

**APPENDIX B**  
**CONSIDERATION OF COMMENTS**  
**MONARCH PASS VEGETATION MANAGEMENT PROJECT**  
**SAN ISABEL NATIONAL FOREST**

The comment period was conducted from May 8, 2017 to June 9, 2017. A total of nine comment letters were received. Below are the consideration of comments received.

Index of Letters:

<b>Letter No.</b>	<b>Author</b>	<b>Organization</b>	<b>Date</b>
2	Burton, Chuck	PSI – RAC	2017.05.15
5	Goodwin, Neilie	Western Area Power Administration	2017.06.08
4	Hardgrave, Kathryn	Colorado State Forest Service	2017.06.06
1	Lange, Damon	Colorado State Forest Service	2017.05.08
6	Maxwell, Kent	Colorado Firecamp	2017.05.09
7	Myers, Karl	Tri-State Generation and Transmission Association, Inc.	2017.06.09
3	Pressly, Scott	Monarch Mountain	2017.05.24
9	Sailor, Rand		2017.06.23
8	Sobal, Tom	Quiet Use Coalition	2017.06.09

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
D.Lange1	Looks like a very fine project.	Supportive comment.	Project
C.Burton1	This email is in support of your proposed spruce beetle management efforts, i.e. sanitation and salvage of the trees in the Monarch Pass area.	Supportive comment.	Project
S.Pressly1	<p>I am writing on behalf of Monarch Mountain in support of the proposed Monarch Pass Vegetation Management Project.</p> <p>While these tactics are helping to protect our infrastructure, a larger plan such as the Monarch Pass Vegetation Management Project must be considered for the overall health of the forest and improved margin of safety for our operations here on Monarch Pass.</p> <p>The proposed project is an excellent step towards mitigating the beetle infested tree issues here on the pass and helping to maintain a viable ski area business here at Monarch. Monarch Mountain approves of this proposal to remove insect infested and susceptible trees in the Monarch Pass area, including the Monarch Mountain ski area.</p>	Supportive comment.	Project
S.Pressly2	While the Categorical Exclusion may begin to address the trees in direct proximity to the infrastructure located on Monarch Pass, the adjacent portions of the forest such as Old Monarch Pass area to the west of the ski area and Fooses Creek should be considered for additional mitigation work in the future.	Old Monarch Pass is included in the project area and the initial project area was expanded to include the area north of the Waterdogs Lake trail. The Forest has talked with the Gunnison NF regarding potential projects west of the ski area. Currently, no projects are planned outside of the SBEADMR project due to slope and erosive soil issues.	Project boundary
K.Hardgrave1	<p>After attending the open house and field trip hosted by the Salida Ranger District, it is my opinion that the proposed actions will kick start a healthy, new forest where the majority of trees are dead or dying. In areas with less tree mortality, the proposed work will increase tree diversity and improve individual tree health thereby promoting forest resilience.</p> <p>The silvicultural prescriptions are flexible enough to be applicable on different aspects, varying density of trees, and species. The project can create a mosaic of wildlife habitat useful to different species over several decades. Leaving some material on the ground will provide microclimates and protection to new seedlings. Removing material that has value will help fund the project and may very well reduce the severity of a wildfire thereby protecting the soils and water quality.</p>	Supportive comment.	Project

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N.Goodwin1	<p>I'd just like to submit my comment of support for the Monarch Pass Vegetation management Project. As a Vegetation Management Specialist, I feel this project is a step in the right direction for the protection of crucial infrastructure for the community and surrounding areas.</p> <p>This project will further protect the two Western Area Power Administrations (Western) powerlines, North Gunnison-Salida 115kV, and Curcanti-Poncha 230kV that run through and near this project. This is extremely important to the Department of Energy (DOE), as these two powerlines are crucial for the reliability of the grid, and we simply can't afford to lose them to wildfire, or dead and dying trees falling into the conductors.</p>	Supportive comment.	Project
K.Maxwell1	The 2017 draft of the Maysville-Monarch Community Wildfire Protection Plan (CWPP) will include the MPVMP as a prioritized hazardous fuel reduction treatment protecting our at-risk community and essential infrastructure.	The inclusion of the Monarch Pass Vegetation Management Project into the Maysville-Monarch Community Wildfire Protection Plan shows support for the project.	Project
K.Maxwell2	The MPVMP boundaries should include the entire drainage (excluding mining claims) to the town of Garfield (Monarch), proposing mechanical and manual treatments in the lodgepole and spruce/fir stands, especially concentrating on preventing conversion of mature aspen stands to conifer. Basically, I suggest extending the project from the Waterdog Lakes trail/power line to the confluence with the Middle Fork drainage, which should still be below the 3,000 acre limit and remain within a single watershed. Attached is a pic from Google Earth showing the area of concern.	The project was expanded to include some of the area north of the Waterdog Lakes trailhead. However, acre limits associated with the Farm Bill authority did not allow the project to be expanded to the town of Garfield (Monarch).	Project boundary
K.Myers1	Tri-State supports the Monarch Pass Vegetation Management Project and commends the Forest Service for identifying a project that will improve forest conditions, help the South Arkansas River headwaters and benefit an important recreation facility to the area. The proposed action will remove acres of dead and dying spruce/fir and lodgepole pine trees decimated by the spruce beetle infestation.	Supportive comment.	Project
K.Myers2	Of particular interest to Tri-State is Western Area Power Administration's Poncha-Curecanti 230kV transmission line that crosses the subject project area. This is a crucial component of the interconnected electric grid that helps Tri-State deliver reliable power to our members in the area. We recommend that vegetation treatments in the project area include	The proposed action for the project has been developed to improve forest health, reduce the area's susceptibility to high intensity wildfire and provide	Proposed action

COMMENT	COMMENT	CONSIDERATION OF COMMENT	SUBJECT
	improving forest conditions adjacent to the transmission line right-of-way, thereby breaking up the continuity of fuels to help reduce the threat from approaching wildfires.	opportunities for firefighters to safely engage a wildfire, should it occur.	
K.Myers3	Tri-State encourages the Forest Service to continue to work in a collaborative fashion to identify other worthy vegetation management projects. Tri-State's Poncha-San Luis Valley 230kV line crosses the Pike-San Isabel National Forest is of critical importance to the San Luis Valley. A project in the Cleveland Mountain area adjacent to our transmission corridor would reduce the risk or extent of, or increase the resilience to, insect or disease infestation in the area and address a critically important wildland-urban interface.	The Forest Service continues to work on environmental analysis for priority project areas as funding and personnel allows. The Cleveland Mountain area has been identified as a priority project area.	NEPA
T.Sobal1	<p>We question if a Categorical Exclusion is the appropriate level of analysis for this proposal.</p> <p>We believe that the following six extraordinary circumstances exist within the project area which must be fully considered for this project, and these circumstances likely preclude the use of a CE.</p> <p>The possible presence of Canada Lynx requires additional analysis</p> <p>Possible impacts on two (or more) Region 2 Regional Forester's Sensitive Species require additional analysis</p> <p style="padding-left: 40px;">According to FSM Supplement No.: 2600-2011-1, 2672.11 – Exhibit 01, the following are Region 2 Regional Forester's Sensitive Species, and there is evidence that they occur within the project area: --</p> <p style="padding-left: 40px;"><i>Lagopus leucura</i> white-tailed ptarmigan</p> <p style="padding-left: 40px;"><i>Ovis canadensis canadensis</i> Rocky Mountain bighorn sheep</p> <p>The following sensitive species may occur within the project area, and additional analysis is needed to determine this:</p> <p style="padding-left: 40px;"><i>Accipiter gentilis</i> northern goshawk</p> <p style="padding-left: 40px;"><i>Buteo regalis</i> ferruginous hawk</p> <p style="padding-left: 40px;"><i>Martes americana</i> American marten</p> <p style="padding-left: 40px;"><i>Falco peregrinus anatum</i> American peregrine falcon</p> <p>Potential impacts on a municipal watershed require additional analysis</p> <p>The presence of the Continental Divide National Scenic Trail (CDNST) must be fully considered.</p>	<p>The Responsible Official has reviewed the criteria associated with the Categorical Exclusion. Analysis of the effects on resources have been documented in the appropriate specialist report.</p> <p>A biological assessment (BA) was completed for Canada lynx. The final determination was "<i>May affect, not likely to adversely affect.</i>" The project received concurrence from USFWS on January 5, 2018.</p> <p>A biological evaluation was completed for Region 2 Regional Forester's Sensitive Species – wildlife.</p> <p>Flood plains, wetlands and other riparian area will be protected through design criteria listed in the decision memo.</p> <p>The South Fork Arkansas River is not within a designated municipal watershed. However, it is considered a source water area by the Colorado Department of Health and Environment (CDHPE). Treatments are designed to reduce fuel loading and potential effects from high intensity wildland fire within the</p>	<p>NEPA</p> <p>Canada Lynx</p> <p>Wildlife</p> <p>Botany</p> <p>Watershed</p> <p>CDNST</p> <p>Cultural Resources</p>

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	<p>The Monarch Pass Game Drive Archaeological area requires additional analysis</p> <p>The Colorado Natural Heritage program has identified 500 acres of the project area as habitat for imperiled plants.</p> <p style="padding-left: 40px;">These plants include the globally vulnerable reflected moonwort (<i>Botrychium echo</i>), the globally vulnerable Colorado Divide whitlow-grass (<i>Draba streptobrachia</i>) and the state imperiled least moonwort (<i>Botrychium simplex</i>). This project must be planned and implemented to avoid and minimized individual and cumulative impacts to these species.</p>	<p>watershed. The Upper Arkansas Water Conservation District was consulted as part of the collaboration process for developing the project and is in support of the vegetation management treatments.</p> <p>The presence of the CDNST was considered and evaluated in the Recreation and Trail Report. See T.Sobal2 for additional information.</p> <p>A biological evaluation was completed for plant species within the project area. The three plants listed are not the Regional Forester sensitive species list, are not known to be present in the project area, and have numerous sites elsewhere across the state.</p>	
T.Sobal2	<p>At the very least, treatment of lands within the potential CDNST management area within one half mile on either side of the trail must be prohibited in vegetation management proposals. FSM 2353.44b 7 states "The one-half mile foreground viewed from either side of the CDNST travel route must be a primary consideration in delineating the boundary of a CDNST management area." Lands within one half mile of the CDNST must be excluded from proposed treatment until a CDNST unit plan and management area are completed.</p> <p>Proposals should not consider any treatment of vegetation within one half mile of the trail if the treatment would have impacts on natural or scenic features. The CDNST is a concern level 1 travel route, and the scenic integrity objective is to be high or very high depending on the CDNST segment.</p> <p>In addition, treatment of areas of land further than the visual foreground of the trail, middle ground areas up to 4 miles away, must be considered for their impacts to the CDNST. A District Visual Quality Monitor must be consulted to assist in determining the visual impacts of treatments and ensure Visual Quality Objectives (VQO) are met.</p>	<p>The CDNST was reviewed as part of the analysis process. As stated in the Recreation and Trail Report (located in the Project Record), "On National Forest System lands, the visual resource inventory will follow the procedures outlined in Forest Service Manual 2380, and appropriate handbook guidelines. The CDNST is a concern level 1 travel route, and the scenic integrity objective is to be high or very high depending on the CDNST segment. Much of the area proposed for treatment in the project area, within the corridor of the CDNST that can be seen from the trail is located within the Monarch Ski Area SUP. This area had been substantially modified prior to the establishment of the CDNST in its current location. Additional sections, south of Monarch Ski Area, are located on the west-side of the actual divide and the</p>	CDNST

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		project area cannot be seen from this side.”	
T.Soba13	The fire danger of Beetle killed trees is not as great as many believe. Beetle kill trees retain needles for 2 years after death. After dead needles fall off, stands of dead trees are not likely to burn and the fire danger decreases greatly because the volatile oils present in needles are no longer present. Live and healthy trees will burn and often burn more intensely than beetle-killed trees.	The intent of the treatments is to improve firefighter safety in the event of a wildfire. Spruce beetles weaken trees. If fire were to occur in those trees, the threat to firefighters from falling trees would be high. As a result, fire managers would be unlikely to use direct suppression tactics on fires within spruce beetle killed forests.  Removing (salvage) of spruce beetle killed trees increases the safety of the firefighters in the event of a fire and provides them with opportunities to fight the fire.	Fire/Fuels Firefighter Safety
T.Soba14	Standing dead and down dead trees are ecologically valuable.	There is ecological value for snags and dead down woody material. The Forest Plan provides guidance on the minimum requirements for snags (2 snags/acre; Forest Plan, pg. III – 13) and coarse woody debris (50 linear feet/acres; Forest Plan, pg. III –13). The design criteria in the decision memo exceeds the Forest Plan guidance. See Design Criteria #25 and 26.	Ecological importance of snags and down wood
T.Soba15	Locations where forest fuel treatments are most appropriate: Home ignition zone and near significant infrastructure (a 30-meter defensible space around these) Within 1-200 meters of infrastructure, partial tree removal is recommended to create a safety zone Removal of hazard trees near infrastructure and facilities. Removal of insect and disease killed trees in areas of heavy mortality to reduce fuel continuity and intensity. Locations where forest fuel treatments not appropriate: Subalpine zones above 9000 feet are not outside the range of natural variability and thus do not need to be restored. Backcountry type areas away from the Wildland Urban Interface.	Treatments are proposed within and adjacent to significant infrastructure including: Monarch Mountain Ski area, Monarch Park Campground, adjacent to multiple electric transmission and distribution lines, and adjacent to Colorado State Highway 50.  The area has seen significant mortality throughout the area and adjacent to the area listed above.  Wildfire and forest operations both remove vegetation and disturb forest soils,	Proposed action

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	<p>Logging is not necessary to protect a watershed. Fuel treatments would likely result in the same negative effects as wildfire (increased soil erosion and the need for additional roads).</p>	<p>which can lead to an increase in water yield and an increased risk of soil erosion. Research from the Fraser Experimental Forest in Colorado indicates that water yield increases are often not detectable or statistically significant until 25 percent or more of the basal area has been removed (FSH 2509.25). Timber operations to reduce forest fuel loads will reduce the risk of a high severity wildfire. However, timber operations also create new roads and skid trails which are a major source of sediment in forested watershed. Erosion rates from these areas are generally highest during road construction and generally decrease over time as disturbed areas are stabilized by revegetation (MacDonald and Stednick 2003). No new permanent roads are proposed under this project. All temporary roads will be decommissioned within 3 years of project completion. Sediment delivery from these temporary roads may add to the sediment budget, but this would be a short-term impact. Soil erosion modelling using the WEPP (Water Erosion Prediction Project) model found that carefully planned timber operations with adequate riparian buffers resulted in lower long-term erosion rates than those following wildfire (Elliot and Robichaud 2001).</p>	
R.Sailor1	<p>If you can go in and cut down the dead and infected trees, get them off Monarch you can hope to slow the infestation. This may be too much to ask.</p> <p>It doesn't look like to me that you can conquer the beetle by following it – you have to get ahead of it.</p>	<p>The project will remove dead and infested trees throughout the project area. Where green trees exist (that do not contain beetles) every effort will be made to protect those trees.</p>	Project

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	<p>Catch the beetles in the green infected trees and cut them before the beetle flies that summer. This is a task that is much easier to talk about than it is to enact. Thank you and best to the SINF.</p> <p>Please help save our forest by removing the dead and infected trees.</p>		

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**PRE-SCOPING – COLLABORATION COMMENTS**

The collaboration meetings were held from February 14, 2017 to May 23, 2017 with interested working groups. A list of the working groups is below.

Index of Meetings:

<b>Organization</b>	<b>Meeting Date</b>
Quiet Use Coalition - Tom Sobal	2017.02.14
Monarch Mountain Ski Area	2017.02.16
Colorado Department of Transportation (CDOT)	2017.02.23
Upper Arkansas Water Conservancy District (UAWCD)	2017.03.09
Chaffee County Board of Commissioners (BOC)	2017.05.08
Colorado Parks and Wildlife (CPW)	2017.05.23

Organization	Issues / Thoughts	How Issues / thoughts were addressed during development of the project
Forest Service (Internal)	The project is located in Canada lynx habitat	A biological assessment will be completed for the project and sent to the USFWS for concurrence prior to completion of the decision memo. As part of the project, regeneration will be protected where feasible.
	Insect and disease has effected the spruce – fir located throughout the area.	The proposed action for the project has been developed to salvage dead and dying trees, thin stands susceptible to insect and disease activity, and reduce insect and disease impacts to smaller diameter trees.
	A wildfire in infected stands could impact Monarch Ski area, powerlines, Highway 50 and firefighter safety.	The proposed action for the project has been developed to reduce the area’s susceptibility to high intensity wildfire and provide opportunities for firefighters to safely engage a wildfire, should it occur.
	Increase in post-fire sedimentation run-off and impacts it may have to water conveyance structures.	The project will not include broadcast burning. In the event of a wildfire, BAER resources will be utilized to mitigate post-fire sedimentation issues, where possible. The proposed action has been expanded to include erosion/sedimentation mitigation projects to reduce impacts currently occurring.
	Dead trees pose hazards to infrastructure at Monarch Ski area, powerlines and Highway 50.	The proposed action for the project has been developed to reduce the number of hazard trees located adjacent to infrastructure located within the project area.
Tom Sobal – Quiet Use Coalition	The Continental Divide National Scenic Trail (CDNST) is located within and adjacent to the project area.	The CDNST will be reviewed and analyzed as part of the Recreation and Trails Report.
Monarch Mountain	Interested in vegetation management on the Gunnison NF in the No Name area.	The Forest has talked with the Gunnison National Forest regarding potential projects west of the ski area. Currently, no projects are planned outside of the SBEADMR project due to slope and erosive soil issues. The Monarch Pass Vegetation Management Project will focused on the San Isabel National Forest side only.
	Interested in removal of hazard trees in summer 2017, especially adjacent to Panorama lift.	Letter was issued from the PSICC Forest and Grassland Forest Supervisor that provides direction to Monarch Ski area to be able to remove hazard trees in 2017.
	Need to provide protection of regeneration in Monarch Ski area (both planted and natural regeneration).	As part of the project, the Forest Service will work with Monarch Ski area to implement winter activities (e.g., rope fences, etc.) that will protect regeneration within

Organization	Issues / Thoughts	How Issues / thoughts were addressed during development of the project
		the ski area. Where possible, regeneration will be protected during harvest activities.
	Need to provide public education on why tree islands are roped off. Monarch is interested in assisting with public education.	The Forest Service will work with Monarch Ski area to protect tree islands and provide public education on the vegetation management occurring in the area.
	Need to determine cost of operations within Monarch Ski area to remove trees.	The San Isabel NF worked with the Forest Service's Region 3 Forest Operations Specialist to determine cost effective alternatives to remove trees from steep slopes. Steep slope systems include: cut-to-length and other aerial systems.
CDOT	Interested in vegetation management on the Gunnison NF.	The Gunnison NF has current NEPA for the area; it is the Spruce Beetle Epidemic and Aspen Decline Management Response (SBEADMR) EIS. The Monarch Pass NEPA will be focused on the San Isabel NF only.
	Concerns include logging trucks entering highway, the need for logging trucks to turn around and associated safety concerns.	Where needed, the Forest Service/contractors will work with CDOT to ensure safety issues associated with log trucks entering or turning around on Highway 50 are addressed.
	Traffic control needed to remove hazard trees adjacent to Highway 50. CDOT does not have the staff to assist with traffic control operations.	<p>The following contract provision is located in Forest Service timber sale contracts: BT6.33 Safety – “... <i>when Purchaser's Operation are in progress adjacent to or on Forest Service controlled roads and trails open to public travel... Purchase and Forest Service shall agree to a specific Traffic Control Plan for each individual project prior to commencing operations.</i>” This contract provision applies to Forest Service roads, not State Highways. Contractors are not set up to do traffic control on State Highways.</p> <p>Recommendation – CDOT provides Traffic Control for tree removal adjacent to highway or leave buffer along highway so traffic control is not required.</p>
	Interested if treatments would create new avalanche paths.	Multiple factors influence whether and how a slope avalanches, including: temperature, wind, slope, orientation, terrain, vegetation and snowpack conditions. It is possible that forest harvesting on steep slopes in

Organization	Issues / Thoughts	How Issues / thoughts were addressed during development of the project
		areas of high snow supply can create new avalanche start zones. Due to the multiple factors that influence avalanches, it would be difficult to analyze where new avalanches could occur.
	Concerned about increased erosion from treatments; includes movement of larger material, such as logging debris.	Activities have been added to the proposed action to reduce current erosion that is occurring. Design criteria #13 – 18 were also added to the decision memo to limit sedimentation from vegetation management activities.
UAWCD	Concern included maintaining future water supply through better forest health.	The goal of the project is to improve forest health by increasing both age class and species diversity and to reduce fire severity in the project area. Both of these would contribute to maintaining the future water supply in the area.
	Interested if the project would include North Fork and Boss Reservoirs. Also interested in the Cottonwood Pass area.	Current Farm Bill authority directs the Forest Service to conduct analysis by watershed. Cottonwood Pass, North Fork and Boss Reservoirs are not in the same watershed as Monarch Pass. Future analysis may cover these areas.
	Interested if we are going to re-seed (plant trees).	"Re-seeding" or planting of trees may take place as part of this project and is included in the proposed action for the project.
	Interested in putting a surface flow gauge in place after treatments take place.	Additional discussions will be needed in the future with Forest Service personnel prior to the establishment of a surface flow gauge within the project area.
BOC	Concerned with spreading spruce beetle to other areas.	The Forest Service is actively managing the area to try and prevent fuelwood infested with beetles from being moved from the site. Harvesting of timber will knock limbs and bark from the boles, reducing the likelihood that beetles will be transported from the area.
	Interested in treating other priority areas, such as Cottonwood Pass/Cottonwood Creek area.	The Forest Service is looking at other accessible areas for future vegetation management treatments.
CPW	Ensure temporary roads are decommissioned and closed.	As part of the Farm Bill direction, all temporary roads will be decommissioned and closed within 3 years of project completion.
	Ensure no new mountain bike trails are created in the project area.	The project does not intend to create new mountain bike trails. All temporary roads will be decommissioned and

Organization	Issues / Thoughts	How Issues / thoughts were addressed during development of the project
		closed within 3 years of project completion. Activities that decommission the roads discourage use by wheeled vehicles.
	Maintain lynx habitat.	A biological assessment will be completed for the project and sent to the USFWS for concurrence prior to completion of the decision memo. As part of the project, regeneration will be protected where feasible.
	Maintain diverse habitats (i.e. habitat for big horn sheep) including retaining areas that contain down wood, large snags and other unique features that attract wildlife.	Design criteria #25 and 26 were added to the final decision memo to ensure adequate snags and down wood are retained throughout the project area. Design criteria #27 and 30 also protect trees with cavities and nests and seedling/saplings.
	When implementing the project, avoid opening day/opening weekend of archery and muzzleloader season.	Design criteria #22 was added to limit conflicts during opening day/opening weekend of archery and muzzleloader season.
	Avoid increasing sedimentation into the South Arkansas River.	Activities have been added to the proposed action to reduce current erosion that is occurring. Design criteria #13 – 18 were also added to the decision memo to limit sedimentation from vegetation management activities.
	Ensure protection of regeneration.	Design criteria #30 was added to limit impacts/damage to natural regeneration.  As part of the project, the Forest Service will also work with Monarch Ski area to implement winter activities (e.g., rope fences, etc.) that will protect regeneration within the ski area.
	Implement timing restrictions associated with calving or lambing seasons.	Design criteria #23 was added to restrict harvest activities in identified calving or lambing areas during calving/lambing season.