptions.

Comment: F-109 F-269 F-307

vv. Removing overstory conifer forests will not benefit deer and elk because:

- winter forage is not a limiting factor;
- forage will not result from cutting due to poor soil and moisture conditions;
- additional summer range is not needed; and
- most clearcut sites will be inaccessible during winter because of snow depths.

Response:

vv. Deer and elk winter range is considered a factor which is limiting some populations. An increase in forage due to cutting practices can be expected.

Those sites which have poor soil and moisture conditions will not be as productive as better sites. Better summer range quality will carry more deer and elk through their yearly life cycle, especially when severe winter range conditions occur. Where snow depths preclude big game use of clearcuts during winter, the areas can still be used during summer and the spring-fall transition periods.

Comment: F-269

ww. Human caused disturbance, not winter range forage, is the factor most limiting deer and elk population size.

Response:

ww. The human disturbance factor is the one which has made the winter range situation so critical due in part to loss of good habitat through development. The improvement and management of winter range, including limitation of public use of roads and trails, should reduce both habitat and human caused stress on deer and elk herds.

Comment: F-107 W-107

xx. Improving summer range for deer and elk will not be effective if winter range quality currently limits their populations.

Response:

xx. Where winter range limits deer and elk populations, improving both winter and summer range quality will often be of more value than improving only winter range.

Comment: W-107

yy. Big game winter range improvements should be focused on the more productive sites to obtain the best return on investment.

Response: yy. The most productive winter range sites should be used for winter range improvement efforts. However, some productive sites may not be top priority due to adjacent private land development, or the need for improvement for a specific deer or elk herd.

Comment: F-269 zz Lodgepole pine should not be clearcut to the extent proposed, because it is currently very useful as deer and elk cover.

Response: zz. The Plan is aimed at improving diversity for wildlife by providing size and age class mixture. The current dense stands of lodgepole pine provide good cover but very little forage. Consideration of cover, forage and other habitat requirements of the Management Indicator Species will occur before cutting occurs.

Comment: F-109 F-269 F-312 aaa. The area west of Twin Lakes should not be 5B winter range emphasis due to its elevation, steepness, and rockiness

Response: aaa. This management area has been changed to Management Area Prescription 3A (semiprimitive nonmotorized recreation emphasis).

Comment: F-109 bbb. The Upper Box Creek area should not be a 5B winter range emphasis due to deep snows.

Response: bbb. This has been changed to the Management Area Prescription 4B which emphasizes habitat for Management Indicator Species.

Comment: F-303 ccc. Any assumption that logging will inevitably increase habitat diversity, and therefore improve wildlife habitat, is faulty.

Response: ccc. Because so much of the Forest is currently pole-sized or mature tree stands (over 90 percent), logging will be the primary means to help achieve habitat diversity objectives. Specific projects will be identified and implemented according to objectives for Diversity Units and Forest Direction and Management Area Prescriptions given in the Final Plan.

Comment: F-109 ddd. Development of a road into the Granite - Low Pass Gulch area will subject wintering deer to additional stress from probable ORV abuse.

Response: ddd. Since this area is a Winter Range Management Area emphasis (5B), road and travel management will be to prevent stress on big game animals (See Prescription 5B, Chapter III, Forest Plan).

Comment: F-257 F-303 F-338 F-343
eee. The FEIS should include a complete analysis of wildlife benefits, adverse impacts, and the relationships between wildlife, human activities and vegetation management.

Response: eee. Chapters III and IV of the FEIS have been expanded to better display impacts on wildlife habitat and wildlife, as well as habitat and human activity relationships.

Comment: W-411 W-415
fff. Wilderness designation and management will protect wildlife and wildlife habitat.

Response: fff. Wilderness designation and management should allow natural distribution, numbers and interactions of wildlife species, and allow natural processes to control wilderness ecosystems and their wildlife. In some cases, this may result in stable or increasing population numbers and in other situations this may result in lower population numbers than might be possible if more active habitat management were possible.

Comment: FW-8 W-415 W-416
ggg. The need to modify wildlife habitats in Wilderness Study Areas is insignificant, due to high elevation, marginal importance of National Forest winter range in WSA's and poor benefit-cost ratios of such projects.

Response: ggg. This is true for high elevation wildlife habitat areas.

13. LAW ENFORCEMENT

Comment: F-84 F-268
a. There is a need for better law enforcement through cooperative or volunteer programs. The Plan only nominally recognizes law enforcement.

Response: a. Discussions in the Plan have been expanded regarding the Forests' law enforcement program. See the section, Support Elements, Chapter II, Forest Plan. Management Requirements in the sections Forest Direction and Management Area

Prescriptions, Chapter III, Forest Plan also contain specific requirements relative to law enforcement.

14. GENERAL

Comment: F-308

a. Establish an on-going program of corner location, posting, and maintenance of Forest boundaries.

Response:

a. Corner location posting, and Forest boundary maintenance is a part of the property boundary location work identified in the Plan.

Comment: F-308 F-14

b. "No" land acquisition is too inflexible.

Response:

b. Alternative A (the Forest Plan) now provides for the acquisition of 50 acres of land annually. See the section, Resource Elements, Chapter II, Forest Plan. Also, see the section Scope of Issues to be Addressed and Changes Between the Draft and FINAL EIS. Chapter I, FEIS, for discussions regarding land acquisition.

Comment: F-343

c. Increasing public access is a major decision which needs to be justified in the EIS.

Response:

c. Increased recreation demands, fuelwood availability and big game winter range improvement needs are some of the resource management programs that will require access routes to National Forest System lands. This is the primary justification for providing more access.

Comment: F-308

d. Concerned that statement on first page of summary which reads, "no substantive change will be made in the Plan unless .... as a result of widespread public concern" will be misleading to public.

Response:

d. The statement simply informs people that we may not print an entire EIS if substantial changes are not required.

Comment: F-120

e. ORV enthusiast believes National Forests should be open for all people.

Response:

e. Lands allocated to emphasize ORV use have been increased. See Chapter III, Management Direction, Forest Plan and the Forest Plan Map.

Comment: F-184 W-684

f. Do not believe in commodity development for short term gain.

Response:

f. The analysis of alternatives looks out 50 years in the future. Analysis of tree management includes sustained yield management for 240 years. These long time periods are incorporated into the analysis process to assure short-term activities do not cause adverse long-term effects.

Comment: F-306

g. Use of existing transmission line corridors should not be mandatory.

Response:

g. This direction has been eliminated from the Plan.

Comment: F-343

h. Management of many resources were identical in all the alternatives. The EIS must explore the effects of significantly varying the management resources.

Response:

h. We agree. Management requirements to be implemented are the same for many resources in each of the alternatives. One of the primary differences between alternatives is where planned activities such as timber harvest or wildlife habitat improvement opportunities will occur. These kinds of developments differ between alternatives because of attempts to resolve issues and concerns about National Forest management in different ways. However, specific management practices (or the way activities are conducted) does not appreciably change between alternatives. This has been more fully explained in Resource Elements, Chapter III and in Direct and Indirect Environmental Effects in Chapter IV of the FEIS.

Comment: F-343

i. More detail on mitigative measures are needed. There are several aspects of the Plan that need clarification in regard to overall impacts and consequences of impacts.

Response:

i. Chapter IV, Forest Plan has been expanded to better identify mitigation and monitoring requirements of the Plan. The FEIS has been expanded and overall impacts anticipated of implementing the Forest Plan have been clarified. See Adverse Environmental Effects that Cannot be Avoided, Chapter IV, FEIS.

Comment: F-306

j. Do not approve any special use applications that can be reasonably met on private or other federal lands unless it is clearly in the public interest.

Response:

j. A special use application may be denied if the authorized officer determines that: the proposed use would be incompatible with the purpose(s) for which the lands are managed, or with other uses; it would not be in the public interest; the applicant is not qualified; the use would be inconsistent with applicable federal and State laws; and if the applicant cannot demonstrate technical or financial capacity (36 CFR 251.54(h)).

Comment: F-343

k. The inclusion of detailed analysis of the negative impacts is even more important if future EA's are to be tiered from this EIS.

Response:

k. The Final EIS provides additional information of anticipated negative impacts of implementing the Plan from that displayed in the Draft EIS. (See Adverse Environmental Effects that Cannot be Avoided, Chapter IV, FEIS.)

Comment: W-50

l. Terrain limits access to a substantial portion of San Isabel National Forest areas designated as wilderness. Therefore, such designation has little or no effect on the land.

Response:

l. Natural barriers limit access, that is true, however, wilderness designation insures protection and preservation of natural features.

Comment: W-50

m. Due to limited personnel it will be impossible to enforce restrictions in wilderness areas.

Response:

m. Enforcement of Forest Service restrictions, and State and Federal laws is a difficult task not only in wilderness but on all parts of the National Forest. It is not impossible, however, it is a responsibility the Forest Service endeavors to accomplish.

Comment: F-343

n. All alternatives provide for an increase in downhill skiing. Impacts on resources resulting from ski developments are not considered.

Response:

n. Discussions of impacts of downhill skiing have been expanded. (See Recreation section and Soils section in Chapter IV, of the FEIS.)

Comment: F-154

o. It is suspicious that so few people knew about the Forest Plan. "Why don't you make it public?"

Response:

o. See the section, Consultation with Others Between Draft and Final Environmental Impact Statements, this Chapter.

Comment: F-14

p. Transmission lines detract greatly from the natural scene. The less of these the better.

Response:

p. New utility corridor designation will be studied on a case-by-case basis. It will be consistent with the plans and programs of other agencies within the context of the standards and guidelines disclosed in the Rocky Mountain Regional Guide. Management Area allocations in each alternative identifies areas where utility corridor designation could be considered, areas to be avoided and areas where corridors are not permitted. For instance, utility corridors cannot be located in wilderness unless authorized by the President. Other areas where corridors are not compatible include Research Natural Areas and Wild and Scenic Rivers. Corridors should generally avoid the following management areas unless studies indicate that the impact of the corridor can be mitigated:

-Developed recreation sites and winter sports sites, Prescriptions 1A, 1B-1 and 1B-2.
-Prescription 3B emphasizing primitive recreation in unroaded areas.
-Riparian areas, Prescription 9A.
-Special Interest Areas and Municipal Watersheds, Prescriptions 10C and 10E.

Corridors may be considered for designation in all other management areas.

The Forest Plan Map can be used to identify areas of the Forest that are generally considered compatible with utility corridor designation. Also, areas that should be avoided and areas that are not compatible are also displayed by Management Area Prescription

Management Area Prescription 1D in Chapter III, Forest Plan provides management requirements for areas allocated to utility corridors.

Comment: F-272

q. I support an alternative that summons maximum use of our resources. This plan is blatantly

W-682
W-622

pro-development, and shows little consideration for protecting the Forest.

Response: q. The Forest Plan is multiple use management oriented and attempts to meet the various resource uses in accordance with demand, the capability of the land, and the compatiblity of various mixes of resource uses and services. Management Requirements in Chapter III of the Forest Plan provide the necessary consideration for and protection of all resource values on the Forest.

Comment: r. Oppose "Administration's" pressure to open up
F-12 public lands for development, timber cutting, and oil and gas exploration. Cannot afford to lose our recreation areas.

Response: r. The Forest Plan provides for maintenance and protection of all Forest resource values including recreational opportunities. The Plan provides a strong emphasis on wilderness, and the recreational opportunities this resource offers. Dispersed recreation opportunities including planned trail construction and reconstruction to access recreational areas are provided. The mix of resource development uses planned has been designed so that no one resource suffers irreparable harm at the expense of another.

Comment: s. Delay purchasing lands when too expensive.
F-14 Land exchange should reduce these costs.

Response: s. Forest Service policy regarding land purchase is to acquire where possible, from willing proponents, private land inholdings which would have a high benefit to the public. Usually these are isolated tracts, which, should they be developed (subdivided for homes), could adversely effect management programs on surrounding National Forest System lands. Land exchanges are used where they provide the best combination of benefits to both the government and private land holders.

The exchange of National Forest System land for an equal value of non-National Forest System land provides both the Federal Government and the exchange proponent an opportunity to consolidate ownership and obtain or convey lands which no longer serve

the purposes of exchange participants.

Land exchange opportunities do not always serve the needs of the landowner. There are some who prefer monetary compensation.

The ability to accommodate the cash needs of landowners became available to the Forest Service, September 3, 1964. Federal revenue from the sale of off-shore oil and gas leases, motorboat fuel taxes, sale of surplus government real and personal property, and entrance fees to recreation sites, made up this fund.

Monies from the fund were made available to land management agencies such as the National Park Service, Fish and Wildlife Service and Forest Service to acquire important tracts of land having a high value for public use and enjoyment and protect unique environments from possible development. The fund was not available to acquire general forested areas to consolidate ownership.

Since 1981, with few exceptions, fund monies have not been available. Therefore, land exchange is currently the most available method, to adjust the ownership of land within the National Forests. There is the possibility that important parcels of land, for example within wilderness areas, could be lost to development due to the lack of cash to purchase. At times, the Federal Government receives highly important parcels through a donation to the public by the landowner. There are also opportunities for persons or organizations to purchase such important tracts from the landowner and in turn exchange them for marketable National Forest System land classified for conveyance.

Acquisition of these publically important parcels will be made through any alternative available which serves the needs of the landowner. At the present time, land exchange is the most viable alternative.

15. SANGRE DE CRISTO WILDERNESS STUDY AREA

Comment: W-603

a. Request boundary be changed to exclude water collection ditch for the Montez Reservoir for maintenance purposes.

Response: a. The water collection ditch for the Montez Reservoir is outside of the area which is being recommended suitable for wilderness in the proposed action.

Comment: F-18, W-19, W-526, W-617

b. For the Sangre de Cristo WSA, timber values are unimportant compared to recreation, wildlife, watershed, and wilderness. There is no market or demand for timber produced in the above WSA.

Response. b. Timber values were considered in the cost benefit analysis of the Sangre de Cristo Wilderness Study Area. In addition to supplying wood fiber, timber harvest may be used to benefit wildlife, watershed, and the overall health and vitality of the Forest cover.

Comment: F-60; W-608, FW-7; W-523, W-525; W-427

c. Sangre de Cristo WSA should be all wilderness including boundary adjustments that include Venable, Comanche and Blance Peaks.

Response: c. The boundary, as recommended in the proposed action passes through Venable and Comanche Peaks. The boundary passes over Blanca Peak but bypasses the privately owned land which encompasses the summit.

Comment: L-15, L-11, W-684

d. 31,000 acres is too much of a boundary adjustment. How will boundary adjustment resolve conflicts? How many acres of private land would remain on the Rio Grande - 519 or 516 (pg. 27 and 86)?

Response: d. Boundary adjustments will help to resolve conflicts in a number of ways. Areas of significant resource use conflicts are removed as in areas where there are existing developments; high potential for minerals; established, existing motorized use; or important wildlife habitat areas which would benefit from nonwilderness management. Private land with existing or potential uses not compatible with wilderness management would be removed in some areas.

The acreage of private land remaining within the modified boundary recommendation is approximately 516.

Comment:
W-455
W-45
W-559
W-546
W-61
F-104
W-557
W-202
W-642
W-601
W-598
W-554

e. Do not want wilderness for Sangre de Cristos because:

- existence of private lands, unpatented mining existing access ways, and great potential for mineral discovery;
- future ski area in Urracca drainage on south section;
- inability to fight fires;
- do not have time to walk into area needs motorized access;
- too narrow to be effective;
- not needed for wilderness because of other representative land forms, vegetation, etc.;
- opposes Fremont, Huerfano, and Saguache County plans,
- potential loss of multiple use values;
- may need a power line over Sangres someday for cheap power (shortest route);
- is already wilderness in nature and does not need designation; and
- will eliminate motorbike trails and deprive a lot of people from seeing something beautiful.

Response:

e. - Private land tracts are relatively few in number and total only about 800 acres. In the modified boundary alternative, only about 400 acres would remain inside the area. Although exclusion of all private lands is ideal, further boundary modification would decrease the overall wilderness potential. Mineral potential and accessibility were considered in the overall study report.

- The Uracca drainage has not been inventoried as a potential ski area and has not been formally proposed.

- Wilderness designation does not preclude fighting fires. Section 4(d) of the 1964 Wilderness Act specifically permits actions to control fires.

- Motorized access is, for the most part not currently permitted. Overall there will not be a significant change. Alternative areas accessible to motor vehicles are widespread throughout the Forest.

- Less than 10 miles of primitive 4-wheel drive trails would be closed. These are generally unauthorized tracks improperly established

from repeated use or in some instances developed for mineral exploration.

- Narrowness does not affect the overall qualification of the area and is not sufficient to disqualify the area.

- Representation of landforms, vegetation, or wildlife is only one factor in establishing need. Availability to meet indicated demand is also considered.

- Fremont, Huerfano, and Custer County plans do not oppose wilderness. They are concerned with the resources and economic stability of their county. The study report has considered those concerns.

- Wilderness uses in themselves are recognized as legitimate uses and have been considered along with alternative uses. Potential resource uses and values have been compared.

- A powerline route over the Sangres might in specific routing circumstances be considered the most direct, however, neither existing nor forseen routes have been proposed. It is anticipated that future routing would follow the existing major transportation routes.

Comment: W-455 W-601 F-305

f. Because of the lack of specific information in the report, the economic efficiency equation may have been altered pro-wilderness.

Response:

f. The economic efficiency analysis is only an indicator for comparative purposes using assigned values. The result is not the deciding factor for or against wilderness recommendation.

Comment: FW-8 W-41 W-225 W-523 W-227

g. Sangre de Cristo should be all wilderness for the protection of wildlife, specifically:

- Areas suitability as big game winter range is poor because of overall high elevations.

- Bighorn sheep need isolation in order to reduce adverse stress.

- To protect ptarmigan year-round habitat.

- Vehicle use in any of these areas would have significant adverse effects on populations.

Response: g. Some of the lower slopes provide winter range opportunities. The Sangres WSA recommendation provides a balance of habitat needs for both bighorn sheep and ptarmigan.

Comment: h. Mineral interests have had 20 years to explore. Potential mineral areas are not a basis for deleting areas from wilderness designation.
L-15
W-38

Response: h. Changing technology in exploration and removal, along with changing demands and uses for minerals, can significantly effect the need for potential mineral reserves. Mineral potential in itself was not a determining factor but only one of several considerations.

Comment: i. Do not allow oil/gas and mineral exploration and development in Sangres because of:
FW-1; W-635 - Alteration of scenery; and
FW-5; FW-8 - Damage to water quality.
W-572; W-207
W-471; W-57
W-48; W-11
W-94; W-10
W-210; W-13
W-52; W-22
W-620;W-18
W-12; W-62
W-443; W-37
W-439; W-427

Response: i. National Forest System lands recommended suitable for wilderness are managed to protect the wilderness character until Congress acts. It is assumed that lands designated as wilderness will be withdrawn from all forms of mining activities subject to valid existing rights. Wilderness Study Areas not designated wilderness will be managed as other non-classified lands.

Mitigation to protect water quality would be accomplished in accordance with applicable laws and regulations and as provided in the Forest Plan.

Comment: j. Areas for habitat improvement should be mapped and motorized use should be shown as a negative influence on big game.
L-15

Response: j. Areas where habitat improvement projects are planned are identified See Appendix A, Forest Plan. Prescription 4B (see Forest Plan Map) Management Areas also display where habitat improvement management activities for Management Indicator Species will be emphasized.

Motorized use is recognized as a negative influence on big game under some circumstances. In areas not recommended suitable for wilderness measures necessary for eliminating or reducing the adverse affects on wildlife are prescribed.

Comment: L-15 k. Access to WSA is difficult and if future development is expected, road costs should be shown.

Response: k. Access was considered in the recommendations for the area and boundary modifications. Future uses of a specific area are not necessarily dependent on road construction for development. Where roads would be constructed, costs would be determined on a site specific basis for the appropriate standard of road.

Comment: L-15 l. It is unfair to imply that pest management is a function of land status. How much "integrated pest management" has occurred in the last 20 years under multiple use?

Response: l. Much of the forested land is in a mature and overmature age class. Under wilderness the overall age of stands will increase. The older stands are much more susceptible to insect and disease outbreaks. Vegetation treatment, including partial or clearcut, can improve the health and vigor of the Forest cover. This will reduce the susceptibility of the Forest to insect and disease outbreaks Prior to 1980 only about 3000 acres annually received vegetation treatment which would make these areas more resistant to insect and disease attack. Vegetation treatment and management forms the backbone of "integrated pest management".

Comment: L-15 W-13 m. ORV use is a consumptive use. You cannot allow maximum ORV use and still protect resources. Conflicts with ORV use does not justify denying wilderness designation.

Response: m. ORV use is recognized as a legitimate use of Forest land and is provided for in a balance with other uses. ORV use does not mean uncon-

trollable 4-wheel drive or motorcycle use. It includes that use which is restricted to designated, roads, trails, or routes as well as cross country travel if appropriate "Off-road" or "off-trail" cross country use is permitted only where the resources can be adequately protected. The term "Off-Road Vehicle" (ORV) refers to the design capability of the vehicle, not their unrestricted use (see Appendix B, FEIS).

Comment: L-15

n. If 537,092 acres on the Pike-San Isabel National Forests plus acreage on the Rio Grande National Forest are available for motorized use, why cut 31,000 acres from WSA?

Response:

n. Boundary adjustments were made for a number of reasons. Access for motorized recreation would change very little under the modified boundary recommendation from that which is currently allowed. Local roads constructed to meet specific resource needs, other than recreation, would be closed to recreation use and would be permanently closed once the specific resource need was completed.

Comment: L-15

o. Overuse of winter range could also result from motorized use.

Response:

o. It is recognized that overuse of deer or elk winter range may result from many causes under a variety of circumstances. The appropriate treatment must rely on a detailed analysis of each situation.

Comment: L-15

p. Where are "water projects" (page 95) located and how is maintenance of water rights (page 38) a nonconforming use?

Response:

p. Water yield can be increased by appropriate cutting measures in spruce/fir and lodgepole pine stands above 9,000 feet elevation. The projects would be those timber harvest or cutting activities which could be applied to those stands specifically designed to increase water yield.

Improvement or mechanized activities to develop water resources would be in conflict with the definition of wilderness as given in Section 2(c) of the Wilderness Act, and as such, would be considered a nonconforming use.

Comment:

q. Retain large areas of commercial Forest land

FW-6; W-668
W-475; W-36
FW-8; W-226
W-523

in wilderness to be maintained for representation of ecosystems and landforms.

Response: q. Approximately 190,469 acres out of the 222,642 acres available is recommended as suitable for wilderness designation. One of the major uses of wilderness is the study of natural ecosystems.

Comment: W-599 r. Sangre de Cristo area should be preserved because it has excellent aquatic research habitat.

Response: r. Numerous lakes and many miles of streams representative of the available habitat are included in the area recommended for wilderness.

Comment: W-200; W-661 W-660; W-658 FW-7; W-525 s. Please support wilderness designation for the entire Sangre de Cristo Wilderness Study Area, using conservationists' 245,000 acre boundary proposal.
F-301; FW-8; W-482; W-207; W-206; W-14; W-198; W-208; W-608; W-61; W-86; W-27; W-605; W-407; W-51; W-110; W-479; W-643; W-640; W-621; W-644; W-635; W-476; W-623; W-452; W-597; W-55; W-431; W-572; W-652; W-108; W-629; W-631; W-611; W-570; W-542; W-455; W-37; W-523; W-668; W-526; W-414; W-415; W-102; W-419; W-98; W-103; W-421; W-463; W-561; W-9; W-474; W-8; F-14; W-483; F-18; W-605; W-675; W-29; W-617; W-553; W-38; W-36; W-689; W-27; W-88; W-6; W-467; W-461; W-680; W-568; W-616; W-533; W-597; W-142; W-452; FW-1; W-552; F-258; W-21; W-22; W-19; W-16; W-56; W-59; W-462; W-94; W-441; W-426; W-428; W-99; W-404; W-619; W-618; W-530; W-439; F-64; W-682; W-671; W-449; F-60; W-653; W-532; W-111; W-625; W-477; W-634; W-613; W-417; W-411; W-670; W-97; W-211; W-226; W-519; W-683; W-430; W-210; W-400; W-93; W-62; W-63; W-664; W-622; W-470; W-475; W-227; W-226; W-450; W-456; L-16

Response: s. The Forest Plan (Alternative A) recommends wilderness suitability (for inclusion in the National Wilderness Preservation System) for 187,169 acres of the Sangre de Cristo Wilderness Study Area. This includes 61,657 acres of the San Isabel and 125,512 acres of the Rio Grande National Forest. Additionally, 3,300 of the 4,910 acres of U.S. Department of the Interior, Bureau of Land Management lands contiguous to the Sangre de Cristo Wilderness Study Area are recommended for wilderness designation. These contiguous lands consist of the Black Canyon, South Piney Creek, Papa Keal and Zapata Creek Wilderness Study Areas.

The entire Sangre de Cristo Wilderness Study Area includes: (1) San Isabel National Forest - 87,300 acres; (2) Rio Grande National Forest -

130,532 acres; and (3) contiguous Bureau of Land Management Wilderness Study Area's 4,910 acres. This totals approximately 222,742 acres.

The conservationist's proposal for the Sangre de Cristo Wilderness Study Area which expanded the size of the study area was considered, however, it was not evaluated in detail because the Forest Service does not have authority to study any alternatives outside of the current Wilderness Study Area boundary identified in the Colorado Wilderness Act of December 22, 1980, Public Law 96-560. Section 105(a) in the Act is specific in identifying the areas to be studied as those lands depicted on the June 1980 maps.

Section 107 in the Act has clear direction that the RARE II review and evaluation has been completed. As a result, there will be no additional National Forest System lands in the State of Colorado studied for the purpose of determining their suitability for inclusion in the National Wilderness Preservation System unless authorized by Congress. This refers to lands not currently designated as a Further Planning Area or Wilderness Study Area under the Act. See the section, Changes Between the Draft and Final EIS, Chapter I, for additional discussion of this issue.

Comment: W-611 t. In addition to the 245,000 acre proposed area, there are other areas that should be included, such as: last few miles of road and trail to South Colony Lakes and lands east of the head of the Huerfano River.

Response: t. See response immediately above.

Comment: FW-8 u. Maintenance of water ditches is not a problem in wilderness and should not be considered a conflict.

Response: u. We agree. It is not a problem and is not considered a problem.

Comment: v. Close all trails including Rainbow and Lake of the Clouds to vehicle use which adversely affects wildlife, scenery, water quality and primitive recreation.

Response: v. Trails in many instances are an important part of wilderness. They permit many visitors an opportunity to enjoy and travel within wilderness areas. However, travel on foot or horseback are the only methods of travel permitted in wilderness. Motorized travel is not allowed. This provides protection for wilderness values including wildlife, scenic and primitive recreation values as well as water quality.

Comment: W-532 W-670 W-427 w. Support Forest Service recommendation of 188,000 acres for the Sangre de Cristo.

Response: w. The Forest Service recommendation is for 187,169 acres.

Comment: W-653 W-597 x. Disagree with the Forest Service proposal to delete the Sangre de Cristo area from Colorado's wilderness area

Response: x. See responses above.

16. GREENHORN WILDERNESS STUDY AREA

Comment: FW-7 a. It is difficult to determine the consequences of mineral leasing (page 43 of Wilderness Study Area Report). Recommend the 697 acres proposed for leasing with surface occupancy in the no lease category to eliminate conflicts with wilderness resources.

Response: a. National Forest System lands recommended for wilderness are managed to protect the wilderness character until final decisions or designations are made. Only leasing with no surface occupancy stipulations is recommended in Wilderness Study Areas until such time as Congress acts. Recommendation for lease denials or withholding of consent will be made only after a site-specific analysis of the lease application area has been done. It is assumed that lands designated as wilderness will be withdrawn from all forms of mining activities subject to valid existing rights. Wilderness Study Area lands not designated wilderness will be managed as other non-classified lands.

Comment: FW-8 b. Boundary concerns on page 50 are exaggerated. Boundary will defend itself because of terrain.

Response: b. In most instances this is true, however it was not practical in all circumstances to follow major terrain features without deleting significant

areas. Posting boundaries is necessary at most access points regardless of terrain.

Comment: F-14

c. Recommend adding Badito Cone and area north, to the Greenhorn Wilderness Study Area.

Response:

c. Badito Cone is outside the Wilderness Study Area and therefore not a viable option under the law authorizing the WSAs. It was excluded originally under RARE II because of mining activity and the existing constructed access road into the area.

Comment: W-206 W-455 W-457 L-16

d. Against Forest Service proposal because:
- Mineral potential good but not included in analysis.
- Economic efficiency analysis unsound.
- Would be better under multiple use.
- Leave areas open for four wheel drive recreation.

Response:

d. The most recently available information for mineral potential was considered in the evaluations. The preliminary U.S.D.I., Bureau of Mines Report MLA-26-83 (1983) Mineral Investigation of the Greenhorn Mountain Wilderness Study Area did not indicate a significant occurrence of minerals to preclude a recommendation for wilderness designation. A copy of the report is found in Appendix I of the Forest Plan.

Economic analysis for this study area can be found in Appendix C, FEIS. Rationale for the Forest Service recommendation for this WSA regarding multiple-use and four-wheel drive vehicles is also included in Appendix C, FEIS.

Comment: FW-7; W-620 W-652

e. Want no activity in lands adjacent to Wilderness (buffer).

Response:

e. "Congress does not intend that designation of wilderness areas in the State of Colorado lead to the creation of protective perimeters or buffer zones around each wilderness area. The fact that nonwilderness activities or uses can be seen or heard from areas within the wilderness shall not, of itself, preclude such activities or use, up to the boundary of the wilderness area." (Colorado Wilderness Act, Section 110)

Comment: W-553; W-669; W-675 W-608; W-699; W-475

f. Support wilderness proposal for Greenhorn.

W-235; W-241; W-243;W-261; W-684; W-238;W-519; W-597; W-264;W-257; W-237; F-301;W-239; W-523; W-479;W-671; W-265; F-258;W-624; W-530; W-532;W-542; W-670; W-96;FW-8; W-452; W-111;W-411; FW-1; W-653;W-633; W-552; W-30;W-623; W-613; W-462;W-419; W-431; FW-7

Response: f. The Forest Service evaluated the Greenhorn Mountain Wilderness Study Area for its suitability as wilderness. The area's physical characteristics, availability, need and manageability were evaluated. Based upon this study, 22,300 acres are recommended for wilderness in the proposed action.

17. SPANISH PEAKS WILDERNESS STUDY AREA

Comment: FW-8; W-33 FW-7; L-16 W-543 W-684 W-544 W-548 W-540 W-625 W-20

a. Spanish Peaks Wilderness Study Area should be designated wilderness and oil and gas exploration and development excluded because:
- Oil and gas potential is extremely low over much of area due to basic geology of area.
- Irreparable damage to the pristine quality of the area and the unique geologic features.

Response: a. Unique geological features would be protected.
- A U.S.G.S. and Bureau of Mines Report indicates a low mineral resource potential for leasable minerals. A copy of this report is found in Appendix I of the Forest Plan.
- Recommendations for leasing where acceptable would provide stipulations to protect other resource values and visual quality.

Comment: FW-8

b. Patented claims within the Wilderness Study Area should be acquired to avoid future conflicts.

Response: b. Acquisition of private land and mineral rights including patented mining claims is possible in wilderness provided that funds are made available and the owner is willing to sell. Scenic or protective easements are also a possibility provided the owner is willing and funds are available. Costs of acquisition and potential loss of unrecovered minerals were not included in the economic efficiency analysis.

Comment: W-633 FW-8

c. Spanish Peaks Wilderness Study Area should be designated wilderness to protect the fragile soil and lower erosion potential from development.

Response:

c. Soil characteristics have been evaluated as a part of the study. Neither soil erosion nor suspended sediment production would be expected to increase significantly under proper management of the area as wilderness or non-wilderness.

Comment: W-265 FW-7

d. None of the Wilderness Study Areas are needed to meet timber demands (by Forest Service data), therefore Forest Service evaluation is in error.

Response:

d. The economic efficiency analysis has been adjusted to reflect this concern. Only local fuelwood needs are valued in the revised analyses of Wilderness Study Areas.

Comment: F-258

e. Economic analysis shown on pages 14 and 15 of the Spanish Peaks Wilderness Study Area Report was ignored in the final evaluation. Benefits for wilderness outweigh costs 2.95 to 1.38.

Response:

e. The economic analysis is only one part of the overall evaluation and values shown should be considered only for comparison purposes. Many benefits and costs can not be included in such an evaluation because of the lack of means to assign a value to them.

Comment: W-670 W-240 F-301 W-523 FW-7 FW-8 W-482 W-540

f. Spanish Peaks Wilderness Study Area should be managed as wilderness because:

- Forage management for a limited number of species is not the best use over the long run, rather for the islands of naturally occurring wildlife populations of the WSA.
- Minor boundary changes could protect the wilderness and still allow winter range manipulation.
- Scars that would take generations to repair is not worth the low volume of minerals in the area.
- The disturbance created by commodity development would be detrimental to wildlife.
- Should be managed as special wildlife habitat management area if not wilderness.

Response:

f. The management emphasis will be on semi-primitive nonmotorized recreation management which will generally provide for naturally occurring wildlife populations. While there are no forage

improvement projects currently planned, there is some potential.

Winter range could be excluded from the wilderness with a boundary modification.

Commodity development proposals will be evaluated on a case-by-case basis. Developments that would cause unacceptable disturbance to wildlife would be mitigated or not approved.

Under a recreation management emphasis wildlife habitat management will also be of high concern.

Comment: W-687; W-60 W-696; W-562 W-697; W-548 W-658; W-455 FW-8; FW-7 W-672; W-41 W-30; F-14 W-109; W-555 W-547; W-32 W-637; W-597 W-617; W-620 W-675; W-638 W-698; W-431 W-449; W-652 W-111; W-439 W-569; W-533 W-8; F-258 W-207; W-453 W-205; W-684 W-544; W-468 W-616; FW-2 W-623; W-566 W-530; F-64 W-531; W-553 F-60; W-419 W-613; W-542 W-671; W-97 W-682; W-57 W-532; W-96 W-653; W-518 W-195; W-411 W-58; W-462 W-683; W-16 W-607; W-668 W-608; W-479

g. Spanish Peaks Wilderness Study Area should be designated as wilderness because:

- The unique geologic features of the area need to be protected.
- The area is a great outdoor classroom for biological as well as geological features.
- Of their unique beauty.
- The recreational quality of experiencing climbing the peaks need to be pro cted.
- Designation as a National Landmark denotes but doesn't protect.
- "They are one of the only two peaks that runs east and west".
- The economic analysis shows a benefit/cost ratio of 3.17/1.38 in favor of wilderness.
- A network of 2-40 acre clearcuts on the slopes will seriously undermine the scenic resource.
- Local population pressures are increasing and there is a greater need for the solitude of wilderness close by.
- There is no demand for timber in this part of the state.
- There is no need to allow prospecting and resultant damage (road, drill pads) just to prove there was nothing there.
- All the commodities can be obtained somewhere else.
- Local tourist industry can use the increased dollars.
- Boundary adjustments could resolve whatever problems the private land might create.
- Need to prevent oil and gas leasing.

Response: g. The unique geologic features of the peaks and

National Natural Landmark would be protected under either wilderness or nonwilderness management.

Educational uses relating to the large scale, long-term ecological processes are generally dependent on a wilderness character. Such educational use, however, might also preclude concentrated recreation use, grazing or other recognized wilderness uses. Some educational uses, as in the study or teaching of the geology of the area might be enhanced by non-wilderenss management to provide for physical investigation, improved accessibility, or development of interpretive facilities. Often the value as an outdoor classroom is not dependent on wilderness classification but may be readily obtainable in other non-roaded, lightly used areas.

Retaining the unique beauty of the Spanish Peaks is not dependent on wilderness classification. Application of mitigation measures to protect and enhance visual qualities are prescribed in the management direction in the Forest Plan. Most of the area is to be managed to emphasize semi-primitive nonmotorized recreation.

The recreational quality of experiencing climbing the peaks is not dependent upon wilderness classification.

The characteristics and features for which the area was designated a National Natural Landmark are protected under management direction in the Forest Plan because of its recognition and designation.

The peaks are independent features not recognized as geologically unique because one lies east or west of the other. This relationsiip has no bearing on their qualification for wilderness.

The economic analysis has been revised to incorporate the latest interpretations. The relationship still shows a ratio in favor of wilderness. The values shown should be considered for comparison purposes. The result is not the deciding factor.

A network of clearcuts is not proposed nor contemplated for the slopes of the peaks. Some timber cutting would occur to accomplish

management objectives as set forth in the Forest Plan. Standards and guidelines assure vegetation management is coordinated to enhance other resource values and avoid long term adverse effects. Visual quality objectives are identified in the Forest Plan and are designed to maintain or enhance an overall visually appealing landscape.

Increasing population pressures and the need for wilderness is recognized. Within the surrounding locale, wilderness suitability is recommended for the Greenhorn Mountain and the major portion of the Sangre de Cristo Wilderness Study Areas. Currently there are over 53,000 acres of wilderness within 50 miles and another 966,000 acres within 100 miles. In addition, there are many nonwilderness opportunities for solitude throughout the Forest. Management emphasis other than wilderness will continue to provide significant opportunities for solitude.

Local demand for timber and wood products is not significant as it pertains to the wilderness study area. Timber cutting or vegetation management however may be prescribed for a number of purposes other than supplying timber products to meet local needs.

National Forest System lands recommended for wilderness are managed to protect the wilderness character until final decisions or designations are made. It is assumed that lands designated as wilderness will be withdrawn from all forms of mining activities subject to valid existing rights. Wilderness Study Area land not designated wilderness will be managed as other non-classified lands unless specifically precluded by Congress or other form of withdrawal from mining activities.

Forest-wide timber demands can be met outside of the study areas. However, other resources are indeed where you find them, such as minerals, oil and gas, and big game winter range.

Economic benefit to local areas is difficult to foresee. What may benefit one enterprise may foreclose opportunities for another enterprise. The economic analysis displayed in the Study Report shows only a limited scope of resource potential and does not relate to opportunity for local profit.

Boundary adjustments would provide some measure of reducing private land conflicts. As much as 600 acres of the 870 acres might be reasonably excluded by boundary adjustment. Neither quality nor manageability of the area would be improved however.

It is assumed that a designation of wilderness will withdraw the study area from all forms of mineral activity. National Forest System lands not classified as wilderness will be managed as all other multiple-use, non-classified lands. Until a decision or designation has been made by Congress, the wilderness Study Area will be managed to protect the wilderness character.

Comment: FW-7; FW-8 W-653; W-195 W-555; W-543 W-682; W-431 W-533; W-518 W-8; W-449 W-531; W-530 W-468; F-64 W-453; W-96 W-97; W-111

h. Why during RARE-II was the area given a rating of 20, then later the rating was dropped to 16? What additional knowledge surfaced that did not during RARE-II?

Response:

h. The RARE II - WARS assessment did not fully consider the extent of existing improvements such as the Bulls Eye Mine and the feasibility of closure and rehabilitation. The outstanding opportunity for solitude and for primitive and unconfined recreation were reconsidered. Absence of an outstanding opportunity for solitude, area size, concentrated use areas, and lack of screening from outside influences were major factors in the final determination.

Comment: W-601 W-202

i. Area should not be wilderness because of mineral potential and pending leases.

Response:

i. Mineral potential is considered in determining a recommendation of suitable or unsuitable for wilderness designation.

Known and potential mineral value, and pending leases for mineral exploration and development are one of the many resources that are analyzed and evaluated in this planning effort in determining the Forest Service recommendation for a Wilderness Study Area regarding suitability for inclusion in the National Wilderness Preservation System.

Comment: FW-8

j. Patch clearcutting will increase water yield negligibly while increased runoff in the spring is not needed.

Response:

j. We agree that small clearcuts increase water yield to a small degree when considering the total amount of water currently produced from the Forest. However, demand for water currently exceeds supply and all water produced from the Forest will be used.

18. BUFFALO PEAKS WILDERNESS STUDY AREA

Comment: W-555

a. The Forest Service interim Upper Arkansas Plan directly conflicts with the study area report in relation to the need for habitat improvement within the Buffalo Peaks Wilderness Study Area in order to increase populations of big game species.

Reponse:

a. This has been corrected. Additional discussion has been included in the Buffalo Peaks Wilderness Study Area report addressing this concern. See Appendix C.

Comment: F-343 FW-3

b. Proximity to wilderness is listed as a reason for denying wilderness designation for Buffalo Peaks. DEIS does not specify distances to nearest wilderness.

Response:

b. Maps showing other wilderness within the Forest and proximity to Wilderness Study Areas are in Appendix C, FEIS.

Comment: W-418; FW-7 FW-3; F-274 W-672; W-683 W-42; W-675 FW-9; W-652 W-608; W-461 W-576; W-475 W-643; W-443 W-111; W-555 FW-8; **F-109** F-136; F-214 W-98; W-16 W-566; W-518 FW-2; W-542 F-14; W-553 W-472; W-8 W-57; W-569 W-97; W-530

c. Buffalo Peaks Wilderness Study Area should be wilderness because:

- One of few volcanic land forms that has wilderness protection in Colorado.
- The beauty of the area will be severely compromised by any development.
- It is needed as is, for wildlife habitat.
- Cost/benefit analysis +2.5 for wilderness.
- There will be increased demand for wilderness characteristics as Front Range population increases.
- Its suitability hasn't changed since RARE II.
- The local economies need the dollars that wilderness would generate.
- All commodities to be obtained within WSA may be obtained elsewhere.
- Forage manipulation for the benefit of a limited number of species is not the highest and best use in the long-term.

W-142; W-449
W-680; W-58
W-439; W-479
F-64; W-96
W-531; W-419
W-468; W-684
W-462; W-532
F-201; W-417
W-625; W-477
W-453; W-671
W-670; W-27
W-431; W-411
F-60; W-668
L-16; W-574

- Minor boundary adjustments (200 ac) would eliminate conflict with mines.
- The United States Forest Service bias for consumptive uses of public lands emerges in spite of the results of its own decision criteria which indicate non-consumptive uses, would benefit more forest users more over a longer period of time and at lower administrative cost.
- Area is not highly mineralized.
- Timber and fuelwood production do not justify retention in multiple uses.
- Proposed timber cutting and oil and gas development would do irreparable damage and leave scars on the landscape.
- Possibility of unique grassland ecosystem existing in the WSA which needs protection.

Response: c. As a result of public input and reconsideration of values, 36,060 acres of the area are being recommended for wilderness classification.

The Buffalo Peaks are volcanic in origin but this is not recognized by geologists as a significant unique characteristic requiring wilderness designation for recognition or preservation.

Where development would occur, whether in non-wilderness areas or by activities allowed by the Wilderness Act within wilderness, mitigation measures to protect visual, as well as other resource values would be applied as directed in the Forest Plan.

Wildlife habitat can be improved by vegetative treatment under nonwilderness management in applicable areas. The big game winter range is of major importance and must be managed through vegetative treatments.

The economic efficiency analysis is only one of many factors in the overall evaluation of the area. The analysis included a limited number of specific resources; timber, range, water and recreation.

Demand for wilderness characteristics are expected to increase with population pressures. Demand for non-wilderness opportunities and resources is also increasing.

Suitability for wilderness designation has

been considered in the overall context of the Forest Plan.

It is not known in any specific case whether the local economies would benefit most from wilderness or nonwilderness.

Vegetation management for habitat improvement is usually aimed at one species. Although such may be the case in some specific winter range situations, a wide variety of species will also benefit. This is the reason for utilizing management indicator species.

Exclusion of existing patented mining claims were considered in the modified boundary recommendation. However, unpatented mining claims were not considered.

Cost benefit is one of the considerations in the overall study. The economic efficiency analysis is an indication for comparative purposes only and included a limited number of resources. Its results however, do not indicate a bias for consumptive uses.

Comment: W-576 W-680 FW-8

d. Buffalo Peaks should be designated wilderness because it's minimal for timber and should be protected from vehicle abuse and the potential increase of recreation use to 168,130 RVD's.

Response:

d. Although timber considerations might be thought of as "minimal" the long term sustained yield is still significant. Some of these concerns are acknowledged in the modified boundary recommendation. The recreation use capacity is a maximum estimated capacity. Under the Forest Plan, management of the nonwilderness portions would not include motorized recreation activities. Roads developed for resource management purposes, would be closed when no longer needed.

Comment: W-455 W-203

e. Buffalo Peaks is unsuitable for wilderness because its natural integrity is compromised and retention of access to public lands is important.

Response:

e. Those areas where impacts most significantly affect the natural integrity have been excluded in the modified boundary recommendation.

Comment: FW-7

f. How were the local concerns related to protecting the mining industry and other economic concerns surveyed? Arguments are weak.

Response:

f. Mineral potential was considered in the modified boundary recommendation. Wilderness recommendations were considered as alternatives within the development of the Forest Plan, which responded to the public issues and management concerns.

Comment: FW-8

g. Adjust the boundary in Salt Creek drainage to exclude the two patented claims and this will resolve the conflict.

Response:

g. The recommended boundary was adjusted to eliminate the two claims.

Comment: W-555 W-682 F-274 F-8

h. Since there has been no change in the information for minerals since RARE-II, the original recommendations should stand.

Response:

h. Mineral potentials have been brought up to date showing indicated changes. Since RARE II, a mineral resource potential evaluation was done by the U.S. Geological Survey, Department of Interior. A copy of the report is found in Appendix I of the Forest Plan.

Comment: W-601 W-455

i. Buffalo Peaks Wilderness Study Area should not be wilderness because:
- -Mineral potential is high to moderate; and
- -Mineral potential is not included in evaluation.

Response:

i. Mineral potential as presented in the Study Report is considered in arriving at the recommendation for suitability. It was not included in the economic efficiency analysis because specific minerals and quantities are not known.

Comment: F-258

j. Forest Service is ignoring their own cost efficiency analysis for managing the Buffalo Peaks Wilderness Study Area, i.e., managing as wilderness 2 to 3 times cheaper than for commodities.

Response:

j. The economic efficiency analysis is only one of several considerations in determining suitability.

Comment: W-555 FW-8

k. The miniscule amount of water yield increase (0.5%) for Buffalo Peaks Wilderness Study Area does not justify a finding of non-availability for wilderness, especially when the impacts would be so great.

Response: k. Water yield increase, as with other resource values is only one of many considerations in determining suitability.

Comment: W-665 W-596 FW-9 FW-7 F-170 W-555

1. Buffalo Peaks Wilderness Study Area should be designated wilderness from a wildlife standpoint because:
   - -Wilderness should be conducive to natural selection in the wildlife chain;
   - -ORV use has been detrimental to the Bighorn herds in the past;
   - -The area is already diverse and needs no timbering to help;
   - -Big game research shows that escape cover and not forage is needed most in east slope Colorado;
   - -All commodity producing activities will be detrimental to habitats for Bighorn, deer, and elk; and
   - -Winter range will not be improved because most of WSA is above usable winter range. Wildlife reproduction may not be compatible with oil and gas developments.

Response: 1. Although some species of wildlife would benefit from wilderness management, none of those present in the Buffalo Peaks area are dependent on such designation. Nevertheless, 36,060 acres are being recommended for wilderness.

The major portion of the area is being recommended for wilderness. On the remaining portion, motorized use will be permitted only for specific management purposes after wildlife concerns are identified, as provided in the Forest Plan.

Appropriate vegetation treatment is needed to maintain diversity as well as to treat specific stands identified as suitable for treatment.

National Forest winter range is especially important to deer, elk, and bighorn sheep as adjoining private lands become unavailable due to development. Management practices through vegetation treatment to improve or maintain winter range are possible under a nonwilderness alternative.

This is not necessarily so with proper management and mitigation, habitats can be improved. In fact, vegetative management in 4B and 5B areas will be specifically designed to benefit wildlife.

The winter range is predominantly in the portion recommended for nonwilderness. Winter range is important because it is being lost on private land due to development.

Wildlife protection is given appropriate consideration as necessary in all lease proposals. Calving and nesting areas and other critical wildlife habitats are protected with Limited Surface Use Stipulations, (FS, R-2 Supp. C to Form 3109-3) Refer to Appendix F of the Forest Plan.

National Forest System lands recommended for wilderness are managed to protect the wilderness character until final decisions or designations are made. It is assumed that lands designated as wilderness will be withdrawn from all forms of mining activities subject to valid existing rights. Wilderness Study Area lands not designated wilderness will be managed as other nonclassified lands unless specifically precluded by Congress or other form of withdrawal from mining activities.

Comment: W-523 W-555

m. Area should be managed as wilderness or as a special wildlife habitat management area for Bighorn sheep, mule deer and elk maintaining the area in an unroaded backcountry condition.

Response:

m. Wilderness designation is recommended for 36,060 acres. The non-wilderness portion would be managed under the Forest Plan primarily for wildlife emphasis and for semiprimitive nonmotorized recreation purposes. Roads needed for specific management purposes would not be open for recreation purposes and would be closed when no longer needed. Which is true?

Comment: W-555 F-301 F-60 FW-8 W-658

n. Two years ago, the Forest Service obviously believed that Bighorn sheep numbers could be tripled, deer doubled, and elk increased by 30 percent in the Buffalo Peaks even if designated wilderness. Now Forest Service claims Buffalo Peaks Wilderness Study Area is not available for wilderness because it is needed for wildlife management.

Response:

n. Habitat needs are only one of several considerations in arriving at the recommendation for the Buffalo Peaks Wilderness Study Area. The recommendation was developed in the context of the Forest Plan and considers the overall Forest and area needs for wildlife habitat. It has used the most recent vegetation typing data for habitat

identification which was not available for previous planning. The Forest Plan has been adjusted to recommend 36,060 acres of the area for wilderness designation.

Comment: F-274 W-684

o. Go for wilderness but alter northwest corner boundary to provide for elk herd and elimination of wilderness conflicts (old roads).

Response:

o. The Forest Plan has been adjusted to provide for recommendation of 36,060 acres of the Buffalo Peaks Wilderness Study Area for wilderness designation. The northwest corner of the area is not included in the recommended portion. Mineral potential, old roads, fuelwood needs, and wildlife habitat needs were a part of the reasons for the recommendation.

Comment: F-343

p. The simplified view of wildlife habitat management makes management directly conflicting with Wilderness designation. Possible merits to the wildlife resource by protection from development are not even considered. Appendix C shows essentially no habitat improvements possible with wilderness designation. This evidences the Plan's preoccupation with timber harvesting as a management tool.

Response:

p. The discussion of wildlife habitat management has been expanded in the Wilderness Study Area reports. See Appendix C, FEIS. Within wilderness, projects such as vegetation management to enhance habitat diversity, are not generally undertaken because they have to be done with hand tools.

Comment: FW-9

q. The Forest Plan does not adequately analyze nonmotorized dispersed recreation demands vs. developed recreation demands. It fails to properly predict demands for primitive non-motorized recreation and the ability of the Forest to provide it.

Response:

q. These discussions and analysis have been expanded in the Forest Plan and Final Environmental Impact Statement. See Resource Elements, Chapter II, Forest Plan and Benchmark Analysis, Chapter II, Recreation under Resource Elements, Chapter III, and Recreation, Chapter IV, FEIS.

19. LOST CREEK FURTHER PLANNING AREA

Comment: W-692; W-675 W-30; W-684 F-301; W-671 F-258; F-18 W-453; W-195 W-431; W-683

a. Consider Lost Creek FPA for wilderness designation with boundary modifications.

Response:

a. Prior to the Colorado Wilderness Act, Congress reviewed the entire RARE II area, and as a result designated the currently existing wilderness boundary. Boundary modification opportunities to provide for portions of the study area to be included in the wilderness were explored. Any boundary modifications were determined to be in conflict with existing nonconforming features. Some of which are approximately 19 miles of old logging roads, 600 acres of recent logging activity, a radio repeater site, 60 acres of tree plantations and evidence of past mining activity.

Comment: W-482; W-568 W-569; W-417 W-51; W-668 W-411; F-258 W-608; W-517 F-14; W-468 W-530; W-195 W-31; W-683 FW-9; W-431 W-675; L-16

b. Lost Creek needed for wilderness because:

-it will provide solitude close to Front Range cities;
-the economic benefit far exceeds the value of development;
-it will open wild and beautiful country; and
-we need all the solitude areas we can get.

Response:

b. Location in respect to other wilderness available in the locale as well as the attributes offered by the area were considered. There are approximately 770,000 acres of wilderness within 50 miles of the Study Area. Over 250,000 acres are within 50 miles of downtown Denver. Within 100 miles of the Study Area, there are approximately 1,568,800 acres of wilderness, 937,000 acres of which are within 100 miles of Denver. Those considerations, along with the low attribute ratings (WARS=14), indicate the area is not needed for wilderness. The WARS Rating for outstanding opportunity for solitude was moderate. In addition, nonwilderness opportunities for solitude and escape from urban pressures are widely available on other National Forest System land throughout the Forest and adjoining Forests.

Comment: W-669; W-692 W-668; W-675

c. Feel Lost Creek FPA should have been included in the DEIS. It is probably also illegal that the Forest Service does not consider wilderness designation in any alternative for Lost Creek Further Planning Area. We found it rather disappointing that the Lost Creek Further Planning Area was not even considered as worthy of a Draft Environmental Impact Statement. This is a blatant disregard of the NEPA process.

Response:

c. The Lost Creek Further Planning Area was studied in the overall framework of the Forest Plan and is displayed in a separate Further Planning Area Report. The report was summarized in the Draft EIS for the Forest Plan. This report has been expanded with additional discussions of Forest Service rationale for the recommendation for the Further Planning Area. Wilderness designation was considered for the entire Lost Creek Further Planning Area in the report alternatives and in Alternative C in the FEIS for the Forest Plan. The revised Study Report has been included in Appendix C to this EIS.

Comment: W-666; W-31 W-463; W-441

d. Do not allow timber cutting in Lost Creek Further Planning Area.

Response:

d The Lost Creek Further Planning Area has been studied within the overall context of the Forest Plan. All potential uses of the area including wilderness, timber harvest, or wildlife habitat, for example, were considered. The area has been determined to be not suitable for wilderness designation. Timber harvest for wood fiber production, wildlife habitat, overall stand improvement, or numerous other purposes is an integral part of the Forest Plan. Appropriate harvest practices may be applied as provided in the management direction and prescriptions of the Forest Plan, to consider resource needs, effects, and necessary mitigation. To unconditionaly disallow timber cutting would be in opposition to the management efforts developed in the Forest Plan.

Comment: W-441 F-201 W-31

e. Prohibit oil and gas development in Lost Creek Further Planning Area

Response: e. The Forest Planning process considered the question of oil and gas leasing. All National Forest System lands recommended for wilderness or further planning are managed to protect the wilderness character until final decisions or designations are made. It is assumed that lands designated as wilderness will be withdrawn from all forms of mining activities subject to valid existing rights. Wilderness Study Area lands not designated wilderness will be managed as other nonclassified lands unless specifically precluded by Congress or other form of withdrawal from mining activities.

20. WILDERNESS STUDY AREAS (GENERAL)

Comment: L-15 W-107 a. Forest Service idea that proximity of WSA determines suitability is not valid.

Response: a. The term "suitability" as used here refers to the area's suitability for designation, not suitability as to its wilderness attributes.

Comment: W-641 F-307 F-258 b. Disagree with Forest Service that it is necessary to delete entire study areas and large tracts of land (Sangre de Cristos) for wildlife winter range. Because most is in higher elevations.

Response: b. Wildlife winter range is only one supporting reason for recommending against wilderness. Lack of winter range has been identified as a major concern on this Forest.

Comment: F-307; W-244 W-247; W-252 W-234; W-693 W-242; W-260 W-678; W-263 W-232; W-258 W-446 c. Keep as wilderness to save the animals.

Response: c. National Forest management which includes wilderness area management is aimed at wise use and conservation of all resources. The Plan provides a balance of wilderness habitat and nonwilderness where habitats may be improved for a variety of wildlife species.

Comment: W-532 d. Large animals, bear, mountain lion, and elk depend on large undisturbed territory for survival.

W-256
W-253
W-248

Oppose timber cutting and oil and gas development (in wilderness).

Response: d. The Plan provides large areas of undisturbed habitat, including areas within wilderness and Wilderness Study Areas. Oil and gas development (exploration for and development activities) is not permitted within wilderness except for leases that were valid prior to midnight, December 31, 1983. Timber harvest activities are not permitted within wilderness.

Comment: e. Opposed to actual or potential infringement on the maintenance of existing, legally adjudicated water rights in WSA.
F-258
W-646
W-50

Response: e. Prospecting for water resources and the establishment of new reservoirs, water-conservation works, power projects, transmission lines, and other facilities needed in the public interest and the subsequent maintenance of such facilities, persuant to Section (4)(d) (4)(1) of the Wilderness Act will be permitted when and as authorized by the President. Access to, and maintenance of existing facilities or improvements would be permitted under such conditions and access routes or modes consistent with and reasonably necessary to preserve the wilderness.

Comment: f. Conflicts between WSA preservation and timber production do not exist. Forest-wide timber potential is more than twice demand with all WSA's as wilderness. (See total National Forest operative supply).
FW-8

Response: f. The Forest Service does not recognize the term "National Forest operative supply". The output figure qualified is "maximum resource output" and is projected as a benchmark for comparison purposes. This output is the yield which could be obtained if capable and available lands up to 70 percent slope were managed for timber production. While technologically it is possible to produce timber on these lands there is no forecast for this being likely during the period of this Plan, if ever. The only conflicts between timber production and wilderness study areas are the very local demands

Comment: W-103; W-98 W-414; W-93 W-57; W-110 W-624; W-97 W-416; W-52; W-263; W-516; W-458; F-32, W-626, W-266; W-537; W-658; W-656; W-466; W-527; F-21; W-678; W-259; W-685; F-214; W-623; W-198; W-517, W-676; W-246; W-249; W-471; W-614, W-649; F-301; W-426; W-29; W-622; F-17; F-164; W-569; W-422; W-1; W-459; W-206; W-535; FW-7; W-95; F-14; W-227; W-660; W-434; W-40; W-196; F-308; W-616; W-245; W-236; W-30; W-56; W-692; F-58; W-567, W-244; W-556; W-58; F-33

g. To compromise unspoiled lands for short-term economic gain would be detrimental to society. The demand for total wilderness for study, research and recreation increases as populations increase.

Response: g. The area has been studied in the context of the overall Forest Plan and considers long-term sustained benefits not just short-term economic gains. Availability and need for the area as wilderness considered all potential uses and allocation of resources.

Comment: W-640; W-35 W-78; W-39 W-113; W-429

h. It is imperative that these areas remain protected from development and deterioration.

Response: h. The overall potential benefit of the area with associated development was considered along with the potential benefit as wilderness. Nonwilderness management does not necessarily depend on development. Nor does wilderness designation assure "protection" from deterioration.

Comment: W-646

i. Wilderness supports and aids local economies through tourist and visitor trade.

Response: i. Wilderness may support and aid local economies through tourist and visitor trade in some instances however, the opposite may also be true.

Comment: W-461 W-646 W-564 W-108 F-307

j. The Plan is neither balanced nor forward looking because it slights wilderness designation and emphasizes short-term gains from oil and gas drilling and timber production. Commodities can be produced outside Wilderness Study Areas where real potential exists.

Response: j. The entire Forest can and does produce a wide range of commodities and benefits. In some cases the more productive sites do occur in Wilderness Study Areas. Within the framework of the Forest Plan, study areas were considered for both wilderness and nonwilderness potentials to determine which sources might best meet the anticipated need for the resources.

Comment: W-538 W-658 F-59 W-674

k. Designated wilderness have greater economic value than when exploited for their resource values.

Response:

k. The economic efficiency analysis is only an indicator for comparative purposes using assigned values. Actual economic values may never be known as in the potential of undiscovered mineral values. Values would depend on the nature and value of the other resources and the circumstances at the time.

Comment: W-107 W-573 W-100 W-637 W-668

l. Undeveloped lands tend to have many resource values such as:

- high water quality
- wildlife and plant habitat
- community protection
- non-motorized recreation
- undisturbed ecologic, zoologic, scenic features for educational and scientific benefits
- livestock forag

These resources are produced with minimal investment. Recommend that roadless management be a priority in Forest Plans.

Response:

l. Resource values of undeveloped lands are recognized. The Forest planning process weighs those values against the Forest-wide ability to meet the needs and demands for goods and services considering all resources. In addition to wilderness, substantial areas would remain undeveloped under other management prescriptions in the Forest Plan.

Comment: W-425; W-447 W-100; W-56 W-89; W-668 W-639; W-691;W-79; W-81; W-83; W-85; W-3; W-80; W-82; W-84; W-2; W-54; W-200; W-476; W-400; W-198; W-451; W-442; W-436; W-424; W-406; W-401; W-209; W-201; W-413; W-15; W-199; W-917; W-194; W-192; W-193; W-114; W-115; W-117; W-118; W-110; W-88; W-119; W-120; W-121; W-123; W-124; W-125; W-403; W-420; W-432; W-694; W-524; W-435; W-444; W-445; W-521; W-408; W-409; W-430; W-112; W-268; W-606; W-628; W-269; W270; W-271; W-272; W-273; W-274; W-275; W-276; W-277; W-535; W-30; W-278; W-279; W-280; W-281; W-282; W-283; W-284; W-285; W-286; L-13; F-9; W-287; W-288; W-289; W-290; W-291; W-292; W-293; W-294; W-295; W-16; W-107; W-296; W-297; W-298; W-299; W-300; W-301; W-302, W-303; W-304; W-437; W-664; W-305; W-306; W-307; W-308; W-309; W-310; W-311; W-312; W-313; F-18; W-485; W-314; W-315; W-316; W-317; W-318; W-319; W-320; W-321; W-322; W-99; W-91; W-323; W-324; W-325; W-326; W-327; W-328; W-329;

m. Protest oil and gas development and timber activities in all the WSA's because it would destroy beauty and continuity of the State of Colorado.

W-330, W331; W-659; W-46; W-332; W-333; W-334; W-335; W-336; W-337; W-338; W-339, W-340; W-108; FW-6; W-341, W-342; W-343; W-344; W-345; W-346; W-347; W-348; W-349; W-532; F-263; W-350; W-351; W-352; W-353; W-354; W-355; W-356; W-357; W-358; W-250; W-679; W-359; W-360; W-361; W-362; W-363; W-364; W-365; W-366, W-367; W-536; W-29; W-368; W-369; W-370; W-371; W-372; W-373, W-374; W-375; W-376; W-641; W-198; W-377; W-378; W-379; W-380, W-381; W-382; W-383; W-384; W-385; W-690; W-208; W-386; W-387; W-388; W-389; W-390; W-391; W-392; W-393; W-394; W-665; W-27, W-395; W-396; W-397; W-398; W-399; W-64; W-65; W-66; W-67; W-68; W-26; W-63; W-69; W-70; W-71; W-72; W-73; W-74; W-75; W-76; W-77; W-126; W-127; W-200; W-678; W-128; W-129; W-130; W-131; W-132; W-133; W-134; W-135; W-136; W-681; F-258; W-137; W-138; W-139; W-140; W-141; W-142; W-143; W-144; W-145; W-42; W-670; W-146; W-147; W-148; W-149; W-150; W-151; W-152; W-153; W-154; W-41; W-542; W-155; W-156; W-157; W-158; W-159; W-160; W-161; W-162; W-163, W-467; W-545; W-164; W-165; W-166; W-167; W-168; W-169; W-170; W-171; W-172; W-173; W-174; W-175; W-176; W-177; W-178; W-179; W-180; W-181; W-182; W-183; W-184; W-185; W-186; W-187; W-188; W-189; W-190, W-191; W-212; W-213; W-214; W-215; W-216; W-217, W-218; W-219; W-220; W-221; W-222; W-223; W-224; W-225; W-104; W-105; W-627; W-438; W-97; F-63; W-254; W-92; W-5; W-206; W-528; W-6; W-211; W-207; F-28; W-457; W-464; W-520; W-529; W-541; W-662; W-663; W-688

Response: m. It is assumed that lands designated as wilderness will be withdrawn from all forms of mining activities subject to valid existing rights. All forms of mineral development, timber harvest, road building, and other activities incompatible with maintaining the Wilderness Study Areas's potential for wilderness designation would not be permitted until such time as Congress has acted on the recommendation for wilderness or nonwilderness. Wilderness Study Area lands not designated wilderness will be managed as other non-classified lands.

Comment: n. Strongly support 1979 RARE II recommendations of wilderness for all Wilderness Study Areas. Do not understand what changes were made since the original RARE II.
W-666; W-667
W-669; W-664
W-608; FW-1
W-697, W-687; W-447
F-211; W-560; W-565; W-83; W-84; W-85; W-408; W-409; W-112; W-2; W-3; W-255; W-536; W-694; W-200; W-198; W-451; W-442; W-436; W-424; W-406; W-623; W-5; W-42; W-401; W-209; W-201; W-199; W-197; W-194; W-192; F-289; W-407; FW-3; W-193; W-114; W-115; W-117; W-118; W-119; W-120; W-79; W-208; W-448; W-121; W-122; W-123; W-124; W-125; W-403; W-420; W-402; W-600; W-457, W-432; W-435; W-444; W-445; W-521; W-268; W-269; W-27; F-257; W-474; W-270; W-271; W-272; W-273; W-274; W-275; W-276; W-606; W-14; W-210; W-277; W-278; W-279; W-280; W-281; W-282; W-283; W-671; W-195; W-6; W-283; W-285; W-286, W-287; W-288; W-289; W-290; W-467; W-11; W-290; W-291; W-292; W-293; W-294; W-295; W-296; W-7; W-641; W-486; W-63; W-297; W-298; W-299; W-300; W-301; W-302; W-303; W-679; W-483; W-304; W-305; W-306; W-307, W-308; W-309; W-310;

W-259; W-677; W-481; W-311; W-312; W-313; W-314; W-315; W-316; W-317; W-412; W-86; W-532; W-318; W-319; W-320; W-321; W-322; W-323; W-324; F-258; W-639; W-91; W-325; W-326; W-327; W-328; W-329; W-330; W-331; W-463; W-107; W-430; W-332; W-333; W-334; W-335; W-336; W-337; W-339; W-101; W-80; W-450; W-340; W-341; W-342; W-343; W-344; W-345; W-346; W-695; W-81; W-100; W-347; W-348; W-349; W-350; W-351; W-352; W-353; W-46; W-7; W-670; W-354; W-355; W-356; W-357; W-358; W-359; W-360; W-568; W-110; W-36; W-361; W-362; W-363; W-364; W-365; W-366; W-367; W-441; W-655; W-87; W-368; W-369; W-370; W-371; W-372; W-373; W-374; W-484; W-404; W-254; W-375; W-376; W-377; W-378; W-379; W-380; W-381; FW-8; W-534; W-82; W-382; W-383; W-384; W-385; W-386; W-387; W-388; W-454; W-456; F-307; W-389; W-390; W-391; W-392; W-393; W-394; W-395; W-396; W-397; W-398; W-399; W-64; W-65; W-66; W-67; W-68; W-69; W-70; W-71; W-72; W-73; W-74; W-75; W-76; W-77; W-126; W-127; W-128; W-129; W-130; W-131; W-132; W-133; W-134; W-135; W-136; W-137; W-138; W-139; W-140; W-141; W-142; W-143; W-144; W-145; W-146; W-147; W-148; W-149; W-150; W-151; W-152; W-153; W-154; W-155; W-156; W-157; W-158; W-159; W-160; W-161; W-162; W-163; W-164; W-165; W-166; W-167; W-168; W-169; W-170; W-171; W-172; W-173; W-174; W-175; W-176; W-177; W-178; W-179; W-180; W-181; W-182; W-183; W-184; W-185; W-186; W-187; W-188; W-189; W-190; W-191; W-212; W-213; W-214; W-215; W-216; W-217; W-218; W-219; W-220; W-221; W-222; W-223; W-224; W-225; W-104; W-105; W-686; W-206; W-476; W-96; W-88; W-207; W-99; W-415; W-34; W-400; W-421; W-102; W-29; W-558; W-661; W-211; W-251; W-470; W-267; W-47; W-571; W-317; W-315; W-649; W-628; W-630; W-637; W-640; W-636; W-567; F-30; W-478; W-646; W-610; W-618; W-53; W-487; W-624; W-626; W-627; W-471; W-622; W-549; W-227; W-616; W-516; W-609; W-576; W-416; W-698; W-550; W-537; W-632; F-268; W-656; W-426; W-422; W-95; FW-7; W-40; W-693; W-30; W-556; W-668; W-657; W-651; FW-5; W-466; W-477; W-440; W-438; W-423; W-31; W-602; W-604; W-229; W-106; W-464; W-539; W-551; W-645; W-688; L-17 W-563; W-116; W-230; W-405

Response: n. An explanation of the changes in the Forest Service Wilderness Study Area and Further Planning Area (RARE II) recommendations are contained in Changes Between the Draft and Final EIS, Chapter I of the FEIS as well as in the study reports (Appendix C, FEIS).

Comment: W-39 W-107 o. Lands containing resources of natural history values should be classified and protected under FSM 2362 namely WSA's.

Response: o. Various classifications of lands or sites for natural history resource values are possible under several authorities such as National Natural Landmarks, Wild and Scenic Rivers, or Research Natural Areas for example. Thorough studies are made on case-by-case basis of areas which appear to qualify. The Wilderness Act of 1964 provided that a wilderness may contain ecological geological, or other features of scientific, educational,

scenic, or historical values. However, wilderness designation is not used to accomplish those specific objectives of recognizing or protecting natural history area resource values.

Comment: W-49 W-642

p. Designating wilderness areas to deny access to mineral resources, without permitting an initial assessment of their potential is dangerous and foolish.

Response:

p. Access to valid mineral rights within wilderness is not denied for those rights and claims that were valid prior to midnight, December 31, 1983. The 1964 Wilderness Act withdrew wilderness from mineral access, exploration and development, except for valid claims existing prior to the December 31, 1983 date.

A mineral resource potential evaluation of the WSA's was completed by the U.S. Geological Survey and Bureau of Mines, Department of Interior. These reports are considered to be the best available information on the mineral resources of the Wilderness Study Areas. This information has been incorporated in the WSA and FPA reports, Appendix C, this document. This information is also displayed in Appendices H and I, Forest Plan.

Comment: W-455

q. Majority of WSA's have a high to moderate potential for discovery of locatable minerals and was not given adequate weight in performing the economic efficiency analysis for WSA's.

Response:

q. The economic efficiency analysis is only an indication for comparative purposes. It is not possible to speculate on values of minerals yet undiscovered.

Comment: W-654; F-315 F-146; W-642 F-251; F-66 W-50; F-65

r. Wilderness management is inconsistent with sound mutiple use principles and we oppose further expansion of wilderness areas.

Response:

r. All potential uses and benefits have been considered within the framework of the Forest Plans to best meet National, Regional, and local needs and assigned targets.

Comment: F-68; W-642 FW-4; F-86 F-79; F-120 F-74; W-634 F-146

s. Four-wheelers feel there is enough wilderness for wilderness lovers and some areas should be left open for their interest.

Response:

s. The Wilderness Study Areas are, for the most part, physically inaccessible to 4-wheel drive uses now. Designation of additional wilderness would not, therefore, significantly change the relative amount of lands open to 4-wheel drive vehicles.

Comment: W-28

t. There are errors in the economic efficiency analysis in all Wilderness Study Area Reports. There is a lack of emphasis given to economic efficiency analysis in making WSA recommendations.

Response:

t. Economic efficiency analysis for all alternatives including those in the Wilderness Study Area reports, the Further Planning Area report, and the FEIS alternatives was reanalyzed. This analysis was a significant consideration in the WSA recommendations.

21. EXISTING WILDERNESS

Comment: F-120 F-74 W-634 F-146

a. Opposed to wilderness because roads will be closed to off-road vehicles. Demand for ORV use will increase pressure for more roads and trails.

Response:

a. See response 20 s above. This applies to off-road vehicles as well.

Comment: W-106 W-107 W-208 W-532

b. Wilderness recreation demands are increasing as Front Range populations increase. This may require permit systems for areas of high use.

Response:

b. Permit systems may be required, however, indirect means to control use and impacts will be exhausted first.

Comment: F-301

c. Disagree with applying a permit system to an entire wilderness without the need being substantiated by a study.

Response:

c. A permit system will not be implemented in whole or in part without being substantiated by a study.

Comment: F-301

d. Disagree with allowing 25 people and 35 head of stock per party in wilderness. The fragile ecosystem cannot withstand such assaults. Limit should be 15 people and 8 head of stock.

Response:

d. Party size limits are based on studies by the Forest Service. Management direction has been changed to show a maximum party size of 25 people and/or recreation stock, where biological and physical resource capability can support that level of use

Comment: W-228 F-301

e. Prescriptions 8B, 8C, 8D, should not allow road building. Only existing roads should be allowed in wilderness.

Response.

e. Access is authorized only for mining and (valid rights prior to December 31, 1983) to valid inholdings within the 1964 Wilderness Act.

Comment: W-677 W-480 F-261 W-107

f. Wilderness should be managed as primitive rather than semiprimitive with no transition zones because they reduce the quality of wilderness. Existing wilderness should be completely protected from all forms of development. Agree with percentage of proposed wilderness designation.

Response:

f The Forest Service does not manage wilderness with transition zones. The primitive, semi-primitive distinction are not in conflict with Wilderness Act. They are aimed at providing differences in wilderness experience levels. The patterns in Pike and San Isabel wilderness of considerable semi-primitive is in recognition : of:

- demand
- relatively easy access
- close proximity to population centers

Comment: W-107

g. Public meetings or informal hearings should be held on each further planning area.

Response:

g. Opportunities for public input were available through the open houses and hearings. See the section, Consultatiom with Others Between the Draft and Final Environmental Impact Statements, this chapter.

Comment: W-107

h. Assessments of "need" for wilderness are biased against wilderness by disqualifying areas because other wilderness areas are near it.

Response:

h. No area was disqualified solely on the basis of

proximity to existing wilderness. This factor is weighed in considerations of amount of total wilderness as well as areas remaining for other resource management emphasis.

Comment: W-532 W-527 W-528

i. There should be no oil and gas leasing and timbering in wilderness and Wilderness Study Areas.

Response:

i. "Timbering" is effectively prohibited by law in wilderness and Wilderness Study Areas.

Designated wildernesses were withdrawn from mineral leasing on midnight, December 31, 1983. It is assumed that a designation of wilderness will withdraw the study area from all forms of mineral activity subject to valid existing rights. National Forest System lands not classified as wilderness will be managed as all other multiple use, non-classified lands. Until a decision or designation has been made by Congress, the Wilderness Study Area will be managed to protect the wilderness character.

Comment: W-207 W-473 W-228

j. Remaining wilderness areas should not be ruined by short term economic gains by oil and gas development. Oil and gas exploitation is marginal economically and therefore it is wiser to recycle, conserve, and use alternative energy sources.

Response:

j. Since January 1, 1984 designated wildernesses were withdrawn from all forms of mineral activity subject to valid existing rights.

Comment: W-4; W-207 W-6; W-16 W-691; W-107 W-211; W-532 F-9; F-28 W-473

k. Strongly oppose oil and gas leasing in both existing wilderness and Wilderness Study Areas because there will be irreversible consequences detrimental to wilderness. Use up oil and gas reserves outside wilderness before leasing in wilderness.

Response:

k. Since January , 1984 designated wildernesses were withdrawn from all forms of mineral activity subject to valid existing rights. Wilderness Study Area lands not designated wilderness will be managed as other nonclassified lands. Also, see response i of this section.

22. SOILS

Comment:

a. How were the potential and acceptable erosion

F-126
F-303
F-307
F-338

figures on page 195 of the DEIS, and the allowable sediment yield on page 187 of the DEIS calculated? Increased sedimentation and erosion do not appear justified. What is the relation between sediment yield of 74.1 thousand tons per year and 2 tons per acre per year of soil erosion which is termed "acceptable"?

a. The potential erosion figures were calculated using a soil erodibility hazard rating and on-site erosion calculation worksheet. Because of the generality in which data was gathered, professional judgment was used for "Total Ground Cover, Good Ground Cover and the Cover Coefficient" used to arrive at 3.1 tons/ac/yr. The Forest is approximately 25 percent complete with an order 3 Soils Inventory. Upon completion of the Forest-wide inventory, better information will be available. The following is the guide used in arriving at the 2 tons/ac/yr which is termed acceptable.

GUIDE FOR ASSIGNING SOIL LOSS TOLERANCE VALUES (T)
TO SOILS HAVING DIFFERENT ROOTING DEPTHS

Rooting Depth	Soil Loss Tolerance Values (Annual Soil Loss--Tons/Acres)	
(Inches)	Renewable Soil 1/	Non-Renewable Soil 2/
0-10	1	1
10-20	2	1
20-40	3	2
40-60	4	3
60+	5	5

1/ Soils with favorable substrata that can be renewed by tillage, fertilizer, organic matter, and other management practices.

2/ Soils with unfavorable substrata such as hard rock or weathered soft rock that cannot be economically renewed by any available method.

The allowable sediment yield is altogether different from the potential and acceptable erosion figures. The allowable sediment yield is the amount of sediment a stream can carry before reaching the threshold limit. The 74.1 tons was arrived at using a water and sediment yield model (HYSED). This model calculated the sediment a stream can carry without causing erosion to the channel. This amount of sediment is called the threshold level. Threshold sediment

levels need to be and will be developed for individual streams with a project by project analysis. This level of detail was not possible at the Forest planning level. It is our intention to maintain channels in good condition and not to allow degradation of streams.

Comment: F-259 F-311 F-343 F-307

b. The impacts of high erosion and sediment levels in streams on salinity, fish habitat, streambanks, and stream channels have not been delineated, and erosion control will be very expensive.

Response:

b. We agree, erosion is expensive. The Forest Service through planned mitigation measures limits or prevents entirely accelerated erosion. Management requirements in Forest Direction and Management Area Prescriptions, Chapter III, Forest Plan, insure that planned activities, as they are implemented, do not cause unacceptable increases in soil erosion and sedimentation to lakes and streams. In addition to the requirements displayed in the Forest Plan, project analysis for all projects proposed on National Forest System lands includes studies for potential increases in erosion and sedimentation. These analyses are documented in either Environmental Assessments or Environmental Impact Statements. Mitigation measures and project requirements as a result of this environmental analysis is in addition to that contained in the Forest Plan.

Comment: F-112 F-266 W-428

c. Motorcycle use on trails causes erosion and creates lasting scars on the land, which is not good management.

Response:

c. Motorized use of trails will be managed according to Soils Resource Management and Dispersed Recreation Management (General Direction statements 0608P1 and 0154 respectively) given in Forest Direction, Chapter III, Forest Plan.

23. QUAIL MOUNTAIN

Comment: F-270; F-61 F-312; F-57 F-300; F-258 F-169; F-202 F-323; F-103

a. Quail Mountain should be developed because it will:

-Provide year around recreation opportunities;
-Diversify and broaden economic base in area;
-Provide employment in area;
-Compliment Ski Cooper, and

F-293; F-147 -Provide educational opportunities with Colorado
F-294; F-141 Mountain College; and
F-184; F-208 -Utilize rather than consume resources.
F-28; F-206
F-115; F-161 Opposed to Quail Mountain because:
F-100, F-93
F-109; F-240 -Negative impacts on scenic beauty, cultural
F-195; F-334 resources, water quality, big game herd
F-157; F-162 dynamics, and current life style of area;
F-212; F-122 -Area lacks adequate and dependable snow fall.
F-236; F-23
F-145; F-194; FW-4, F-253; F-234; F-239; F-173; F-51; F-50; F-54; F-47; F-279; F-275; F-242; F-341; F-271; F-276; F-189; F-328; F-182; F-330; F-174; F-289; F-164, F-165; F-166; F-297; F-248; F-69, F-295; F-284; F-176, F-200; F-139; F-188; F-180; F-187; F-148; F-106; F-110; F-98; F-97; F-108; W-107; F-158; F-48; F-318; F-229; F-24; F-125; F-138; F-230; F-228; F-227, F-316; F-267; F-299, F-298; F-314; F-265; F-209; F-207; F-191; F-220; F-219; F-149; F-152; F-151; F-317; F-320; F-196; F-198; F-199; F-181; F-177; F-153; F-168; F-143; F-185; F-186; F-134; F-135; F-137; F-116; F-117; F-118; F-128; F-171; F-172; F-129; F-210; F-244; F-245; F-246; F-247; F-96; F-92; F-43; F-53; F-42; F-45; F-49; F-56; F-52; F-39; F-46; F-38; F-40; F-41; F-179; F-337; F-159; F-127; F-20; F-36; F-19; F-1; F-13; F-203; FW-3; F-136; F-132; F-170; F-311; F-313; L-14; L-10; F-44, F-101; F-105, F-111; F-114; F-121; F-130; F-144; F-156; F-167; F-218; F-233; F-287; F-296; F-131, F-288; F-238

Response: a. The Rocky Mountain Regional Guide in its role to provide direction to the Region's National Forests to facilitate land-use allocation decisions and to guide scheduling of subsequent development of potential winter sports sites has designated Quail Mountain as Priority 2. A Priority 2 designation indicates the site has been rated good with an adequate road system and with either adequate air or rail service to accommodate expected use.

The allocation of Quail Mountain to a 1B-2 Management Area Prescription in the Forest Plan (see Forest Plan Map) does not mean that a special use permit for a ski area will automatically be issued. What it does mean is that the area may have potential as a downhill ski area. Also, there is proponent interest in developing a ski area at Quail Mountain.

Entering into the Joint Review Process (JRP) to analyze Quail Mountain as a potential winter sports site also does not mean a permit will be automatically issued by the Forest Service.

The purpose of the JRP is to make sure that all permitting and affected entities are involved and that their concerns are addressed. Ideally

the JRP and resulting environmental documents will address the impacts of the proposed project in total (on and off-site impacts).

The 1B-2 allocation and the JRP allow for analysis of the mountain and the area for possible ski area development. The expected impacts on wildlife, cultural resources, water, recreation, grazing, and scenic quality will be analyzed with public input. In addition, off-site impacts will be reviewed and analyzed. This includes economics, quality of life, air and water quality, and available housing, in addition to the resources mentioned above.

The JRP is an open forum. Concerned citizens are encouraged to participate during the entire process. If the Environmental Impact Statement is funded and prepared by a third party, the procedures and analyses will have to meet Forest Service standards for disclosure of information under the National Environmental Policy Act requirements. The social, physical, economic and biological impacts will be analyzed in depth and displayed in a draft environmental impact statement which will be distributed for public review and comment. Comments on the draft EIS will be considered and acted upon prior to preparing a final environmental impact statement. The responsible official will carefully review the final EIS, which will contain the public comment along with the Forest Service action and response, prior to making a decision on whether or not to issue a special use permit for use of National Forest System land.

24. VISUALS

Comment: F-321; F-278 F-281; F-242 F-279; F-232 F-234; W-438

a. The increased timber cutting in Lake County will unacceptably affect scenic beauty. Clearcutting will be detrimental to dispersed recreation and visual resources.

Response:

a. The average annual timber harvest level proposed for Lake County has been reduced. Management areas emphasizing dispersed recreation have been added throughout this area. Vegetation management activities in these areas will be designed in such a way as to appear as natural patterns. Please refer to the Standards and Guidelines in the Forest Direction and Management

Area Direction sections, Chapter III of the Forest Plan for details on visual resource protection.

25. CULTURAL RESOURCES

Comment: F-91 F-57

a. Cultural resources, both historical and archeological, of the National Forests need to be located, evaluated and protected. Those sites potentially eligible for the National Register of Historic Places need to be evaluated and protected.

Response:

a. The Forest Plan gives very specific direction on the management of cultural resources on National Forest System lands. The National Historic Preservation Act requires that eligible properties be nominiated to the National Register of Historic Places. In order to accomplish this, all cultural resources must first be inventoried and evaluated. Other appropriate measures may be avoidance, collection, interpretation, protection, recording or allowing qualifying institutions or organizations to study and research these resources.

COMMENTS FROM FEDERAL, STATE, AND LOCAL AGENCIES AND ELECTED OFFICIALS

Thirty-two letters were received from Federal, State and local agencies and elected officials on the Draft EIS and Proposed Forest Plan. These letters are reproduced in their entirety on the following pages. The concerns in the letters are bracketed and numbered and the responses are correspondingly numbered. An alphabetical listing of government letters is shown in Table VI-4, page VI-17.

LETTER L-1

STATE OF COLORADO

COLORADO NATURAL AREAS PROGRAM
Department of Natural Resources
1313 Sherman Street, Room 718
Denver, Colorado 80203

Phone (303) 839-3311

December 21, 1982

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

Dear Mr. Morgan:

We request your consideration of the following comments on the "Pike-San Isabel National Forests Land and Resource Management Plan and Draft Environmental Impact Statement" submitted by the Colorado Natural Areas Program (CNAP), Colorado Department of Natural Resources.

VI-179

The Colorado Department of Natural Resources and the United States Forest Service have a Memorandum of Understanding (MOU) which describes a process for the identification and protection of those areas on Forest System Lands in Colorado which qualify as state natural areas (e.g., possess natural characteristics of statewide or national significance).

I recommend that the information contained on pages 110 and 111 of the DEIS be revised and expanded to accurately reflect the role of CNAP and the cooperative relationship between CNAP and USFS in identifying and protecting potential natural areas in Colorado. It would be particularly helpful to specify and describe the "special areas" (including natural areas) within the 340,000 acres of Pike and San Isabel National Forests (p. 17). 1 2

Enclosed for your information is information on the Colorado Natural Areas Program as well as information on registered and designated natural areas in the Pike and San Isabel National Forests. Natural areas in Colorado are areas which typify native vegetation and aquatic ecosystems and their associated biologic and geologic features; provide habitat for rare or endangered animal or plant species; or include geologic or other natural features of scientific or educational value. The Program is authorized to: 1) establish a statewide registry of qualified natural areas, involving no written agreement or obligation on the part of any party; 2) designate areas on the Registry by means of voluntary agreements with public or private landowners; and 3) monitor the landowner's management and protection of designated sites. 3

FOREST SERVICE RESPONSE

1. The discussions of potential Research Natural Areas in the Final Environmental Impact Statement have been expanded to include the role of the Colorado Natural Areas Program (CNAP) and the cooperative relationship between the CNAP and the Forest Service in identifying and protecting potential Research Natural Areas. Additionally, other potential Research Natural Area sites have been identified. See the section, THE NEED TO ESTABLISH OR CHANGE MANAGEMENT DIRECTION, Chapter II, Forest Plan.

2. Descriptions of all "special areas" are contained in the planning record. These are lengthy descriptions which may be reviewed at the Forest Supervisor's Office, Pueblo.

3. We appreciate your contribution of information on the Colorado Natural Areas Program and on registered and designated natural areas in the Pike and San Isabel National Forests. This information is included here and has also been made a part of the planning record.

The Program's Natural Heritage Inventory provides necessary data to identify and evaluate the most outstanding examples of Colorado's natural heritage. Highest priority sites are considered for the Registry by the Colorado Natural Areas Council, an advisory council appointed by the Governor. Registering a site means that the site meets the Program's scientific criteria for a natural area. Comments from the Inventory are enclosed for your information and consideration.

Colorado Natural Areas

Two areas in the Pike-San Isabel National Forests have been designated by the Colorado Department of Natural Resources and the USFS as research natural areas: Hurricane Canyon Research Natural Area and Saddle Mountain Research Natural Area (see enclosures). Two areas in the Pike-San Isabel National Forests have been registered by the Colorado Natural Areas Program:

Braya Humilis Natural Area. This site is one of three known occurrences of the Category I plant species, Braya humilis ssp. ventosa. This site was placed on the Natural Areas Registry on April 8, 1982. Further study and assessment is required prior to a recommendation for designation under the Colorado Natural Areas Program. 4

East Hoosier Ridge Natural Area. This site contains special habitat for rare plant species Eutrema penlandii and Saussurea weberi. Both are currently being evaluated by the U. S. Fish and Wildlife Service for federal listing. This site was placed on the Natural Areas Registry on December 9, 1980. The Council supports designation of the East Hoosier Ridge Natural Area by the USFS as a special botanical interest area. 5

Buffalo Peaks Wilderness Study Area

The attached comments from the Colorado Natural Heritage Inventory, indicate that twenty-two plant communities of national concern have been identified in Colorado. Three of these ecosystems occur within the Buffalo Peaks Wilderness Study Area:

1) Muhlenbergia filiculmis montane grassland:

2) Festuca arizonica - Muhlenbergia filiculmis montane grassland

3) Pinus aristata/Festuca arizonica - Muhlenbergia montana. 6

The Buffalo Peaks Wilderness Study Area would enhance the representation of land forms and ecosystems in the National Wilderness Preservation System because of the existence of these unique ecosystems within the Wilderness Study Area. CNAP encourages USFS to reconsider its recommendation of the Buffalo Peaks Wilderness Study Area as non-wilderness and to include a

FOREST SERVICE RESPONSE

4. Chapter III of the Environmental Impact Statement has been expanded. The registered Braya humilis site on West Hoosier ridge is partially on private and partially on National Forest System lands of the Pike National Forest and the White River National Forest. The Nature Conservancy has purchased approximately four acres of the private land portion of the site to provide better protection for the entire site. Additional sites where this species occurs have been found. Discussions have been added to the Plan to reflect the process for timely studies of the current sites and others identified in the future to determine the need for special designation. Seven additional locations with populations of Braya humilis have been identified in Gunnison, Park and Lake Counties, Colorado. Specific data of these sites is contained in the planning record in the Supervisor's Office, Pueblo, and is available for review.

5. This site is registered and protected. The Forest Service will study this site in the near future for classification as a Botanical Special Interest Area.

6. That portion of the Buffalo Peaks Wilderness Study Area (36,060 acres) is being recommended for addition to the National Wilderness Preservation System.

biologic evaluation of this area's wilderness potential in their final analysis

6

If the USFS continues to recommend against wilderness for the Buffalo Peaks Wilderness Study Area, CNAP encourages the USFS to consider specific sites within the WSA as potential Research Natural Areas or as Special Botanical Interest Areas. In accordance with the existing MOU, CNAP will work closely with the USFS on identifying potential areas containing exemplary ecosystems within the WSA.

7

Thank you for your consideration of these comments If you have any questions, please contact me.

Sincerely,

Carse Pustmueller

Carse Pustmueller, Ph D
Director
Colorado Natural Areas Program

Attachment

CP/ljc

P S.

I would like to call your attention to the description of the lesser prairie chicken (Tympanuchus pallidictinctus) "site" on the Comanche National Grassland (DEIS, p. 110) The Colorado Natural Areas Program is aware of the lesser prairie chicken sites, but is not prepared to register these sites as a state natural area at this time. However, I am interested in working with you on these sites to determine their importance and to evaluate their potential as a state natural area

8

FOREST SERVICE RESPONSE

7 See response to number 6 above

8 This site has been allocated to Management Area 10C, Special Interest Area Lesser prairie chicken habitat will receive primary management emphasis Standards and guidelines have been developed that are specific to the protection of the lesser prairie chicken habitat See Management Area Prescription 10C, Chapter III, Forest Plan

IR# 157

Enclosure to Letter L-1

COLORADO NATURAL HERITAGE INVENTORY
1550 Lincoln Street, Room 110 Denver Colorado 80203 (303) 866-5887

TO: Stephen O. Ellis

DATE 19 November 1982

FROM: Colorado Natural Heritage Inventory

CC: C. Pustmueller
S. Bissell

DATA PERTAINING TO. Pike and San Isabel National Forests; Comanche and Cimarron National Grasslands Forest Plan and Draft EIS

The following species should be considered for inclusion in Table III-21, Management Indicator Species, p. 122.

COMANCHE NATIONAL GRASSLANDS

Amphibians

Couch's spadefoot (Scaphiopus couchi) - Special Concern Species: known from only six narrowly separated localities in Colorado, although widely distributed throughout the rest of its range. Two of the Colorado sites are on the Grasslands and two are on inholdings within the Grasslands. This species is restricted to seasonal pools and ponds during breeding season

Green toad (Bufo debilis) - Special Concern Species. currently known from only five narrowly separated localities in Colorado, although widely distributed throughout the rest of its range. Two of the Colorado localities are within the Grasslands and the remainder are on inholdings within the Grasslands. 9

Reptiles

Yellow mud turtle (Kinosternon flavescens) - Special Concern Species. restricted to extreme eastern Colorado in about 10 localities in the Republican, Arkansas, and Cimarron drainages. This species occurs on both the Grasslands and on inholdings. Its habitat is restricted to areas of permanent and intermittent water.

Ground snake (Sonora semiannulata) - Special Concern Species: known from only 10 closely located sites in southeastern Colorado, although more widely distributed throughout the rest of its range Three of the Colorado sites are on inholdings and one within the Grasslands. The species occurs in a variety of grassland habitats, such as canyon bottoms, outcrops, and sand blows.

FOREST SERVICE RESPONSE

9 The Comanche Management Indicator Species additions include species that require riparian habitat The 9A Management Prescription Area (MA) has been added All the canyon lands are in 4B MA except what is in 9A We are aware of these species existence and are providing for their habitat needs

Enclosure to Letter L-1

PLANT COMMUNITIES

The Draft Environmental Impact Statement for the Pike and San Isabel National Forests and Comanche and Cimarron National Grasslands does not specify (p.17) which Natural Areas will be established, or are established to date. A list of these and other Special Areas would be beneficial. 10

While we recognize the Timpas Research Natural Area in the Comanche National Grassland has been the object of considerable study by the Forest Service Research Natural Area Committee, in reviewing the Establishment Report for the Timpas site, we feel there are a number of problems with using this site to represent Kuchlers K-65 (Grama-Buffalo Grass) type: (1) The site is only 40 acres in size. While this may be the largest available site suitable on the Comanche, 40 acres is insufficient to represent a type that may formerly have occupied several million acres. While 40 acres may be complementary to a larger natural area in another part of the Great Plains, it may be advisable to withhold establishment until a larger area is located, (2) The site has "been grazed heavily in the past" and "is in poor range condition." These statements in the Establisment Report suggest the site will not serve as a satisfactory baseline research area. In addition, the exotic weed, Salsola kali, is the dominant plant on the "Swale Site." (3) Absence of buffalo grass suggests the site may not be representative of the K-65 type. While these factors may lessen the desirability of the site as a potential Research Natural Area, the site may warrent continued protection as a research exclosure for use in management of the Comanche National Grassland. 11

The Buffalo Peaks Wilderness Study Area would significantly improve the representation of landforms and ecosystems in the National Wilderness Preservation System. The following ecosystems have been identified by the Colorado Natural Heritage Inventory as 3 of 22 ecosystems of National Concern in Colorado These ecosystems are unique to a small part of the State of Colorado, are declining under current management, and are not known to occur in adjoining, or nearby, established Wilderness Areas: 12

1. Muhlenbergia filiculmis montane grassland
2. Festuca arizonica - Muhlenbergia filiculmis montane grassland
3. Pinus aristata/Festuca arizonica - Muhlenbergia montana

Abstracts describing these ecosystems are enclosed for your information.

These ecosystems correspond to the following plant associations listed in "Plant Associations of Region Two." (U.S.D.A. Forest Service, Region 2, Range and Wildlife Management, Edition 2 - March 1982):

1. Muhlenbergia filiculmis/Artemisia frigida p.a. (p. 140).
2. No corresponding association in Region Two list.
3. Pinus aristata/Festuca arizonica p a. (p. 32).

FOREST SERVICE RESPONSE

10 The listing shown in the section, Considerations that Remained Constant in all Alternatives, Chapter II, of the Final EIS is of existing special areas Other proposed special interest areas planned for future study are discussed in the Forest Plan, Chapter II, the section, THE NEED TO ESTABLISH OR CHANGE MANAGEMENT DIRECTION

11 Forest Service studies are completed regarding the proposed Research Natural Area on the Timpas Unit in the Comanche National Grassland The area does not qualify for Research Natural Area classification for the reasons you have stated

12 Thank you for this information It has been made a part of the planning record

The Spanish Peaks Wilderness Study Area, contains no known ecosystems of State or National Concern identified by the Colorado Natural Heritage Inventory.

The Greenhorn Mountain Wilderness Study Area contains no known ecosystems of State or National Concern identified by the Colorado Natural Heritage Inventory.

The Sangre de Cristo Wilderness Study Area contains no known ecosystems of State or National Concern identified by the Colorado Natural Heritage Inventory. This area is, however, poorly known vegetationally. Accurate assessment of vegetation importance cannot occur until Forest Service lands are inventoried for plant associations.

SPECIAL PLANTS

There is no section in the Land and Resource Management Plan or the Draft EIS that addresses U.S.F.W.S. Notice of Review Category 1 and 2 plant species, or Colorado Plant Species of Special Concern. Of particular concern is the lack of data addressing Frasera coloradensis in the Comanche National Grassland and the new data regarding Braya humilis ssp. ventosa and Ptilagrostis porteri in the Pike National Forest. 13

FOREST SERVICE RESPONSE

13 This information has been added in the Plan All three species have been included

Pinus aristata/Festuca arizonica - Muhlenbergia montana

Bristlecone pine/Arizona fescue - mountain muhly

DESCRIPTION: Pinus aristata is the only tree present in this association. It apparently is very scattered at low density, about 155 trees/acre (Stewart 1940).

The shrub layer is poorly developed, with Ribes cereum (wax currant) with less than 5% cover, Artemisia frigida (fringed sagebrush) with about 2% cover, and Holodiscus dumosus (bush rockspirea) generally present.

Festuca arizonica and Muhlenbergia montana codominate the herb layer, with 10 - 20% cover. Other grasses that may occur include Muhlenbergia filiculmis (slimstem muhly) and Sitanion hystrix (bottlebrush squirreltail).

Commonly associated forbs include Geranium caespitosum (purple geranium), Erigeron nanus (no common name), Pseudocymopterus montanus (pseudocymopterus), Artemisia dracunculus (false tarragon), and Potentilla hippiana (horse cinquefoil).

EXAMPLE STANDS:

Species	Shepherd (1975) Habitat Type 22, p. 32
Ribes Cereum	4
Artemisia frigida	2
Festuca arizonica	7
Muhlenbergia montana	6
Muhlenbergia filiculmis	1
Sitanion hystrix	1

RESPONSE TO DISTURBANCE: No published information available. It is likely that domestic grazing results in decreases in Festuca and Muhlenbergia and increases in Artemisia frigida and Sitanion.

ENVIRONMENTAL LOCATION: Occurs from 9,500 - 11,000 feet (2900 - 3350 m) in elevation, on generally south to west-facing, steep (20 - 30 degrees) slopes.

These sites may have 67% cover of bare exposed rock. Soils and parent material information are not available.

DISTINGUISHING FEATURES: No other Pinus aristata association has Festuca and Muhlenbergia as major associates. This is the lowest elevation P. aristata association in Colorado.

Known only from the northeastern San Juan Mountains in Saguache and Mineral counties, Colorado

SYNONYMY: Bristle-cone Pine Forests Stewart (1940)

FIELD INVENTORY INFORMATION: None

PHOTOGRAPHS. Shepherd (1975) p. 32.

REFERENCES: Shepherd (1975) has the only quantitative data. Stewart (1940) describes similar vegetation, though Muhlenbergia is not cited as being present.

Shepherd, H.R. 1975. Vegetation of two dissimilar Bighorn Sheep Ranges in Colorado. Colo. Div. Wildlife Div. Rep. No. 4 p. 32.

Stewart, B.K. 1940. *Plant Ecology and Paleo-Ecology of the Creede Valley, Colorado.* Phd Diss., Univ. of Colo., Boulder. p. 80.

FURTHER INFORMATION NEEDED: (1) More complete quantitative data, (2) Information on Response to Disturbance.

LY.FØM
MUFI1 MONTANE GRASSLAND

Muhlenbergia filiculmis Montane grassland

Slimstem Muhly montane grassland

DESCRIPTION: Artemisia frigida (fringed sagebrush) and Chrysothamnus nauseosus (rubber rabbitbrush) may occur in this association, with 1 - 5% cover.
Muhlenbergia filiculmis dominates the association where it is in good condition, probably with 10% or more cover. Quantitative data are not available for semipristine stands. Commonly present, with 1 - 5% cover, are Bouteloua gracilis (blue grama) and Carex obtusata (no common name).
Commonly associated forbs include Hymenoxys richardsonii (pingue) and Arenaria fendleri (fendler sandwort).

EXAMPLE STANDS:

Species	Shepherd (1975) Site 11 p. 157	Site 12 p. 163
Artemisia frigida	3	7
Chrysothamnus nauseosus	1	-
Muhlenbergia filiculmis	3	7
Bouteloua gracilis	18	13
Carex obtusata	2	3
Hymenoxys richardsonii	3	2
Arenaria fendleri	-	1

RESPONSE TO DISTURBANCE Published information is not available, but it is likely that Muhlenbergia filiculmis decreases with domestic grazing, while Artemisia frigida, Chrysothamnus nauseosus, Gutierrezia sarothrae (broom snakeweed), Bouteloua gracilis, and Hymenoxys richardsonii all increase. Stands such as 11 and 12 above represent a somewhat degraded condition.

ENVIRONMENTAL LOCATION: The association occurs from 8400 - 9600 feet (2560 - 2925 m) in elevation on relatively flat to gently rolling (2 - 12 degrees) mostly southerly-facing slopes. Ramaley (1942) says the association occurs on north-facing slopes and moist level ground in the upper stream valleys.
Soils information is not available, but the sites appear to be very rocky, with 50% or more of the ground surface exposed soil and rock.

DISTINGUISHING FRATURES The Festuca arizonica - Muhlenbergia filiculmis association occurs in the same area in moderately steep to steep south-facing slopes.

RANGE: The association is known only from the northeastern slopes of the San Juan Mountains and the margins of the San Luis Valley, in Mineral and Saguache counties, Colorado.

SYNONYMY:

Muhlenbergia - Bouteloua association	Ramaley (1942)
Muhlenbergia filiculmis/Artemisia frigida p.a.	U.S D A. For. Serv 1981
Muhlenbergia - Bouteloua grasslands	Stewart (1940)
Habitat Type 11 p. 22, Habitat Type 12 p. 38	Shepherd (1975)

FIELD INVENTORY INFORMATION. Muhlenbergia filiculmis and Muhlenbergia montana are difficult to distinguish when immature. For this reason, field inventories are best conducted after late June

PHOTOGRAPHS· Shepherd (1975) p. 22, 38, Stewart (1940) p. 48,49.

REFERENCES: The best quantitative data are in Shepherd (1975). Ramaley (1942) merely mentions the existence of such an association. Stewart (1940) discusses the association, lists associated species, frequency data, and phenological aspects. U.S D A. For. Serv. (1981) summarizes dominant species, based on Shepherd (1975).

Ramaley, F. 1942. Vegetation of the San Luis Valley in southern Colorado. Univ. Colo. Stud. D, I:231 - 277. (p. 269 Muhlenbergia - Bouteloua Association.)

Shepherd, H.R. 1975. Vegetation of Two Dissimilar Bighorn Sheep Range in Colorado. Colo. Div. Wildlife Div. Rep. No 4. 223p. (p. 22 & 157, 38 & 163).

Stewart, B.K 1940. Plant Ecology & Paleo-Ecology of the Creede Valley, Colorado. Phd Diss., Univ. of Colo, Boulder. 154p (p. 43 Muhlenbergia - Bouteloua grasslands).

U.S.D.A. For. Serv. 1981. Plant associations of Region Two Range and Wildlife, U.S.F.S. Regional office, Denver, Colorado (p. 90 Muhlenbergia/Artemisia frigida p.a.).

LR.MØM 11-7-82
FEARI-MUFI1 MONTANE GRASSLAND

Festuca arizonica - Muhlenbergia filiculmis montane grassland

Arizona fescue - Slimstem muhly montane grassland

DESCRIPTION: The only shrub species present in this association is Artemisia frigida (fringed sagebrush), which may have up to 5% cover.
Festuca arizonica and Muhlenbergia filiculmis codominate the association with 15% or more cover. Commonly associated graminoids include Bouteloua gracilis (blue grama), Koeleria cristata (prairie junegrass), and Carex obtusata (no common name).
Commonly associated forbes include Hymenoxys richardsonii (pinque) and Eriogonum umbellatum (sulfur buckwheat).

EXAMPLE STANDS:

	Shepherd (1975)		
Species	p. 163 plot 11	p. 157 plot 13	p. 168 plot 37
Artemisia frigida	4	4	3
Festuca arizonica	4	5	2
Muhlenbergia filiculmis	7	7	10
Bouteloua gracilis	10	6	4
Carex obtusata	2	1	-
Koeleria cristata	2	2	2
Hymenoxys richardsonii	3	2	4

RESPONSE TO DISTURBANCE: The example stands cited above are probably degraded from domestic grazing. It is likely that Bouteloua gracilis and Hymenoxys richardsonii increase with grazing, while Festuca and Muhlenbergia decrease, though published information is not available.

ENVIRONMENTAL LOCATION: The association occurs from 8500 - 10,100 feet (2600 - 3075 m) in elevation on moderate to steep (5 - 31 degrees) mostly southerly-facing slopes, but also on north and west-facing slopes.
Soils information is not available, but surface exposure of rocks and bare soil is high, averaging 50% or more. Parent materials in one area are Tertiary andesites and tuffs, though it is not known if the association is restricted to these substrata.

DISTINGUSHING FRATURES: The Muhlenbergia filiculmis montane grassland occurs on flat to very gently slopes in the same area. The Festuca arizonica - Muhlenbergia montana montane grassland occurs in the same area, but it is not known what environmental factors distinguish the two grasslands.

RANGE: Currently known only from the lower slopes of the northeastern San Juan Mountains in Mineral and Saguache counties, Colorado.

SYNONYMY: None

FIELD INVENTORY INFORMATION: Muhlenbergia filiculmis and Muhlenbergia montana are difficult to distinguish when immature. For this reason, field inventories are best conducted after late June.

PHOTOGRAPHS: Shepherd (1975) p. 24, 37, 50.

REFERENCES: Most of the information in this summary is from Shepherd (1975). Stewart (1940) mentions this combination of dominant grasses, but it is difficult to discern the extent of the association in her study area.

Shepherd, H.R. 1975. Vegetation of Two Dissimilar Bighorn Sheep Ranges in Colorado. Colo. Div. of Wildlife Div. Rep. No. 4 p. 24 and 157, 37 and 163, and 50 and 168.

Stewart, B.K. 1940. Plant Ecology and Paleo-Ecology of the Creede Valley, Colorado. Phd Diss., Univ. of Colo., Boulder. p. 43.

FURTHER INFORMATION NEEDED. (1) Response to disturbance, (2) how separated environmentally from Festuca arizonica - Muhlenbergia montana montane grassland.

WHAT IS A NATURAL AREA?

A natural area, as defined in Colorado, is a physical and biologic area which either retains or has reestablished its natural character (although it need not be completely undisturbed) It is an area which typifies native vegetation and aquatic systems and their associated biologic and geologic features; provides habitat for rare or endangered animal or plant species, or includes geologic or other natural features of scientific or educational value.

A designated natural area is a registered site which has been formally recognized under the provisions of the Natural Areas Act. Designation is accomplished by a legal agreement (the Articles of Designation) made between the landowner and the State of Colorado, which describes the outstanding attributes of the property, the responsibilities of the landowner and the State, and makes provision for the management of the area.

A registered natural area has been evaluated by the Natural Areas Council and found to meet the Program's ecological and/or geological criteria. A vote to register an area is taken only with the landowner's permission, but it involves no legal responsibility on the part of the State or the landowner. It is usually a preliminary step toward designation.

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COLORADO NATURAL AREA

HURRICANE CANYON RESEARCH NATURAL AREA

Owner/Manager

U.S Forest Service
Rocky Mountain Region
11177 West 8th Avenue
Lakewood, CO 80225

Physical Descriptors

El Paso County, 6th P M., T 13S, R 68W, portions of Secs. 34, 35, 520 acres; 7,400' - 9,200', exemplary plant community.

Unique Features:

The area, dominated by virgin stands of Douglas Fir and Ponderosa Pine, is one of the few remaining examples of the original, eastern slope, lower montane forest (much of which has been logged, grazed or otherwise disturbed).

Area Description

Hurricane Canyon Research Natural Area is characterized by steep slopes and either boulder-filled canyons or narrow bottoms of colluvial soil. There are two primary canyons, cut by the North and South Forks of French Creek, and several secondary canyons The primary canyon walls are steep and rock outcrops of Pikes Peak granite are abundant on the ridges. The area is covered by a dense virgin forest of Douglas Fir and Ponderosa Pine Oak brush is present at lower elevations, and Engelmann and Blue Spruce are present in small acreages along stream bottoms at higher elevations of the natural area

Status

Registered September 26, 1978
Designated October 31, 1980 as a Scientific Natural Area

Condition:

Excellent.

Level of Visitation:

Low

Research or Educational Activities:

The USFS has conducted studies on the area in connection with its own process for the designation of research natural areas.

Enclosure to Letter L-1

COLORADO NATURAL AREA

SADDLE MOUNTAIN RESEARCH NATURAL AREA

Owner/Manager:

U.S. Forest Service
Rocky Mountain Region
11177 West 8th Avenue
Lakewood, CO 80225

Physical Descriptors:

Park County; 6th P.M., T. 14S, R. 72W, portions of Secs. 8, 17, 480 acres; 9,200' - 10,700'; exemplary plant communities.

Unique Feature:

An undisturbed parcel of land characteristic of the foothills around South Park, with a meadow containing a climax grassland, and very vigorous stands of Bristlecone Pine, Engelmann Spruce, Subalpine Fir and Aspen.

Area Description

Saddle Mountain is located on a northwest facing slope cut by a shallow canyon. The fertile soil, derived from basaltic rocks, supports a variety of plant communities. Wide meadows are covered by an unusual climax stand of oat-grass (Danthonia intermedia) A large stand of rather tall Bristlecone Pine covers portions of the property, these are not the classically gnarled Bristlecone Pine to be found on wind-swept areas like Mount Goliath, but, occurring in a more protected area, have grown to heights of 50 feet, with extensive regeneration. Dense stands of Engelmann Spruce and Subalpine Fir are also evident The aspen, which have regenerated in the canyon bottom, may be invading the meadows. The area provides some habitat for mule deer and elk, and other animals common to the Engelmann Spruce-Subalpine Fir ecosystem.

Status:

Registered on September 26, 1978.
Designated on October 31, 1980, as a Scientific Natural Area.

Condition:

A recent inspection tour indicated the area was in excellent condition, with no traces of the stock grazing which terminated over 30 years ago

Level of Visitation

Unknown, but thought to be low

Research or Educational Activities

None currently.

Enclosure to Letter L-1

COLORADO NATURAL AREA

WEST HOOSIER BRAYA SITE

Owner/Manager:

U. S. Forest Service
Pike and San Isabel National Forest
910 Highway 50 West
Pueblo, CO 81008

White River National Forest
Old Federal Building
P. O. Box 948
Glenwood Springs, CO 81601

Physical Descriptors.

Park County; T. 8S, R. 78W, portions of section 11; 40 acres; 12,000'; Special Plant.

Unique Features:

One of three known occurrences in the world of Braya humilis ssp. ventosa, a species of plant qualified for federal listing.

Area Description:

This site, just northwest of Hoosier Pass and above timberline, was the first population of this rare species of Braya discovered in Colorado. Only 500 individuals of this species occur in this population. The species occurs on a steep rocky slope in alpine tundra. The individual plants are frequently concealed by rocks and other plants. The Natural Areas Program has asked the U. S Forest Service to consider designation of this site as a Special Botanical Interest Area or as a Research Natural Area.

Status:

Registered April 8, 1982.

COLORADO NATURAL AREA

HOOSIER RIDGE

Owner/Manager.

U.S. Forest Service
Rocky Mountain Region
11177 West 8th Ave
Lakewood, CO 80225

Physical Descriptors:

Park/Summit counties; 6th P.M., T. 8S, R 77W, portions of Secs. 7, 8, 17, 18, and T. 8S, R 78W, portions of Secs. 12, 13; 920 acres. 12,500' - 12,814'; special plants, exemplary plant communities.

Unique Feature:

Important habitat for the rare plants, Eutrema penlandii and Saussurea weberi, both currently under investigation for federal listing by the U.S. Fish and Wildlife Service. Also provides habitat for Armeria maritima ssp. sibirica and Ipomopsis globularis, both rare species for Colorado.

Area Description:

On this alpine site, well above timberline, one finds a number of unusual occurrences of rare species of plants. Here, where the Continental Divide runs east and west, moist bogs with mossy ground cover provide the necessary habitat for Eutrema penlandii. Something of the nature of the area may be inferred from the fact that the genus, Saussurea, and the subspecies, A. maritima sibirica, are disjuncts from other arctic and high alpine areas; that is, they occur in the far north, and in a few sites in Colorado, but have been found nowhere between. For example, the nearest occurrence of A. maritima sibirica is found in Labrador, and the plant is characteristic of arctic seashores. One theory is that these plants are relict species of the Great Ice Age which covered much of North America.

Status:

Registered December 9, 1980.

Condition:

Excellent.

Research or Educational Activities:

Continuing cooperative research on Eutrema penlandii and Saussurea weberi is being conducted by the U.S. Forest Service, U S. Fish and Wildlife Service, the University of Colorado, and the Colorado Natural Areas Program.

STATE OF COLORADO
Richard D. Lamm, Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
Jack R Gneb Director
6060 Broadway
Denver Colorado 80216 (825-1192)

LETTER L-2

December 14, 1982

Mr. Stephen O. Ellis
State Clearinghouse
Centennial Building
1313 Sherman Street, Room 523
Denver, CO 80203

Dear Steve:

SUBJECT: Pike and San Isabel National Forest Management Plan and EIS

We have reviewed this rather impressive document in some detail. That is partially the reason why our response has been delayed However, we do have some comments to make at this time.

By in large, the plan is well prepared and addresses most issues of concern. We do not have any major specific problems but feel that overall emphasis on increased grazing, timber harvest, mineral development, and year-round recreation may be greater than necessary and may have serious impacts on wildlife. In particular, many of our field personnel expressed concern that the big game (deer and elk) plans fall short of what is necessary and that proposed increases are far too conservative. We are also concerned that increased 4x4 vehicle recreation use without associated increases in enforcement capabilities can only result in degradation of wildlife habitat. 1 2 3

VI-191

One of the main reasons we are concerned about overall emphasis is that loss of wildlife habitat on private lands surrounding the forest lands will undoubtedly continue. This will place greatly increased importance on the public lands for wildlife benefits. Thus, increased commercial use of forest lands may be a laudable short-term goal, but it may seriously impeed long-range options. 4

Throughout the document "increased habitat diversity" is mentioned This is not necessarily a proven benefit for some species; and in some circumstances, creation of a highly heterogeneous situation may be much less desirable. 5

We received numerous comments from our field personnel which we feel are pertinent to the overall document and especially to specific points. I will mention these more or less in the order received and include references to pages as necessary

FOREST SERVICE RESPONSE

1 The Forest Plan provides a balance of multiple resource uses on National Forest System lands The Forest will continue to cooperate with the Division of Wildlife to reach a resolution where wildlife conflicts occur, associated with grazing, timber harvest, mineral development and year-round recreation Environmental analysis will still occur on a project-by-project basis Cooperation between agencies insures Division of Wildlife concerns are addressed in these environmental analyses

2 Proposed activities to increase deer and elk winter range carrying capacity are identified jointly by Division of Wildlife and Forest Service personnel in areas where winter range has been determined as limiting population numbers Proposed increases in carrying capacity are very significant, given natural plant succession toward conditions less desirable for deer and elk, habitat potential for treatment, and lack of knowledge in some cases of what habitat factor(s) is in fact limiting deer and elk population numbers

3 The Forest Plan, Chapter III, Management Direction (Forest Direction and Management Area Prescriptions) has been revised to provide management requirements for travel management The Forest Plan and FEIS now contain additional discussions of travel management and its relationship to other resource values on the Forest.

4 Wildlife habitat management to meet both short-term and long-term habitat goals set jointly by the Division of Wildlife and the Forest Service is a major emphasis of the Forest Plan

5 Your point is well taken and has been considered in the development of the Final Forest Plan

LETTER L-2 continued

Stephen O. Ellis
Page 2
December 14, 1982

Page 29 (RMP) shows greatly increasing demands on deer and elk but only a 1,000 animal increase by the year 2000. When compared with the demands and objectives for other categories, we feel this does not seem equitable, nor does it reflect the increased responsibility of the Forest Service as wildlife habitat disappears on private lands. 6

Page 22 (EIS) seems to place hunting and fishing benefits in the $3/day dispersed recreation category. This seems to be an extremely low figure to us. Certainly the figure should be higher, in fact hunting and fishing probably deserve separate analysis. 7

From the standpoint of wildlife values, the designation of Quail Mountain as 1-B is inappropriate. This designation will make other units in the area difficult to manage as big game winter range and will probably accelerate development of private holdings. Wildlife benefits will be better maintained with a 5-B designation. 8

Although some sites around Twin Lakes may not be prime winter range, we wish to maintain everything as 5-B In fact, this designation should be extended south to the shoreline and west to the town of Twin Lakes. In light of current and future impacts, we feel this designation is a matter of priority. 9

The southern portion of Mount Zion (No Name Gulch south) should be designated as 5-B. This area supports a small but viable elk herd 10

The area north and south from Big Union to Sawmill Gulch should be included in the 5-B designation to the west. This area is and will become very important to wintering big game Additionally, the southern portion of the 2-B unit to the north, which includes Dry Union and Empire Gulch, is extremely important and should be 5-B as well 11

The unit south of Mount Elbert summit near Monitor Rock should not be designated 5-B. This area has no potential as winter range. A 4-B designation would be adequate 12

We are concerned that there is no 5-B designation between Fairplay and Como. This area currently winters approximately 300 head of elk. 13

Long Park and Red Ridge in Pony Park should also be 5-B This would be more consistent with past management practices of the Forest Service and the Division of Wildlife This also applies to Mud Hill, Rock Springs, and Eagle Rock. This area currently winters 200 to 300 elk. 14

The 5-B designation on Black Mountain should be extended and 39 Mile Mountain deserves the same status 15

FOREST SERVICE RESPONSE

6 After reanalysis, deer and elk winter range habitat capability is expected to increase by 1800 animals by the year 2000 under the preferred alternative This is an ambitious, but reasonable and possible, projection Forest Service administered lands are not expected to compensate for all wildlife habitats which are eliminated on private lands

7 Wildlife and fish benefits are valued at approximately $21/day in the FEIS They are part of the recreation output potential expressed as Recreation Visitor Days

8 Managment Area Prescription 5B (Emphasis is on Big Game Winter Range in Forested areas) has been allocated to big game winter range areas on the northeastern and northwestern lower slopes of Quail Mountain See the Forest Plan Map Slopes above winter range areas on Quail Mountain have been allocated to Management Area Prescription 1B-2 which provides management direction and emphasis for potential winter sports sites See Chapter III, Management Direction, Forest Plan, and Appendix G, FEIS

9 See response to Number 8 above

10 This Management Area Prescription change has been made See the Forest Plan Map, and Appendix G, FEIS

11 The area south from Big Union to Sawmill Gulch has been allocated to Management Area Prescription 5B Management Area Prescriptions 4B, 4D, and 7D allocated to the remainder of the area contain management requirements and direction that is compatible with big game winter range requirements

12 This area has been allocated to Management Area Prescription 3A (Emphasis is on semiprimitive nonmotorized recreation in roaded or nonroaded areas) See the Forest Plan Map

13 This area has been allocated to Management Area Prescription 5B with emphasis on big game winter range management See the Forest Plan Map

14 Pony Park winter range is in a 5B winter range management area Portions of the Mud Hill area have been allocated to 5B and 4B wildlife emphasis management areas See the Forest Plan Map

15 Lands used by deer and elk are also important for other Forest resources, such as livestock grazing in the Black Mountain area Very little of 39-Mile Mountain is elk winter range The 4B Prescription emphasizes habitat management for Management Indicator Species including deer and elk

Incidentally, the area five miles southwest of Fairplay is shown as 3-B on the map. No such designation is footnoted 16

We are concerned that the issue of Heli-ski operations has not been addressed This has been a topic of intense discussion over the past several years and the Division feels that our efforts in sheep transplant operations and wintering elk are being adversely impacted We feel that this issue is important enough to be addressed in the management plan. 17

The Buffalo Peaks remains an area of critical concern to us. A wilderness designation would be acceptable in order to protect a highly important bighorn sheep herd. If wilderness designation is not possible, then grazing should be eliminated in the alpine zone and drastically reduced elsewhere.

For all of these areas we, again, express concern that enforcement is necessary for proper management. Without increased enforcement capabilities, few of these objectives can be met. 18

We are favorable towards the Sangre de Cristo Wilderness Study Area Alternative No. 2 with boundary modification The details of this designation need to be discussed as there are areas we wish to continue browse manipulation. Specifically, we oppose the Black Canyon designation unless we can gain one-half mile additional access Similarly, Piney Creek should be excluded from wilderness designation to allow the Division of Wildlife to continue manipulation of browse. 19

We are dubious of the benefits of allowing grazing or timber cutting in areas historically undisturbed such as Marshall Pass. These areas are by in large summer and fall elk range as well as significant habitat for many other species. Any drastic change in management techniques should be closely followed and be flexible enough to change if adverse impacts are noted. 20

There are some areas we would suggest additional timber harvest which will benefit wildlife. The areas south of Silver Creek road between Mosquito Pass road and Silver Creek Lakes, the north side of Methodist Mountain, and Loco Ridge south of Jackrabbit Hill would all be acceptable for timber harvest. 21

Throughout the plan, we feel that timber cuts should be irregular 20 to 40 acre treatments with timber left standing in the center and maximum snag maintenance Also, the lumber contractors should close all roads at the end of the contract and reseed whenever possible. This will allow for utilization of timber resources with minimum wildlife impacts. 22

FOREST SERVICE RESPONSE

16 The Forest Plan map was intended to display Prescription 9B This has been corrected

17 Activities such as helicopter-ski operations which can adversely affect bighorn sheep and elk, will be managed according to management requirements contained in Chapter III of the Forest Plan

18 The Forest Service has recommended Buffalo Peaks Wilderness Study Area as suitable for wilderness designation with a boundary modification See Forest Plan Map

19 The boundaries have been modified in both areas to address these concerns See Forest Plan Map

20 Grazing and logging are historic resource activities in the Marshall Pass area Management in the area will consider the habitat needs of Management Indicator Species as well as other Forest resource needs

21 These areas are being evaluated to determine possible treatments to improve wildlife habitat

22 Where clearcutting is practiced, timber harvest unit size will generally be less than 20 acres to provide better edge habitat, maintain hiding cover and openings, improve water yield, and opportunity for successful natural regeneration See Forest Plan, Chapter III, the section on FOREST DIRECTION, (Wildlife and Habitat Improvement and Maintenance)

LETTER L-2 continued

Other areas of concern are those portions of Four-mile/Seven-mile Creeks between two current 5-B designations That area is probably better winter range than some of the designated lands. 23

We are also concerned with the proposed 275 acres of timber cutting in Morgans Gulch off South Cottonwood Creek with associated road construction This area should remain undisturbed as it is the only major basin in this area without a road. Increased water production does not outweigh other considerations. 24

The Comanche National Grasslands are very important to us. Here again, we feel that increased habitat diversity may not be indicative of good wildlife management. This is particularly true if this diversity is achieved by increased grazing. Additionally, we would like to see a complete explanation of the types of rangeland improvements to be used. We would, in most cases, be opposed to any large scale treatments as these are potentially damaging to wildlife Also, the listed indicator species (Pg. 121, RPM) may not reflect all wildlife needs on the grasslands 25 26

In summary, we would like to see wildlife resources treated more on par with other considerations. Timber cutting, mineral extraction, grazing, and recreation are certainly important factors, but wildlife is historically a critical factor in forest management. Even if taken from a purely cost/benefit standpoint, hunting, fishing, and associated wildlife recreation is obviously very important. 27

Despite our numerous comments, the plan is very well done and addresses most major issues. We are very pleased to be able to comment and hope to work with this issue in the future.

Sincerely,

Steven J. Bissell
Land Use Coordinator

ag

cc: Jack Grieb
Bob Evans
Pete Barrows
Bruce McCloskey
Tom Lytle

FOREST SERVICE RESPONSE

23. This area has been allocated to Management Area Prescription 4B (Emphasis is on habitat for Management Indicator Species) Management requirements in this prescription provide necessary protection for big game management needs

24 This timber sale has been dropped from the timber sale schedule The Forest Plan interdisciplinary team, after on-site field examination, recommended deletion of the sale High road construction costs, key wildlife values, and the undisturbed nature of the drainage were factors in this determination

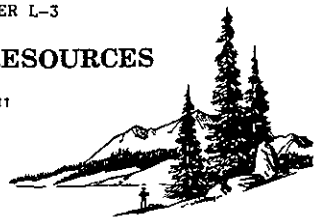
25 We agree Increasing habitat diversity in every case may not be the best situation for all wildlife species Structural improvements include fencing, water developments such as wells, pipelines, pit tanks and springs along with non-structural improvements which might include reseeding, brush control by mechanical methods or controlled burning, and pitting as only some of the rangeland improvements employed All wildlife improvement projects are covered in the State Comprehensive Wildlife Habitat Improvement Plan prepared jointly by the Division of Wildlife and the Forest Service

26 The Management Indicator Species list has been expanded Other species are considered on a case-by-case basis

27 See response Number 1 above

LETTER L-3

STATE OF COLORADO RICHARD D LAMM Governor
DEPARTMENT OF NATURAL RESOURCES
D MONTE PASCOE Executive Director
1313 Sherman St Room 718 Denver Colorado 80203 866-3311



Geological Survey
Board of Land Commissioners
Mined Land Reclamation
Division of Mines
Oil and Gas Conservation Commission
Division of Parks & Outdoor Recreation
Soil Conservation Board
Water Conservation Board
Division of Water Resources
Division of Wildlife

December 14, 1982

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

Dear Mr. Morgan:

We appreciate the opportunity to comment on the Draft Environmental Impact Statement and Proposed Plan for the Pike and San Isabel National Forests. This letter and its attachments constitute the comments of the State of Colorado.

I would like to point out two issues of special concern to the State that are raised by the DEIS and Proposed Plan: timber sales and wilderness designations.

VI-195

Timber Sales.

On April 21, 1982, the Lake County Commissioners wrote a detailed and thoughtful letter expressing the view that proposed timber sales would harm the scenic qualities of the county and injure the tourist trade, which is increasingly important to Lake County. The DEIS and Plan do not adequately address the concerns raised by the letter. 1

In view of the dramatic increase in timber sales planned for the Forest, we would suggest that the rationale for timber sales should be explained more fully. For example

- Water Yield Enhanced water yields is the first-listed objective of the Proposed Plan. (DEIS, p. 30). Yet the increases appear to be less than 2% of total current yield. Is enhanced water yield, in fact, a major reason for the sharp increase in timber cuts? How reliable are the estimates of increased water yield? Can research results be replicated in the highly-varied conditions that will be encountered in the field? 2

- Demand for Timber. The DEIS assumes an infinitely elastic demand for timber. What evidence is there that this will be the case for the long period of time covered by the Plan? 3

FOREST SERVICE RESPONSE

1 The Forest Plan and FEIS now contain additional discussions that better address the need for vegetation management and the multiple resource benefits that accrue Chapter II, Forest Plan and Chapters II, III and IV of the FEIS more fully address the benefits of vegetation treatment as well as the consequences of not managing vegetation

Management Area Prescriptions near Leadville in Lake County, that emphasized vegetation treatments designed for increased water yield have been replaced with prescriptions that emphasize recreation opportunities The Forest Plan map reflects these changes

2 The estimates for water yield are accurate within plus or minus 25 percent Increased water yields were a consideration, however, they were not the only factor Maintaining a healthy forest, scenic values and how they can be maintained or improved, wildlife habitat diversity, aspen regeneration and many other factors were considered in the planning process as timber harvest levels were developed

3 The assumptions for timber demand are an estimate which becomes less precise the farther they are projected into the future

Timber Sales (Continued).

- o Scenic Impact Can clearcuts be designed to minimize impact on the scenery? What specific guidelines will the Forest use to mitigate such impacts? Has the Forest Service attempted to assess the impact of clear curs on tourists and on the tourist industry, for example, to balance the economic benefits of increased yields against possible losses to the tourist industry? 4

We would suggest that the Forest Service meet with Lake County officials and us to respond to these questions and other concerns that have been raised about the scale of the proposed timber sales 5

Wilderness

We are pleased to see a wilderness recommendation for Greenhorn Mountain In the RARE II study, the Forest Service also recommended wilderness designation for Buffalo Peaks and Spanish Peaks, as well as 218,000 acres in the Sangre de Cristos The DEIS now recommends no wilderness in the Buffalo Peaks and Spanish Peaks and only 188,000 acres in the Sangre de Cristos. The Wilderness Study Reports do not explain adequately why the Forest Service has changed its recommendations Governor Lamm endorsed the RARE II designations and continues to support these proposals 6

The Wilderness Study Report for Buffalo Peaks suggests three reasons for non-designation the desire to manage wildlife habitat, to harvest fuelwood, and to increase water yields According to the Division of Wildlife, the outstanding wildlife resource in the area is the bighorn sheep herd, and there is no need for active habitat management in the vast bulk of the WSA. Given the sharp increases in timber cuts planned for the rest of the Forest, it is difficult to understand why this area is needed for timber production. And water yield increases are small, uncertain, and not an adequate justification for non-designation As the report states, the most positive cost-benefit ratio is for designation. 7

The Wilderness Study Report on the Spanish Peaks suggests two reasons for non-designation that are particularly puzzling The report suggests a need for timber cuts to enhance water yield This raises, again, the question of tradeoffs between water yields, which may be marginal and uncertain, and scenic impacts on one of the outstanding features of the Forest The report also suggests that designation would not increase the variety of landforms within the wilderness system, notwithstanding the fact that the volcanic dikes are a designated National Landmark As with Buffalo Peaks, the cost-benefit calculations are favorable to designation. This and the proximity of the area to population centers are strong arguments that should weigh in favor of designation. 8

FOREST SERVICE RESPONSE

4 Clearcuts can be designed to soften the effect on scenic values Their size, shape, and location can all be varied to meet various objectives Visual management is a major consideration in timber sale layout and design

5 The Forest Supervisor has been corresponding with county officials On April 19, 1984, the Forest Service met with Lake County officials to discuss these concerns The Forest Service met with State representatives May 4, 1984 to discuss the Forest Plan and EIS Coordination is an on-going activity which is formalized in a Memorandum of Understanding, dated July 13, 1982, between the Forest Service and State of Colorado

6 The Wilderness Study Area reports have been rewritten Emphasis was placed on presenting a better explanation of the reasons for departing from the 1979 RARE II recommendations See Appendix C, FEIS

7 A portion of the Buffalo Peaks Wilderness Study Area (36,060 acres) is recommended as suitable for inclusion in the National Wilderness Preservation System in the Final EIS and Forest Plan For the remaining portion, management emphasis would not include motorized recreation activities Roads developed for resource management purposes, would be closed when no longer needed The long-term sustained yield of timber products from the non-wilderness portion is significant

8 The timber cutting for enhancing water yield discussion is not stressed in the Final Wilderness Study Report The statements concerning landform have been revised in recognition of the uncommon landform characteristics of the Spanish Peaks area

Additional Comments.

The Plan would require a significant increase in your budget. If this does not happen, the Plan must be changed and some of the planned benefits will not occur. We would urge you to keep Forest users, local governments, the state government, and any advisory groups you may have organized informed as you seek the funds to implement the Plan, and to involve them in making any changes if funds are not available. 9

The DEIS and Plan do not contain an adequate discussion of air quality The comments of the Department of Health, attached, suggest a possible approach to this topic. 10

Sincerely yours,

D. Monte Pascoe
Executive Director

DMP:bck

Attachment

FOREST SERVICE RESPONSE

9 The Forest Plan is the basis for budget proposals to Congress Only Congress can determine the level at which the Forest Plan will be funded

10 See letter L-8, response numbers 1 and 2

RICHARD D LAMM
Governor

JERIS A. DANIELSON
State Engineer

LETTER L-4

OFFICE OF THE STATE ENGINEER
DIVISION OF WATER RESOURCES

1313 Sherman Street-Room 818
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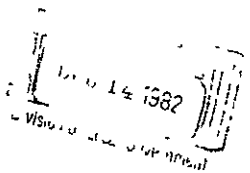
(303) 866-3581

December 14, 1982



MEMORANDUM

TO: Stephen O. Ellis, State Clearinghouse

FROM: Hal D. Simpson, Assistant State Engineer

SUBJECT: Draft Environmental Impact Statement for the Pike & San Isabel Forest and Comanche & Cimarron National Grasslands, Management Plan for the Pike & San Isabel National Forest

VI-198

As requested, we have reviewed the above referenced draft environmental impact statement and management plan. We agree with the EIS comment that all water yield increases that can be realized are needed to supply current and predicted demands for water. However, since the variation in water yield between the alternatives is only 6,000 acre-feet, we do not believe any alternative is better than another. 1

We are concerned about the impact that a National Wild and Scenic River recommendation on the South Platte would have on existing and conditional (undeveloped) water right holders. Also, how will the Forest Service mitigate possible impacts to water rights if the Sangre De Cristo area is designated as a wilderness area? 2

The management plan comments in several places about the appropriation of water under the reservation doctrine. What uses of water does the Forest Service foresee under this doctrine? What potential impacts on the water resources and water rights in Colorado might be expected? 3

We have no other specific comments about the management plan or Draft Environmental Impact Statement. We would not object to any of the various alternatives considered provided the above concerns are adequately addressed and provided

1. The management plan is administered in compliance with all applicable statutes of the State of Colorado regarding water use. 4

2. The streamflow pattern regiment remains the same. (This management plan indicates the regiment will remain the same.) 5

FOREST SERVICE RESPONSE

1 No response necessary

2 The Congressional designation of Wild and Scenic River classification does not preclude existing water rights The Forest Service would then have no need to take any action regarding water rights

3 On July 3, 1978, the U.S Supreme Court 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

4 The Plan is in compliance with all applicable statutes of the State of Colorado regarding water use

5 The Plan provides management requirements that set minimum conditions that must be maintained while achieving the goals and objectives of the Forest Forest goals and objectives are displayed in the Plan, Chapter III, Management Direction Streamflow pattern regimen protection and maintenance is provided for in Forest Direction and Management Area Prescriptions