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Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Air Quality	Air Quality * TSHR-7 - Dust abatement supplements for roads can be very costly. We recommend if required, dust abatement be funded through Forest funds, or the costs for such actions be reimbursed to the contractor or credited against stumpage or other project fees and deposits.	Pitts/Birtcher	Intermountain Forest Association/ Montrose Forest Products, LLC	Unique	Timber sale appraisals will reflect the cost of dust abatement, if it is determined necessary for a particular sale.	1
Climate Change	Climate change stressors may be in-part responsible for the prevalence of mistletoe and beetles. I have to ask-how then, would removing vast shaded areas not further exacerbate the effects of climate change on the surrounding forest, making it even more susceptible to pestilence? This could lead to a more vicious circle than the current situation.	Navy		Unique	With regard to lodgepole pine dwarf mistletoe, our experience has shown that limited clear cut harvests are effective in eliminating infestations and establishing new stands of mistletoe-free of lodgepole pine. A diversification of tree sizes and ages is a valid method to increase landscape resiliency to stressors such as bark beetles, as described in the EA. Climate change considerations are discussed in the Timber section of the EA.	2
Collaboration/ Meetings	As non-resident owners, we have concerns that these gatherings of like-situated neighbors will undoubtedly be at inconvenient times and locations. Without attending these meetings, we are concerned that we will have no voice regarding the proposed work adjacent to our property. Perhaps a Skype-like video feed or an area-representative system could be established so that one representative could voice the concerns of many at the necessary gathering.	Caston		Unique	We appreciate the comment. See the EA Public Involvement section. Most of the public meetings for this project have had virtual options for attending. We anticipate continuing to utilize the virtual option during implementation as long as there is a need and participation.	3
	We have concerns about the timing the Forest Service has used to present this project. The FS is well aware that the residents of Taylor Park are present primarily during the summer months. Many of these residents are not even aware of this project yet and will not be able to submit objections, or support, for this project during the scoping comment period. We feel the FS has been less than transparent and not supportive of this community by putting forth this plan at this time	Murphy		Unique	See the EA Public Involvement section. The release of public documents are widely distributed and local landowners are engaged and informed to the best of the Forest Service's ability.	4
	To make this project effective and efficient, the Forest Service should partner with the private sector to harvest these areas while supporting local jobs and the economy. Please resist efforts by some that feel salvage logging and treatment in high-use recreational areas is not appropriate. Salvage logging is an important management tool, especially in instances of insect epidemics like the GMUG National Forest and surrounding National Forests are experiencing.	Alspach, PE		Master Form	An Adaptive Management Group was developed to assist the FS with the development and implementation of this project. This group is well represented by a diverse group of interests. See EA: Public Involvement.	5

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Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Collaboration/ Meetings (continued)	The County of Gunnison, Colorado ("Gunnison County") expresses its desire and commitment to participate in the Taylor Park Vegetation Management Environmental Assessment ("Taylor Park EA"). As the United States Department of Agriculture ("USDA") may be aware, the Board of County Commissioners of the County of Gunnison, Colorado ("Gunnison County Board") has the authority to protect and promote the public health, safety and welfare of the people of Gunnison County, and the authority to regulate land use planning and environmental quality and protection in Gunnison County, Colorado. Accordingly, the Gunnison County Board is an important and necessary stakeholder with regard to any forest or vegetation treatment that occurs within the public lands of the County. Gunnison County therefore reserves the right to make additional comments and to fully participate in the Taylor Park EA process.	Hoyt	Gunnison County	Unique	We welcome comments and input from the County of Gunnison.	6
	* IFA members vary significantly in the businesses they run and the materials they can economically utilize. We ask that you keep the current operators and utilization businesses in mind while planning this project and recognize that some parts of the project, such as commercial thinning (depending on tree size), precommercial thinning, and fuels treatments may need to be accomplished through contracting options other than timber sales.	Pitts	Intermountain Forest Association	Unique	We recognize that the completion of all of the work identified in the proposed action will include a variety of contracting methods.	7
	Thank you for addressing these concerns and working on improving the forest health! As a neighbor with the forest we hope that we can coordinate efforts that complement each other's plan. Please contact us if you have any questions. Grizzly Peak Ranch	Schmillen		Unique	An Adaptive Management Group was developed to assist the FS with the development and implementation of this project. This group is well represented by a diverse group of interests. See EA: Public Involvement. Opportunities to be involved with this project will exist throughout implantation. See Appendix E: Implementation Process and Public Engagement.	8
Healthy Forest Restoration Act	1. THE FOREST SERVICE MUST EXPLICITLY DEMONSTRATE THAT THIS PROPOSAL QUALIFIES FOR THE HFRA PROCESS. The Forest Service must demonstrate how this project falls within the criteria of the Healthy Forest Restoration Act ("HFRA"). In the scoping letter there is merely a conclusory statement that this project will be developed under the HFRA "because all treatments are in areas designated in accordance with section 602 of the HFRA."1 (1 Scoping Letter at 2. ("SL").)This is insufficient for establishing that the proposed timber cuts and other activities fall within the gambit of the HFRA.	Melton	Center For Biological Diversity	Unique	The project is eligible as an authorized project under the Healthy Forests Restoration Act because it is located in a within the area designated as experiencing or are at risk of experiencing insect and disease infestations on the map proposed by the Governor of Colorado and is being developed collaboratively.	9
Information Request	I would appreciate hearing from the Ranger in-charge as to the schedule and the results of any survey the Forest Service may take regarding this property	Collard		Unique	Appendix A: Implementation Checklist Appendix E: Public Participation and Implementation Guide	10
	On the map we notice that you have fuel treatments surrounding private property - Thanks! We noticed on the East side of the Private property in Illinois Creek there is no treatment. IS there a reason for this?	Schmillen		Unique	Adjacent USFS land east of the Illinois Creek private property is designated Colorado Roadless Area. Roadless areas were not considered for treatments with this project.	11
	Also it looks like there is no management planned in the north of Texas Creek Road. Why are there no treatments in this area?	Schmillen		Unique	See Alternative 2. Some treatments were added in this area. <i>Note: Alternative 2 was developed after the preliminary EA comment period.</i>	12

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Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Information Request (continued)	According to Colorado State Forest Management Plan in 2010 the best treatment for dwarf mistletoe is to prune. Is pruning planned for this treatment?	Schmillen		Unique	Pruning can be effective in removing large brooms of lodgepole pine dwarf mistletoe and can allow trees to recover vigor and substantially prolong their life. It is not likely to affect spread and intensification of the disease in the stand. Pruning can also remove all active mistletoe from a group of trees, but is extremely costly, even over small areas (Worrall 2018). The mistletoe infections present in the project area are too large to effectively manage with pruning alone.	13
Infrastructure	The bridge across Spring Creek to access the National Park's land to our south will not support the weight or width of a log-transport vehicle. The 2-track road from the bridge to the Park runs through the front yards of 5 properties and will not support the wheeled traffic of multi-cycle timber removal processes.	Caston		Unique	National Forest System roads would be improved, as necessary to meet project demands. Engineering road and bridge surveys are conducted to identify if improvements are necessary for log hauling prior to operations.	14
	The same letter from District Ranger McCombs states that some temporary roads may be necessary. Our concern to this proposal goes to all the points mentioned above. Roads in themselves are impactful to soils and animals. What needs to be added to any consideration of new roads is the heavy impact of year round use of ATVs and snowmobiles in the Taylor Valley. In recent years, the number of ATVs have greatly increased during the summer. Any roads built will also be used by these vehicles. We have observed the impact of this increase in our area - Increased human waste and trash in more remote areas of the forest. ATV riders going off trail to avoid mud, or just to venture further off-road. This happens so often, "new roads" have formed from this traffic.	Murphy		Unique	All temporary roads would remain closed to public use during the project and physically closed upon project completion. The requirements for temporary road decommissioning and blockage to public use are described in the EA.	15
	No new roads, permanent or temporary	Atkins		Unique	The project would not result in any new roads open to the public. All temporary roads would remain closed to public use during the project and physically closed upon project completion.	16
	Transportation System and Haul Routes * TSHR-2 - Fully decommissioning temporary roads including re-contouring can be very expensive. If required, we recommend the costs for such actions be reimbursed to the contractor or credited against stumpage or other project fees and deposits.	Pitts/Birtcher	Intermountain Forest Association/ Montrose Forest Products, LLC	Unique	Timber sale appraisals will reflect the cost of temporary road decommissioning.	17
	The Center is also aware, and multiple comments have also pointed out, the high level of motorized use in the Taylor Park area and how new roads for timber sales and other activities from this proposal would likely increase resource damage and conflict. These impacts must be analyzed by the Forest Service. Relatedly, the agency needs to disclose and analyze the impacts that would occur to Forest Service, county, and state roads. What such existing roads would be used to access the areas for proposed activities? How does this impact human safety and wildlife collision risks, including on tight and narrow canyon roads such as, but not limited to, Highway 135, Taylor Canyon (County Road 742), and Spring Creek Road (744)?	Melton	Center For Biological Diversity	Unique	The EA analyzes project effects on the local transportation system. The project would not result in any new roads open to the public. All temporary roads would remain closed to public use during the project and physically closed upon project completion.	18

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Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
NEPA Process	Under the proposed project, 15,165 acres could be treated. Strips up to 300 feet wide or even larger could be created, and might have to be permanent to serve their purpose. (See further discussion below in section V.) This would considerably fragment wildlife habitat for species needing forested habitat, including lynx and marten. It would also affect recreation, watersheds, soils, scenery, and other resources. Overall, such treatment could have significant effects on the human environment. Thus, an EIS must be prepared.	Reed	HCCA	Unique	There is no plan to maintain open strips of up to 300 feet wide. The intention of the strip cuts is to protect the existing young healthy stands (free of dwarf mistletoe) from the infected adjacent stands. These strips would then regenerate young stands of lodgepole pine, which are free from mistletoe and will not infect the original healthy stands. Areas proposed for clearcuts would be restocked with tree seedlings within five years of harvest to meet stocking standards, per the National Forest Management Act if natural regeneration does not occur. Project effects are analyzed in the EA and design features to mitigate impacts are included in Appendix A. Should any significant impacts be identified, an EIS would be prepared.	19
	A complete EIS to thoroughly study this proposal	Atkins		Unique	Project effects are analyzed in the EA and design features to mitigate impacts are included in Appendix A. Should any significant impacts be identified, an EIS would be prepared consistent with the requirements of NEPA.	20
	1. THE FOREST SERVICE MUST PREPARE AN ENVIRONMENTAL IMPACT STATEMENT. The context and intensity of this proposal warrants an Environmental Impact Statement ("EIS") not an Environmental Assessment ("EA").2 (2 Under 16 U.S.C. § 6514(a) the Forest Service shall conduct authorized hazardous fuel reduction projects in compliance with the National Environmental Policy Act of 1969 ("NEPA"). 16 U.S.C. § 6514(a)(1). As there are no changes in the HFRA to NEPA's definition of "significance"—the determining factor for whether a not a project may be analyzed via an EA—NEPA's definition of significance is the controlling factor. See 16 U.S.C. § 6501 et seq. (fails to provide an alternate means for determining whether an EA or EIS is appropriate); 16 U.S.C. § 6514(a) (authorized hazardous fuel projects shall comply with NEPA.) The National Environmental Policy Act ("NEPA") requires agencies to prepare an EIS where a proposed project will "significantly affect[] the quality of the human environment." 42 U.S.C. § 4332(C). "Significantly" requires agencies to consider both "context and intensity" of a major federal action. 50 C.F.R. § 1508.27. "Either of these factors may be sufficient to require preparation of an EIS in appropriate circumstances." Nat'l Parks & Conservation Ass'n v. Babbitt, 241 F.3d 722, 731 (9th Cir. 2001). Context "means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality" and "varies with the setting of the proposed action." 40 C.F.R. § 1508.27(a). Intensity "refers to the severity of the impact" and is evaluated by looking at, among other things: *impacts that may be both beneficial and adverse; * the degree to which the proposed action affects public health or safety; * unique characteristics of the geographic area such as proximity to wetlands or ecologically critical areas; *the degree to which the effects are highly controversial; * the degree an action may establish a precedent for future actions with significant effects;	Melton	Center For Biological Diversity	Unique	Project effects (including cumulative effects associated with SBEADMR and Taylor Park Silviculture CE) are analyzed in the EA and design features to mitigate impacts are included in Appendix A. Should any significant impacts be identified, an EIS would be prepared consistent with the requirements of NEPA. There is no plan to maintain open strips of up to 300 wide. The intention of the strip cuts is to protect the existing young healthy stands (free of dwarf mistletoe) from the infected adjacent stands. These strips would then regenerate young stands of lodgepole pine that are free from mistletoe and will not infect the original healthy stands. Areas proposed for clearcuts would be restocked with tree seedlings within five years of harvest to meet stocking standards, per the National Forest Management Act if natural regeneration does not occur.	20

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
NEPA Process (continued)	<p>* whether the action is related to other actions with individually insignificant but cumulatively significant impacts. 40 C.F.R. § 1508.27(b)(1)-(10). Importantly, significance "exists if it is reasonable to anticipate cumulatively significant impact on the environment" and significance "cannot be avoided by terming an action temporary or by breaking it down into small component parts." 40 C.F.R. § 1508.27(b)(7). Here, context and/or intensity of the proposed action requires an EIS. Under the proposed project, 15,165 acres could be cut or undergo other actions. 3(3 Scoping Letter ("SL") at 3) Strips up to 300 feet wide or even larger could be created,4(4 Proposed Vegetation Treatment Details, at 2. ("PVTD") and might have to be permanent to serve their purpose. (See further discussion in HCCA et al. comments). The proposed actions would considerably fragment wildlife habitat for species needing forested habitat, including lynx and marten. It would also affect watersheds, soils, scenery, wildlife, recreation, and other resources. Overall, such treatment would have significant effects on the human environment. Branching out from the specifics of this proposed project makes it more evident that an EIS is in order. As the scoping letter points out, the Forest Service finalized a massive Grand Mesa, Uncompahgre, Gunnison ("GMUG") National Forest-wide timber project that covers up to 120,000 acres of the forest, providing for 60,000 acres to be commercially cut and another 60,000 acres to undergo non-commercial activities.5(5 SL at 2; https://www.fs.usda.gov/detail/gmug/landmanagement/resourcemanagement/?cid=fseprd497061 (last visited May 19, 2018) (provides information on SBEADMR as well as areas of the forest with SBEADMR activities for 2016-2018).) The 2018 SBEADMR activity map demonstrates (Attachment A) a substantial portion of the area proposed for the Taylor Park Vegetation Management Project is also included to undergo SBEADMR activities in 2020. Thus, this area is already proposed to undergo a high level of activity per SBEADMR, an analysis that did not account for additional impacts that would stem from the activities proposed with the present project. The activities that were considered in SBEADMR are also drastically different from those proposed here, preventing the current proposal from falling under the SBEADMR analysis umbrella. The Center is also aware that there are on-going clearcut activities in the Taylor Park area—these need to be taken into consideration in an EIS for the context and intensity of this project and the cumulative impacts to the Taylor Park area of the Gunnison National Forest. This proposal also overlaps with areas that are wetlands and/or largely unroaded forests, areas proposed for special management that would keep the unroaded and undeveloped characteristics intact, moose concentration areas, and bighorn sheep summer concentration areas and migration patterns. All of these issues and the issues discussed in the HCCA et al. letter indicate that an EIS—not an EA—is the necessary analysis tool for this proposal.</p>					

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
NEPA Process (continued)	<p>FORMULATE AND ANALYZE ADDITIONAL ALTERNATIVES THAT MEET THE PROJECT'S PURPOSE AND NEED WHILE REDUCING THE IMPACTS Under HFRA, the agency is only required to analyze the proposed action and no action alternatives, but others can be proposed by commenters during scoping. Any alternative proposed must meet the project's purpose and need. The undersigned organizations and individuals request that the Forest Service prepare additional alternatives, beyond the contemplated all-or-nothing approach, that would still meet at least part of the project's purpose and need while significantly reducing environmental impacts. One alternative should propose treatments only, or at least primarily, in the highest priority areas, as described below. A second alternative should prioritize treatment areas outside of those identified for conservation by recent and ongoing community endeavors, also described below. (We are happy to see that no treatments would be proposed in wilderness areas, wilderness study areas, Colorado Roadless Areas, and designated recreation management areas.) It would be impossible, and unnecessary, to treat every acre currently affected or possibly affected in the future by dwarf mistletoe, bark beetles, or other natural forest stressors. Therefore, treatments should be located where they will do the most good to protect public safety while maintaining favorable ecological conditions and causing the least adverse impacts to various resources. Accordingly, we request that the Forest Service analyze an alternative that limits timber cutting to the highest priority areas, identified as: 1. the wildland urban interface (WUI); 2. along roads that access private land and/or roads frequently used by the public and the Forest Service for access to the Gunnison National Forest; 3. in and adjacent to campgrounds, picnic grounds, trailheads, and other sites used by the public; 4. along powerlines.</p> <p>Alternatives that would treat less acreage and produce a lower volume would still meet the project's purpose and need, as they would still address the primary purpose to "respond to multiple and interactive stressors affecting the forest including climate change, drought, insect attack and disease while promoting safety through reduction of fuel loading in the Wildland-Urban Interface (WUI) and surrounding areas" and the secondary purpose "to provide wood products for the regional economy."6 Regarding the latter purpose, the Gunnison National Forest has already approved tens of thousands of acres of resiliency treatments through SBEADMR, and the regional economy receives wood products from that project (and others). A scaled-back Taylor Park project could "complement"7 SBEADMR without resulting in 15,000 acres of additional logging, new road construction, and associated impacts.</p>	Reed	HCCA	Unique	<p>The commenter's preference for alternatives limited to the wildland - urban interface and adjacent to existing infrastructure is noted. The purpose and need for this project includes concerns that extend well beyond the wildland - urban interface, (e.g., restoring forest resilience in responding to multiple stressors including climate change, drought, insect attack, and disease). We do not agree that reducing the scale of the project to the WUI, as defined by the commenter, would meet the purpose and need for the project. See EA: Alternatives Considered but Eliminated from Detailed Study.</p> <p>This project proposed treatment of different vegetation types and forest health concerns not considered by SBEADMR.</p> <p><i>Note: After the preliminary EA comment period a second action alternative was developed. Alternative 2 was developed through a collaborative process with the Adaptive Management Group and Science Team. See EA: Project Alternative Development and Alternative 2 sections for more details.</i></p>	21

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Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
NEPA Process (continued)	The undersigned also request that the Forest Service consider an alternative that prioritizes treatments outside of areas identified by past and current community public lands endeavors for wilderness designation, special management area designation, and roadless area conservation. There is a long track record of local support for public lands conservation in and around the project area. In 2005, a local initiative known as Mountains to Mesas (or M2M) submitted comprehensive wilderness recommendations as part of the previous, but ultimately abandoned, GMUG National Forest plan revision process. Developed by citizens and scientists in western Colorado in collaboration with HCCA, Sheep Mountain Alliance, Southern Rockies Ecosystem Project, Western Colorado Congress, and Western Slope Conservation Center, M2M recommended 21,016 acres at Matchless Mountain for wilderness.11	Reed	HCCA	Unique	We excluded Designated Wilderness, Colorado Roadless Areas, the Fossil Ridge Recreation Management Area, and other designated areas. The request to exclude areas not currently under a land management designation is noted. See Alternatives Considered but Eliminated from Detailed Study	22
	An alternative that strikes a compromise between the Forest Service's proposed action on the one hand, and doing nothing on the other hand, would satisfy the expectations of multiple community interests while still meeting the project's stated purpose and need.	Reed	HCCA	Unique	The comment is noted. The no-action and action alternatives demonstrate a range of project effects consistent with the requirements of HFRA. <i>Note: After the preliminary EA comment period a second action alternative was developed. Alternative 2 was developed through a collaborative process with the Adaptive Management Group and Science Team. See EA: Project Alternative Development and Alternative 2 sections for more details.</i>	23
	An EIS should be prepared that analyzes at least one additional alternative to the proposed action. The EIS should analyze and disclose potential cumulative impacts from the proposed project along with past projects, SBEADMR, and other reasonably foreseeable future projects. The undersigned reserve the right to supplement these scoping comments with additional information throughout the agency's administrative process.	Reed	HCCA	Unique	An EIS will only be prepared if analysis conducted for the EA determines that significant effects to the human environment may result from the proposed action. Cumulative effects are analyzed and will be included in the EA. The Taylor Park Adaptive Management Group was developed to collaborative work with the FS throughout the planning and implementation of this project. This group and the Science Team helped with developing Alternative 2. See EA: Project Alternative Development.	24
	1. THE AGENCY MUST FORMULATE AND ANALYZE ADDITIONAL ALTERNATIVES THAT MEET THE PROJECT'S PURPOSE AND NEED WHILE REDUCING THE IMPACTS. Although the HFRA arguably only requires the Forest Service analyze the proposed action and no action alternatives, other alternatives can be proposed commenters during scoping and then analyzed by the agency. 6(6 16 U. S. C. 6516(c)(1)(C).) Where, as here, the proposal is also highly controversial and significance warrants an EIS, the Forest Service needs to prepare additional alternatives that would significantly reduce environmental impacts and result in a less controversial proposal. As discussed in the HCCA et al. letter, this can be done while also still meeting the Forest Service's stated purpose and need. Accordingly, the Center calls on the Forest Service to include two additional alternatives in its analysis: one that proposes treatments only, or at least primarily, in the highest priority areas, as described in HCCA et al.; and, one that prioritizes treatment areas outside of those identified for conservation by recent and ongoing community endeavors.	Melton	Center For Biological Diversity	Unique	See Alternatives Considered but Eliminated from Detailed Study for discussion on the proposed alternatives. After the preliminary EA comment period a second action alternative was developed. Alternative 2 was developed through a collaborative process with the Adaptive Management Group and Science Team. See EA: Project Alternative Development and Alternative 2 sections for more details. Regarding the need to prepare an EIS due to controversy, the courts have held that the meaning of controversy here is not public disagreement, but rather controversy regarding scientific uncertainty about project impacts. The treatments proposed in this project are well understood actions. An EIS will be prepared if analysis conducted for the EA determines that significant effects to the human environment may result from the proposed action.	25
	An EIS must be prepared that analyzes additional alternatives to the proposed action as well as fully analyses and discloses direct, indirect, and cumulative impacts from the proposed project along with all past projects, SBEADMR, and other reasonably foreseeable future projects.	Melton	Center For Biological Diversity	Unique	The EA includes direct, indirect, and cumulative impacts from the proposed action and related past, present, and reasonably foreseeable actions. An EIS will be prepared if analysis conducted for the EA determines that significant effects to the human environment may result from the proposed action.	26

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Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
NEPA Process (continued)	<p>There have been many vegetation management/timber sale projects in and near the project area over the past decades. According to the Scoping Letter, 6,363 acres of lodgepole pine has been previously treated.¹⁹ There has likely been some treatment on Engelmann spruce stands also. Under the recently approved SBEADMR Project, 40,691 acres of spruce-fir and aspen in the Gunnison North Geographic Area could be treated.²⁰ Some of this is in the Taylor Park project area. Compare the SBEADMR preferred alternative map²¹ with Taylor Park Scoping/Comment Map. All of the past cutting, the acres approved under SBEADMR, and any other reasonably foreseeable future project must be considered along with the Taylor Park Project in determining the potential cumulative impacts to recreation, watershed, soils, scenery, etc., and most importantly, to wildlife habitat fragmentation and connectivity.</p>	Reed	HCCA	Unique	<p>The EA includes direct, indirect, and cumulative impacts from the proposed action and related past, present, and reasonably foreseeable actions. Cumulative Effects Maps for Alternatives 1 & 2 are in the Environmental Impacts: Timber section—these maps include SBEADMR treatments.</p>	27
	<p>Consider the cumulative effects of all activities including previous logging, growing recreational use, the spike in traffic from a soon to be paved Cottonwood pass etc. This proposal is not an isolated happening and Taylor Park needs to be looked at as a whole.</p>	Atkins		Unique	<p>The EA includes direct, indirect, and cumulative impacts from the proposed action and related past, present, and reasonably foreseeable actions.</p>	28
	<p>1. THE FOREST SERVICE MUST ANALYZE DIRECT, INDIRECT, AND CUMULATIVE IMPACTS. NEPA requires that the Forest Service fully review all direct, indirect, and cumulative environmental impacts of the proposed project.⁷(7 40 C.F.R. § 1502.16, 1508.8, 1508.25(c).) Direct effects are caused by the action and occur at the same time and place as the proposed project.⁸(8 40 C.F.R. § 1508.8(a).) Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable.⁹(9 40 C.F.R. § 1508.8(b).) Types of impacts include "effects on natural resources and on the components, structures, and functioning of affected ecosystems," as well as "aesthetic, historic, cultural, economic, social or health [effects]." Id. Cumulative effects are defined as: [T]he impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 10 (10 40 C.F.R. § 1508.7.) The Forest Service's analysis must fully disclose all direct and indirect impacts that would stem from the proposed project. It is not enough to provide what the different proposed activities would entail, the agency must analyze what these activities mean as far as direct and indirect impacts to the various resource values at play (wildlife habitat and connectivity, water quality, soils, scenery, etc.). The analysis should provide detailed maps showing the overlay of the proposed activities and wildlife habitat. This information is critical for the public and ultimate decisionmaker to fully understand the impacts from the proposed activities. The Center is also particularly concerned about direct and indirect impacts on Texas Creek, which Colorado Parks and Wildlife fishing map shows contains native cutthroat trout. 11(11 Available at https://ndismaps.nrel.colostate.edu/index.html?app=FishingAtlas.)</p>	Melton	Center For Biological Diversity	Unique	<p>The EA includes direct, indirect, and cumulative impacts from the proposed action and related past, present, and reasonably foreseeable actions. GIS analysis of proposed activities and wildlife habitat were performed to determine effects. These effects are disclosed in the EA and BA. Detailed maps were determined to not be necessary for understanding the effects. There are no conservation populations of cutthroat trout in the planning area. See Appendix C: Table C-1. The goal for cutthroat trout conservation is to assure the long-term viability of Colorado River cutthroat trout throughout their historic native range. A conservation population is any cutthroat trout population with greater than or equal to 90% genetic integrity of their native historic range. The Colorado Fish Atlas does list "Cutthroat Trout (native)" as being present in Texas Creek. These fish do have native genetics, however due to historic stocking and wild reproduction they do NOT qualify as a Conservation Population of native Colorado River cutthroat trout. They are of recreational importance and therefore considered in the NEPA analysis under Management Indicator Species (MIS) or common trout.</p>	29

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Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number	
NEPA Process (continued)	There have been many vegetation management/timber sale projects in and near the project area over the past decades. According to the Scoping Letter, 6,363 acres of lodgepole pine has been previously treated. 12(12 SL at 1.) There has likely been some treatment on Engelmann spruce stands also.	Melton	Center For Biological Diversity	Unique	The EA includes direct, indirect, and cumulative impacts from the proposed action and related past, present, and reasonably foreseeable actions. Cumulative Effects Maps for Alternatives 1 & 2 are in the Environmental Impacts: Timber section—these maps include SBEADMR treatments.	30	
	Under the recently approved SBEADMR Project, 40,691 acres of spruce-fir and aspen in the Gunnison North Geographic Area could be treated. 13(13 SBEADMR ROD at 5) Some of this is in the Taylor Park project area. Compare SBEADMR preferred alternative map at FEIS G-3 with Taylor Park Scoping/Comment Map. The cumulative impacts of all past cutting, the acres approved under SBEADMR, and any other reasonably foreseeable future project must be considered along with the impacts from this proposed action to fully understand and disclose the true cumulative impacts to the watershed, wildlife habitat and connectivity, soils, recreation, scenery, and other resource values.	Melton	Center For Biological Diversity	Unique	The EA includes direct, indirect, and cumulative impacts from the proposed action and related past, present, and reasonably foreseeable actions. Cumulative Effects Maps for Alternatives 1 & 2 are in the Environmental Impacts: Timber section—these maps include SBEADMR treatments. Design features to mitigate impacts are included in Appendix A.	31	
Oppose	This proposal is overreaching and should be scaled back.	Dunkle		Unique	Opinion noted.	32	
	I am writing in opposition to the proposed logging operation in Taylor Park. The scope of this project is massive and completely out of scale for the area.	Atkins		Unique	The commenter's opposition of the proposed action is noted. We judge the scale of the proposed action as appropriate to address the current purpose and need.	33	
	I ask you to please choose a No Action option for Taylor Park.	Atkins		Unique	Commenter's preference for no action noted.	34	
Other	As president of the Murdie Neighborhood Association, I want to take this opportunity to strongly voice my support for the comments and proposals set forth by High Country Conservation Advocates in their letter of 21 May 2018.	Gallart		Unique	Comment noted.	35	
	As a resident of Murdie Subdivision, having been advised of the concerns expressed by the High Country Conservation Advocates, I want to go on the record as supporting their suggestions.	Staples		Unique	Comment noted.	36	
	Replanting has not occurred in many old clear cut areas. Where they have been done, only lodgepole pines were replanted which does not create a diversified forest. They were also planted too close together, so only creating a new unhealthy forest.	Murphy		Unique	The project includes pre-and post- implementation monitoring to assure that treatments achieve desired conditions. Areas proposed for clearcuts would be restocked with tree seedlings within five years of harvest to meet stocking standards, per the National Forest Management Act. The desired density and species composition of new seedlings is determined by a Forest Service Certified Silviculturist. Species and age class diversity and resilience are assessed from a landscape scale and not just considered and individual stand levels.	37	
	MINIMIZE WINDTHROW Removing trees may reduce the wind firmness of the stands where cutting takes place, leading to trees blowing down after cutting. Any spruce blowdown would be especially undesirable because spruce bark beetles breed heavily in such material. All cutting units must be carefully designed to minimize windthrow.	Reed	HCCA		Unique	The comment is noted. Project implementation plans will specifically attempt to avoid creating greater risk of windthrow. Foresters and timber crews are trained in unit layout techniques that minimize the potential for windthrow.	38
	Currently, Montrose Forest Products does not have a market for POL (products other than logs) and/or biomass. Therefore, some parts of the project, such as commercial thinning (depending on tree size), precommercial thinning, and fuels treatments may need to be done through contracting options other than timber sales.	Birtcher	Montrose Forest Products, LLC		Unique	We recognize that some aspects of the proposed action would be completed with methods other than a standard timber sale contract.	39

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Prescribed Fire	I am concerned about controlled burns as they seem to be able to become uncontrolled with unfortunate consequences	Pearson		Unique	The comment is noted. Burn plans will include measures such as wind speed limits and moisture requirements to minimize potential for fire escape.	40
Project Design	Building upon the success of the adaptive management process currently being utilized in the Spruce Beetle Epidemic and Aspen Decline Management Response (SBEADMR) Project, I believe the Forest Service should utilize the best available science and make changes to the project implementation as necessary.	Alspach, PE		Master Form	Appendix E: Public Engagement and Implementation Guide EA: Table 1. Decision-making triggers for adaptive management.	41
	The Forest Service needs to reduce the size of this excessive proposal. The science is clear that public safety, maintaining favorable ecological conditions, and minimizing adverse impacts to resources are best achieved when timber cutting is limited to the highest priority areas, which are: the wildland urban interface (WUI), which should extend no more than 200 feet from infrastructure; along roads that access private land and/or roads frequently used by the public and the Forest Service for access to the Gunnison National Forest; in and adjacent to campgrounds, picnic grounds, trailheads, and other sites used by the public; and, along powerlines. The proposed project is much more than what is needed to treat mistletoe or ensure public safety, and would possibly have significant impacts to wildlife and recreation. I request that the Forest Service do a much smaller project - one that concentrates timber cuts and other activities in the wildland-urban interface.	Harte		Unique	Actions beyond the suggested areas are needed to address the Purpose and Need for the project. EA: Alternatives Considered but Eliminated from Detailed Study Effect to wildlife are analyzed in the EA and design features are included to minimize impacts to both wildlife and recreation.	42
	My request is that the proposed work is reduced and only focused on corridors close to "urban" interface and around powerlines, etc.	Zillioux		Unique	The purpose and need for this project extend beyond the wildland/urban interface. See EA: Alternatives Considered but Eliminated from Detailed Study.	43
	The scale of this proposal is way too big. The effects to recreation and wildlife would be huge and drastically overshoot the needs. Increased traffic of trucks etc. would take these effects from the actual area and impact the entire region.	Wight		Unique	The level of treatments proposed over a 10-year period is consistent with other timber sales that have historically occurred on the Gunnison Ranger District and GMUG. Project effects on the resources listed are analyzed in the environmental assessment and/or mitigated by design features in Appendix A. Traffic effects specifically are disclosed in the EA and Biological Assessment.	44
	Keep these efforts local to where there is already traffic and leave the rest alone. See how it works on a smaller scale and then reassess without making a monstrous mistake without understanding the consequences.	Wight		Unique	The commenter's preference for a smaller scale project is noted. We judge the scale of the proposed action as appropriate to address the current purpose and need. Additionally, this project is structured to use an adaptive management process throughout the life of the project. See Appendix E: Public Engagement and Implementation Guide. Following the Comment Period, Alternative 2 was developed with an emphasis of reducing the mileage of temporary road construction.	45
	Overall, the approximate 15,000-acre treatment area seems excessively large, considering the remoteness of much of it. My first request would be to treat a smaller area, and assess the success of the treatments before expanding them in the future	Navy		Unique	The commenter's preference for a smaller scale project is noted. We judge the scale of the proposed action as appropriate to address the current purpose and need. Additionally, this project is structured to use an adaptive management process throughout the life of the project. See Appendix E: Public Engagement and Implementation Guide.	46

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Project Design (continued)	The proposed project is more than is needed to treat mistletoe, and would have possibly significant impacts to wildlife, recreation, and other resources. Therefore, we strongly recommend a much smaller project, one that would concentrate treatment in the wildland-urban interface	Reed	HCCA	Unique	The commenter's preference for a smaller scale project is noted. The purpose and need for this project extend beyond the wildland - urban interface. Effects are analyzed in the environmental assessment and design features to mitigate impacts are included in Appendix A. Treating these areas for dwarf mistletoe will have other benefits that are noted in the EA, such as age-class diversification and breaking-up of continuous fuels. See EA: Alternatives Considered but Eliminated from Detailed Study.	47
	The proposed project is not only larger than needed to "treat" mistletoe but would also have significant impacts to wildlife, recreation, and other resources. The Forest Service needs to consider a smaller project that concentrates on the wildland-urban interface as defined in the HCCA et al. letter (200 feet from infrastructure).	Melton	Center For Biological Diversity	Unique	The commenter's preference for a smaller scale project is noted. The purpose and need for this project extend beyond the wildland - urban interface. See EA: Alternatives Considered but Eliminated from Detailed Study. Treating these areas for dwarf mistletoe will have other benefits that are noted in the EA, such as age-class diversification and breaking-up of continuous fuels.	48
	While I understand that dwarf mistletoe is a concern for our forests, this proposed project is much more than what is necessary for the control of mistletoe. As a result, the project will fragment important wildlife habitat, negatively affect watersheds, soils, scenery, and recreation opportunities. This project should be much smaller, focusing on timber cuts in the wildland-urban interface.	Peterson		Unique	The commenter's preference for a smaller scale project is noted. The purpose and need for this project extend beyond the wildland - urban interface. See EA: Alternatives Considered but Eliminated from Detailed Study. Treating these areas for dwarf mistletoe will have other benefits that are noted in the EA, such as age-class diversification and breaking-up of continuous fuels.	49
	I examined the map enclosed by having the image enlarged and carefully compared to the latest Forest Service map and to the current travel map. All of the actions proposed miss the area I am most concerned about by a fair distance.	Pearson		Unique	Commenter did not specify their particular area of interest. It is unclear if the commenter wanted the interested area to be subjected to treatment or excluded from treatment.	50
	The Forest Service needs to clearly define and substantiate its definition of WUI. While there are various definitions, some of these tend to be overly liberal, allowing for excessive wildlands fuels management. The undersigned suggest that a much more limited WUI be used for this project, preferably a 200-foot treatment buffer surrounding structures. 8 We ask that the project clarify its WUI definition to allow for more effective, and less intrusive, forest management. Areas that are much beyond 200-feet from a community or other infrastructure are not part of a WUI, and treatment to protect the infrastructure is not needed there. The Forest Service should fully consider an alternative that includes a reasonable WUI area plus a safety margin for firefighters. Forest Service research clearly shows that the best way to protect structures from wildfire is to treat the structure itself and the area immediately surrounding it. 9 The most important areas to treat are those where mortality caused by mistletoe infestation and bark beetles poses a risk to public health and safety. A component of the stated purpose and need is "promoting safety through reduction of fuel loading in the [WUI] and surrounding areas."10 As discussed above, treatment in the WUI is an important part of meeting that purpose. But another aspect of safety stems from dead, dying, or infected trees adjacent to human infrastructure. It thus would be appropriate to remove some dead and dying trees along roads that access private land and/or are used by the public and the Forest Service for access to the Gunnison National Forest.	Reed	HCCA	Unique	We work with local county governments to define Wildland-Urban interface areas in the context of adopted wildfire protection plans. WUI is defined in the Fire and Fuels Management section of the EA. The commenter's reference to WUI being the 200-foot radius from a structure is more accurately considered 'defensible space'. This area is very important for the specific protection of a structure from ignition; however, there are more concerns than simply structure protection that go into consideration of the WUI (e.g., human life, both firefighter and civilians, and effective fire suppression operations near assets). Additionally, treating a larger area provides more opportunity to allow natural ignition to burn with minimal influence from fire suppression efforts. Alternative 2 was added after the comment period and includes the treatment for hazard tree removal within 200 feet for system roads.	51

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Project Design (continued)	<p>Proposed treatments on the northern and northeastern aspects of Matchless Mountain are of particular concern to the undersigned. Matchless is a rugged and steep landscape offering opportunities for solitude within a part of the Gunnison National Forest seeing increased recreation pressure. Rising dramatically above Taylor Canyon, views from the area include Taylor Park, the Collegiate Range, and the Three Apostles. While rising above the popular recreation areas of Taylor Reservoir and the Taylor River, Matchless retains a high degree of naturalness. The rocky walls of Taylor Canyon turn to conifer-covered slopes rising to alpine habitat. These mid- to higher-elevation forests provide good habitat for lynx, elk, goshawk and pine marten. Much of the area is very steep and rugged. To reiterate, the lands encompassed in the proposed project area are loved by many locals and visitors alike, and are home to a wide variety of non-consumptive uses. They also provide outstanding wildlife habitat and wildlife refuges in an area witnessing increased recreational pressure from a variety of users. Diverse forms of recreation are popular in project area, including hiking, snowshoeing, hunting, fishing, mountain biking, and motorized use. Widespread logging that results in significant clearcuts has the potential to negatively impact multiple recreation experiences. Fifteen thousand acres of timber treatment, new road construction, and industrial equipment on the landscape could significantly and adversely impact established uses, wildlife habitat integrity and connectivity, and the lives of property owners in the vicinity.</p>	Reed	HCCA	Unique	<p>The proposed action excludes the following from treatment: Designated Federal Wilderness, 2012 Colorado Roadless Areas, and the Fossil Ridge Recreation Management Area, as well as 48,000 acres excluded due to lack of forest cover or steep slopes.</p> <p>Recreation design features are included in Appendix A to minimize impacts to recreation activities. We do anticipate some displacement to individual during project implantation, but treatments would not occur simultaneously and there are ample recreation opportunities throughout the area.</p> <p>Impact to scenery resources and discussed in the EA (Scenery section). The Taylor Park EA Adaptive Management Group was developed to assist the Forest Service with the development and implementation of this project. This group is well represented by a diverse group of interests, including property owners. See EA: Public Involvement.</p>	52
	<p>RETAIN LARGE TREES The Scoping Letter states that the project "is eligible as an authorized project under [the Healthy Forest Restoration Act] because all treatments are in areas designated in accordance with section 602 of HFRA".²² Projects authorized under HFRA must meet certain requirements, including large tree retention. Specifically, treatment in projects proposed under this act: A. focuses largely on small diameter trees, thinning, strategic fuel breaks, and prescribed fire to modify fire behavior, as measured by the projected reduction of uncharacteristically severe wildfire effects for the forest type (such as adverse soil impacts, tree mortality or other impacts); and 1. maximizes the retention of large trees, as appropriate for the forest type, to the extent that the trees promote fire-resilient stands.²³ As is discussed below in section VI, many trees in the project area are likely to have small diameter. Any larger diameter trees are thus very important, and need to be identified and retained.</p>	Reed	HCCA	Unique	<p>We believe both action alternatives are compliant with HFRA. The proposed prescription are appropriate for the ecology of the species, to address forest health concerns, and promote resiliency.</p> <p>Retaining large trees in mistletoe-infested stands would not achieve the purpose and need, as spores disperses downward from large trees onto lower foliage of adjacent trees. In addition, these large trees often have large witches' brooms that can extend to the ground and increase ladder fuels and canopy density. In group selection in spruce (741 acres maximum in Alternative 1), young stand precommercial thin, sanitation or no treatment (6,182 acres), and fuel treatment – thinning, removal of intermediate trees, removal of slash (2,820 acres) large trees would be retained to the extent possible. These treatments constitute more than 60 percent of the total treatment area.</p>	53

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Project Design (continued)	<p>The Taylor Park area is one of the most heavily utilized and impacted areas on the Gunnison Ranger District in terms of recreational use. Removal of dead and dying trees from developed and dispersed campgrounds, picnic grounds, trailheads, and other sites used by the public should thus be top priority, taking precedence over remote areas far away from human use. Treatments should not be more than is necessary to protect the respective infrastructure. For example, hazard tree removal along roads should occur no more in distance from the road than the height of the tallest tree in the stand plus about 10 percent. Ensuring that infected trees will not hit power lines should also be among the top priority treatments in the Taylor Park area.</p>	Reed	HCCA	Unique	<p>We agree that removal of hazard trees from roadsides, recreation sites, and other developed area is important. The purpose and need for this project, however, includes concerns that extend well beyond the wildland-urban interface, including restoring forest resilience in responding to multiple stressors including climate change, drought, insect attack, and disease. Actions beyond the urban - wildland interface are necessary to address these stressors. Hazard tree removal within 200 feet of system roads was added to Alternative 2. Two hundred feet was determined to be appropriate to account for topography features that could result in hazard tree falling into the road. Appropriate distances will be determined during implementation within the 200-foot allowance.</p>	54
	<p>Some of the project units are very small in size and may be difficult to implement cost effectively. Mobilization of equipment to different units can be very expensive.</p>	Pitts/ Birtcher	Intermountain Forest Association/ Montrose Forest Products, LLC	Unique	<p>Timber sale appraisals and design will reflect the cost of mobilization. Alternative 2 was developed to help with economic feasibility for potential treatments that could be implemented through a commercial sale. Other treatments will not be eligible for commercial harvest and would need to be completed through use of a service contract or completed by FS timber/fire crews.</p>	55
	<p>I trust that this process will be similar to what the Forest Service did on our property in Illinois Creek several years ago. At that time, the Forest Service surveyed the property identifying trees for removal, then arranged for a timber sale contract and monitored the removal process. The process was simple, straightforward and the owners were generally satisfied. The only disappointment and suggestion for improvement would be the removal of the leftover trash/burn piles. This matter should be addressed.</p>	Collard		Unique	<p>The comment is noted. See Appendix A (Implementation Checklist and Design Features) and Appendix B (Silviculture Matrix and Details) for information of treatments.</p>	56

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Project Design (continued)	<p>1. THE PROPOSED ACTIVITIES ARE NOT BASED ON BEST AVAILBLE SCIENCE AND INSTEAD RELIES ON PRECONCEPTIONS THAT LACK EMPERICAL SUPPORT. It is critical that the Forest Service bases its decisions on unbiased, science-based analysis of management practices that best promote forest carbon capture and long-term storage, increase resilience (such as preparing forests for climate change), and protect ecological values and functions. As the proposal currently stands, this is not the case and leads us to conclude that the proposed activities would result in a less versus more resilient Taylor Park forest. Studies investigating how previous fire affects subsequent bark beetle outbreaks have found that high-severity fire reduces forest susceptibility to future outbreaks (e.g., Veblen et al. 1994, Kulakowski et al. 2012, Black et al. 2013, Seidl et al. 2016).14(14 Veblen, T.T. et al. 1994. Disturbance regime and disturbance interactions in a Rocky Mountain subalpine forest. Journal of Ecology 82: 125-35; Kulakowski, D. et al. 2012. Stand-replacing fires reduce susceptibility of lodgepole pine to mountain pine beetle outbreaks in Colorado. Journal of Biogeography 39: 2052-60; Black, S.H. et al. 2013. Do bark beetle outbreaks increase wildfire risks in the Central U.S. Rocky Mountains: Implications from Recent Research. Natural Areas Journal 33: 59-65; Seidl, R. et al. 2016. Spatial variability in tree regeneration after wildfire delays and dampens future bark beetle outbreaks. PNAS 113: 13075-13080.) For example, Seidl et al. (2016) concluded that spatial variability in tree regeneration following large high-severity wildfire in Yellowstone National Park dampened and delayed future bark beetle outbreaks. The authors recommended that managers "embrace rather than reduce disturbance-created variability to strengthen negative feedbacks between successive disturbances." The study suggests that thinning/logging is likely to homogenize forests and exacerbate outbreaks: "post disturbance salvage logging, removal of legacy trees or undisturbed forest patches, and extensive tree planting generally reduce disturbance-induced variability and thus likely weaken negative feedbacks between disturbance events."</p>	Melton	Center For Biological Diversity	Unique	Allowing conditions that foster high intensity wildfire, despite the evidence of such fire having a positive effect on insect infestations, is not viable in the project treatment area due to the presence of private residences and other infrastructure.	57

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Project Design (continued)	<p>Hart et al. (2015b) conducted the first broad-scale analysis of how prior bark beetle outbreaks affect susceptibility to future outbreaks. 15(15 Hart et al., Negative Feedbacks on Bark Beetle Outbreaks: Widespread and Severe Spruce Beetle Infestation Restricts Subsequent Infestation (May 2015) available at http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0127975.) The study found that a widespread, severe spruce beetle outbreak reduced forest susceptibility to spruce beetle infestation 60 years later. Importantly, the study concludes that "failure to incorporate negative feedbacks into prediction of future bark beetle outbreaks is likely to over-predict the extent or severity of future outbreaks and by implication under-estimate forest resistance to altered disturbance regimes under climate change." Additionally, recent reviews by Black et al. (2013) and Six et al. (2014) found that thinning treatments have mixed results and can fail to protect stands.16(16 Black, S.H. et al. 2013; Six, D.L. et al. 2014. Management for mountain pine beetle outbreak suppression: does relevant science support current policy? Forests 5: 103-133.) For example, Black et al. (2013) concluded that "[i]nsect containment measures have yielded mixed results and may pose significant risks to forested ecosystems." Six et al. (2014) noted that "many studies assessing the efficacy of thinning have been conducted under non-outbreak conditions" and therefore their results do not reflect how stands perform during an outbreak. Furthermore, "failures are often not reported" and "studies conducted during outbreaks indicate that thinning can fail to protect stands." Importantly, Six et al. (2014) cautioned that the pressure to thin forests as beetle treatments, often as a means to provide revenue to the commercial timber industry, without scientific understanding of treatment effects can lead to "more harm than good": That pressure, to "do something", might also interact with the uncertainty about which choices are effective and appropriate (as with beetle timber harvest treatments) to create an opportunity for political pressures to force the adoption of particular choices that benefit specific interest groups. It is perhaps no accident that the beetle treatments that have been most aggressively pushed for in the political landscape allow for logging activities that might provide revenue and jobs for the commercial timber industry. The result is that the push to "do something," uncertainty, and political pressures might lead us to act to respond to climate change before we understand the consequences of what we are doing, in the end producing more harm than good.17 (17 Six, D.L. et al. 2014.) In sum, the evidence discussed above demonstrates that while thinning/logging treatments homogenize forests and may reduce resiliency, natural disturbance regimes such as wildfire and beetle outbreaks have been shown to be effective in supporting forest heterogeneity and dampening subsequent beetle outbreaks.</p>					

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Project Design (continued)	While we appreciate the collaborative effort of the project and the concept of using design criteria to address concerns, we ask that the forthcoming analysis explicitly discuss the economic costs for implementing the various design criteria. It is possible to have design criteria that are so stringent that the project becomes economically infeasible.	Pitts/ Birtcher	Intermountain Forest Association/ Montrose Forest Products, LLC	Unique	Explicit cost analysis is beyond the scope of the environmental assessment. We will work with timber purchasers to assure viable sales.	58
	1. IS TIMBER HEAVILY INFESTED WITH DWARF MISTLETOE MERCHANTABLE OR DESIRABLE TO INDUSTRY? Pages 1-2 of the Scoping Letter state that "[t]he best tool for removing the [dwarf mistletoe-] infected trees is through commercial timber harvest." But how merchantable are these trees? Our perception is that they are rather small in diameter. This is consistent with stands that have long been infected with mistletoe and/or are severely infected, as mistletoe is known to reduce tree growth,45 with effects increasing as the infection becomes more severe.46 In any case, the small size of the trees reduces their possible utilization for wood products such as those manufactured at the Montrose Mill, the industry outlet most likely to bid on any large timber sales offered from the Taylor Park area.47 Trees heavily infested with dwarf mistletoe in the tree bole, as opposed to only in the braches, may be even less desirable for industry. As Geils and Hawksworth, 2002 stated: Wood quality of mistletoe-infected trees is affected by production of larger knots, development of abnormal grain, reduced strength, and other altered physical and chemical properties.48 Mistletoe infections also provide entry points for decay fungi.49 The GMUG NF is already offering much timber for sale, and will continue to do so, under SBEADMR and other projects. It is unclear how the quality of timber to be offered from these other sources compares with that in the Taylor Park Project area, but intuitively, trees from the latter area are less likely to be desired in terms of size and quality than live trees in other areas. It does not seem likely that all of the timber the GMUG could offer from the Taylor Park area - if the project is approved as currently proposed - could be purchased and harvested by industry.	Reed	HCCA	Unique	Local purchasers expressed interest in bidding on timber sales resulting from the proposed action.	59
	Dwarf mistletoe is a native parasitic plant that may have value to the ecology of our forest. We have observed pine martins, birds and other wildlife benefiting from the mistletoe. Also, the lodgepole forest is a sea of mistletoe. Please focus this plan on other forest health and fire management.	Schmillen		Unique	The proposed action is not an effort to extirpate lodgepole pine dwarf mistletoe from the GMUG National Forests, or even the treatment areas, but to reduce overall prevalence of the species by establishing and protecting mistletoe free stands. "There is little or no evidence that the success or abundance of animals is affected by the presence of witches' brooms, and no indication that any mammal or bird in the United States depends on dwarf mistletoe." Worrall 2018. Regardless, even with the proposed treatments, due to the level of infestation in the project area (more than 52 percent of trees infested), there would still be large amounts of infested trees and stands available for wildlife benefit.	60

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Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Recreation and Scenic Resources	Recreation * REC-2 - We understand the importance of special use permits and concessionaire programs. We ask that all restrictions (wildlife, roads, etc.) be considered before giving priority to concessioners and their summer operating season. For example, if other restrictions prohibit operations during other times, the summer operating season may be the only feasible time for harvesting operations.	Pitts/ Birtcher	Intermountain Forest Association/ Montrose Forest Products, LLC	Unique	We will work with special use holders and potential harvest operators to accommodate schedules to the extent possible.	61
	Scenic Quality and Visual Resources * SVR-3 - Total removal of slash and/or chipping can be very expensive. We ask that you keep this in mind when developing projects and during the appraisal process.	Pitts/ Birtcher	Intermountain Forest Association/ Montrose Forest Products, LLC	Unique	Timber sale appraisals will reflect the cost of slash disposal. We recognize that some aspects of slash disposal within highly scenic areas is more expensive.	62
Silviculture	Silviculture * SV-5 requires yarding of un-merchantable material and/or removing bark off of non- merchantable material. Both of these can be very expensive and may not be feasible during a normal timber sale. We ask that you look at other contracting options to get this work accomplished.	Pitts	Intermountain Forest Association	Unique	We recognize that the completion of all of the work identified in the project will include a variety of contracting methods.	63
Slash	Fuels/Slash Piles * SP-3 - We understand the importance of removing enough harvest/activity fuels in Management Areas 1A, 1B, and 1D, but depending on the site, this may not be economically feasible. For example, in areas of spruce mortality, significant breakage can occur at the landing and it may be impractical to remove this material.	Pitts/ Birtcher	Intermountain Forest Association/ Montrose Forest Products, LLC	Unique	This design feature was carried over from SBEADMR.No treatment will occur in Management areas 1A, 1B, or 1D. As such, the design feature has been removed.	64
	We support the removal of infested or felled trees in the effort to reduce fire fuel. Further, we support the reduction of the 'fire-ladder' effect that the lower-arbor trees provide to the mature tree upper arbor. We would wish that the gathering of these felled trees would be sufficiently far away from all private property cabin that residents would neither fall prey to an escaped controlled-burn nor reside next to its undesirable after-affects.	Caston			Unique	Provisions of Fuel Treatment action include removal of residual fuels, including slash, from developed areas within the wildland - urban interface. Treatments are proposed near private property in order to be affectively increase defensible space around these structures. See Appendix B—Fuels Treatment details.

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Slash (continued)	<p>1. SLASH DISPOSAL. There is no discussion of slash disposal in the PVDT, except for fuel treatments. For this type of treatment, "[r]esidual slash will be hand or machine piled and burned to reduce the intensity of a ground fire."⁵³ While some method(s) of slash treatment will need to be done, especially in areas near private land where fuel treatments are proposed, burning piles itself creates a high intensity ground fire. This would be particularly true for machine piles, which could be 10-15 feet high. Even if comprised of small material (say less than three inches in diameter), the result would be long-lasting fires that would sterilize soils and volatilize soil nutrients. Burning piles as proposed might not comply with DF FSSP-10: Conduct prescribed fires (broadcast and piles) to minimize the residence time on the soil while meeting the burn objectives . . . Landowners, their guests, and recreational users would not like the smoke produced by these fires, if burning occurred when they were present. We recommend that the Forest Service consider other slash disposal methods for lands in the wildland- urban interface. Some slash should be retained to protect and renew soils. If slash is piled, it should be limited to hand piles composed of material three inches or less in diameter and no more than about four feet high. Burning should not occur in areas with weeds, like cheatgrass (<i>Bromus tectorum</i>), that proliferate and dominate after fires. DF IW-1 should be mandatory. If slash is chipped, depth should be limited to about two inches and cover not more than about 15 percent of a unit. Chips would prevent vegetation from sprouting, and could consume a considerable amount of soil nitrogen during decomposition.</p>	Reed	HCCA	Unique	<p>We acknowledge that burning of slash piles may result in minor and localized soils effects from burn piles burning at moderate and high intensity burns. These effects, however, would be within allowable limits set by the Forest Plan and are deemed necessary to effectively remove fuels from the site. Some landowner discomfort from prescribed burning is likely inevitable. We will minimize effects through use of a burn plan and by obtaining the required smoke permits prior to burning. The project includes a variety of slash management alternatives including chipping, lopping and scattering, and pile burning. Design features will be applied to identify the most appropriate slash management and reduce overall impacts. Design features are included to minimize impacts to soils and Table 1 of the EA contains decision-making triggers for soil disturbance.</p>	66
Soils	<p>1. PROTECT SOILS The use of heavy equipment for commercial timber harvest is likely to damage soils, by compacting or displacing them, especially at landings and on skid trails and temporary roads. Areas so affected should be repaired, but care must be taken not to damage tree roots that protrude from, or are near, the soil surface. Areas with detrimental compaction, displacement, severe burning, or erosion must not be treated until the areas are recovered or mitigation measures have been successfully applied.⁵² In areas with insufficient down dead logs to meet the Forest Plan standards (see Plan at III-10), some material cut for the project should be retained to reduce soil erosion, slowly decay into new soil, and provide wildlife habitat. Existing down dead material should not be burned or removed. It should be allowed to decay in place.</p>	Reed	HCCA	Unique	<p>Project design features for water quality and soil productivity include provision of soil restoration and limits to the amount of soil disturbance allowed an activity area. Additionally, the EA identifies decision making triggers for soils.</p> <p>Project design features for wildlife WFRP 3 & 4 are included for maintaining woody debris for habitat conservation.</p> <p>From the Soil Management Handbook: ‘Detrimental compaction, displacement, puddling, severe burning and erosion. No more than 15 percent of an activity area will be left in a detrimentally compacted, displaced, puddled, severely burned, and/or eroded condition. This does not include the permanent transportation system. The management measures applies to cumulative effects of management practices over time. If a standard is exceeded in an initial entry, future entries must have no additional detrimental effect unless mitigative measures have been applied or natural recovery has taken place between entries.’ This standard is outlined in the EA as a trigger point for soil resources.</p>	67

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Special Areas	In addition, the 2001 Roadless Area Conservation Rule identified 34,100 acres for roadless protection at Matchless Mountain. The 2001 Roadless Rule used inventoried roadless areas from forest plans that were in effect at the time the 2001 Rule was developed, or a roadless inventory that had undergone public involvement. However, large areas to the north of Matchless Mountain were removed by the GMUG's 2005 roadless area re-inventory, and the subsequent Colorado Roadless Rule rulemaking process removed significant acreage on Matchless Mountain from its final inventory, over the objection of HCCA and others. As part of the development of the Colorado Roadless Rule, in 2011 the Southern Rockies Conservation Alliance (or SRCA - an umbrella organization for approximately 25 Colorado-based conservation organizations, including HCCA), identified and recommended 42,800 acres for roadless protection at Matchless. ¹² These areas remain largely unroaded.	Reed	HCCA	Unique	The proposed action excludes the following from treatment: Designated Federal Wilderness, 2012 Colorado Roadless Areas, and the Fossil Ridge Recreation Management Area, as well as 48,000 acres excluded due to lack of forest cover or steep slopes. The 2001 RACR has been superseded by the 2012 Colorado Roadless Rule; Matchless Mountain roadless area acreage differences between those rules are beyond the scope of this analysis. Project complies with current rulemaking.	68
	There appears to be project overlap with roadless forest at Park Cone. The 2001 Roadless Rule Inventory of the 20,000-acre Crystal Creek area includes the Park Cone area. The SRCA inventory of this area found 6,500 acres. ¹³ The final Colorado Roadless Rule eliminated altogether the Park Cone area from its inventory. The Park Cone roadless area is bounded on the north and west by County road 742, on the south by private land along Lottis Creek, and on the east by forest road 752. The 12,100-foot symmetrical Park Cone peak is practically an island surrounded by Taylor Reservoir, Taylor River, Lottis Creek and its unnamed tributaries through Union Park. Although this is a relatively low summit, there is a significant distance between its low and high elevations giving it good prominence within the surrounding area. Potential habitat for lynx is found in this area. Opportunities for recreation in this area include visiting it from the nearby Lakeview campground and off-trail hiking to a prominent peak. HCCA and other groups advocated for the roadlessness of this area in 2011, and it remains largely unroaded. ¹⁴	Reed	HCCA	Unique	The proposed action excludes from treatment Designated Federal Wilderness, 2012 Colorado Roadless Areas, and the Fossil Ridge Recreation Management Area, as well as 48,000 acres excluded due to lack of forest cover or steep slopes. The 2001 RACR has been superseded by the 2012 Colorado Roadless Rule; Park Cone roadless area acreage differences between those rules are beyond the scope of this analysis. Project complies with current rulemaking.	69
	It also appears that there is project overlap with roadless forest at Red Mountain Creek. The SRCA inventory of this area found 4,900 acres. ¹⁵ The 2001 Roadless Rule Inventory found 3,900 roadless areas in the Red Mountain Creek area, part of the area named Elk Mountains - Collegiate. The Red Mountain Creek area was not included in the Colorado Roadless Rule inventory. The Red Mountain Creek area is bounded on the north and northeast by the Collegiate Peaks Wilderness Area, on the west and southwest by forest road 742 along the Taylor River and on the east by forest road 742. ^{3D} along Pieplant Creek. HCCA and other groups advocated for the roadlessness of this area in 2011, and it remains largely unroaded. ¹⁶	Reed	HCCA	Unique	The proposed action excludes from treatment Designated Federal Wilderness, 2012 Colorado Roadless Areas, and the Fossil Ridge Recreation Management Area, as well as 48,000 acres excluded due to lack of forest cover or steep slopes. The 2001 RACR has been superseded by the 2012 Colorado Roadless Rule; Red Mountain Creek roadless area acreage differences between those rules are beyond the scope of this analysis. Project complies with current rulemaking.	70

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Special Areas (continued)	In addition, an ongoing community public lands legislative effort, the Gunnison Public Lands Initiative (GPLI), includes acreage in its initial proposal that overlaps with the proposed project. ¹⁷ This includes the recommended Matchless Wilderness and the recommended Crystal Creek addition to the Fossil Ridge Wilderness. There is also project overlap with GPLI recommended special management areas (SMAs), including American Flag, Matchless, and Union Park. Each of the above areas is included in the GPLI Working Group for Public Lands Initial Report, which was released to the public in June of 2017 after a year-and-a-half of stakeholder meetings. ¹⁸	Reed	HCCA	Unique	The proposed action excludes from treatment Designated Federal Wilderness, 2012 Colorado Roadless Areas, and the Fossil Ridge Recreation Management Area, as well as 48,000 acres excluded due to lack of forest cover or steep slopes. While we recognize that GPLI has submitted a draft proposal there is no Forest Planning document or legislative action that has adopted any portion of this, as such we are operating under existing Forest Plan and designated areas direction.	71
Support	I support the Forest Service management/treatment of the Dwarf mistletoe as described in "Project Design Features" for the Private Parcel I own in Union Park.	Collard		Unique	Support noted	72
	Please acknowledge my support of your proposed project.	Farris		Unique	Support noted	73
	I agree with the proposed forest treatments.	Free		Unique	Support noted	74
	I fully support the Taylor Park vegetation management plan included in the proposed action plan: 2,811 acres of Fuel Treatments; 3,609 acres of Dwarf Mistletoe Edge Strip Cuts or Clearcut; 734 acres of Overstory Removal; 714 acres of Shelterwood Seed Cut; 741 acres of Group Selection in Spruce; 6,363 acres of Precommercial Thinning; 193 acres of Prescriptions To Be Determined, Mixed-species.	Dahl		Unique	Support noted	75
	I am writing in support of the "Taylor Park Vegetation Management Project" and the proposed management activities, which will harvest dwarf-mistletoe infected trees and salvage dead and dying trees killed by spruce beetle, mountain pine beetle, and Douglas-fir bark beetle.	Alspach, PE		Master Form	Support noted	76
	Overall, we are very supportive of the GMUG National Forests and their continued commitment to active forest management to improve forest health and resiliency including responding to the massive spruce beetle epidemic and aspen decline that is taking place throughout Southern Colorado, as well as proactively treating areas such as Taylor Park which are experiencing other types of forest issues. Therefore, this firm and our 93 direct employees, concur with the Purpose and Need for Action, as well as the Proposed Action.	Birtcher	Montrose Forest Products, LLC	Unique	Support noted	77
Treatment – Clearcut	While I understand the need to manage our forests, I question the need to clear cut 3,609 acres of forest to mitigate the Dwarf Mistletoe situation. The 'cure' is worse than the ailment, and I urge you to reconsider such a drastic endeavor. While the current plan might answer the Dwarf Mistletoe problem, it creates more destruction than necessary and would have serious consequences for wildlife and human recreation in those areas. I urge you to rethink this proposal to minimize impacts on wildlife and human recreation in the Taylor Park area.	Del Tredici		Unique	It is important to consider context in evaluating the intensity of the proposed action. The 3,600 acres that would be approved for the clearcut under the Alternative 1 is a maximum total treatment over a 10-year implementation period in a planning area of 276,000 acres. The EA includes analysis of impacts to wildlife and design features to lessen concerns with recreation. Treating these areas for dwarf mistletoe will have other benefits that are noted in the EA, such as age-class diversification and breaking-up of continuous fuels. Alternative 2's anticipated treatments for clearcuts are 3, 072 acres.	78

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Treatment – Clearcut (continued)	Clear cutting while appropriate on tree farms and such is not appropriate in areas with steep walls such as Taylor Park where it causes erosion and soils loss.	Hamilton		Unique	Areas with steep slopes were specifically eliminated from consideration for treatments. Appendix A: Implementation Checklist—Design Feature WQSP-5B	79
	I am particularly concerned with proposed clear-cut strips up to 300 feet wide or even larger that might have to be permanent to serve their stated purpose of eradicating mistletoe. This would fragment wildlife habitat for species needing forested habitat, including lynx and marten. It would also negatively affect watersheds, soils, scenery, recreational opportunities, and other resources. Please consider a much smaller project - one that concentrates timber cuts and other activities in the woodland-urban interface	Morrison		Unique	The proposed clear-cut strips would not be permanent, rather would be anticipated to regenerate young stands of lodgepole pine. The intention of the strip cuts is to protect the existing young healthy stands (free of dwarf mistletoe) from the infected adjacent stands. These strips would then regenerate young stands of lodgepole pine that are free from mistletoe and will not infect the original healthy stands. Areas proposed for clearcuts would be restocked with tree seedlings within five years of harvest, per the National Forest Management Act. Project effects on the resources listed are analyzed in the EA and/or mitigated by design features in Appendix A. The purpose and need for this project extend beyond the wildland/urban interface. See EA: Alternatives Considered but Eliminated from Detailed Study.	80
	In the past few years, the forest service has renewed clear cutting in the Park. We have observed the following negative impacts in this area due to that work: wind fall to remaining trees - the trees are a network and rely on each other for support as they grow; when neighboring trees are removed, the remaining trees are stressed and often cannot support themselves; so while the idea was to save Blue Spruces and other species from the clear cut, they are not surviving. soil erosion and increased road damage - building new roads will increase traffic in those area, both by presumed logging trucks and by tourist ATVs. The letter sent by District Ranger Matthew McCombs on April 13 states clear cuts will be limited to the regulated 40 acres. What we have observed in the Taylor Park area is that these 40 acre cuts are very close to each other and therefore are not truly 40 acre cuts, they must be considered as a larger cut because their effects combine to be much greater.	Murphy		Unique	The project includes provisions to limit windthrow. Clear cut sizes will be limited to 40 contiguous acres or less per Forest Plan standards. Project design features include measures for temporary road decommissioning and soils protection. Temporary roads will not be open to the public and will be decommissioned within 5 years.	81
	The many areas of the Taylor Park are somewhat dry and obviously all of it is at high altitude. These conditions do not support rapid regrowth of forests. Clear cuts will not be forested again, whether for product or for environmental benefit for likely many decades. Clear cutting does not continue the forest life, it diminishes it. It is a short term answer that creates long term problems.	Murphy		Unique	Clear cut treatments will be in lodgepole pine stands. Our experience is that these stands regenerate well after cuts. Areas proposed for clearcuts would be restocked with tree seedlings within five years of harvest, per the National Forest Management Act. The treatments will help to create diversity of age classes across the planning area which will increase resiliency.	82

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Treatment – Clearcut (continued)	<p>As previously stated, off-road activities are extensive in Taylor Park. What may seem an issue in harvesting of forest product and creating a safe and healthy forest is exacerbated by the heavy human and mechanized impact in this area. The forest service has allowed camping outside of their own established campgrounds in Taylor Park. This has extended the human impact beyond those specified areas. To open more clear cuts will extend the human impact into those areas as well. The paving of Cottonwood Pass will increase the numbers of tourists to the area and so increase an already heavy human impact. Any forest service plan in the Taylor Park area must take into consideration the additional impact of the already stressed use in this park area.</p>	Murphy		Unique	<p>Our analysis considers the existing conditions and use patterns in the project area in cumulative effects.</p> <p>Enforcement of camping restrictions is beyond the scope of the vegetation treatment project.</p> <p>The 2010 Travel Management Plan will be maintained as no new system roads will be created. Temporary roads will not be open to public use.</p>	83
	<p>We do not support clear cuts as a way to promote a healthy forest in the Taylor Park. The negative impacts of clear cutting are well documented. There are too many negative side effects of clear cutting to say that is proper husbandry of the area.</p>	Murphy		Unique	<p>The comment is noted. Patch and ring clear cuts, aside from fire, are the most effective method of treating infestations of lodgepole pine dwarf mistletoe and stopping its spread. Clear cutting is considered an appropriate method to meeting the project purpose and need.</p>	84
	<p>Clear-cutting large areas of the forest will have the opposite effect of mitigating the stressors of climate change and drought; stated purposes for the project. Large scale clear-cutting will exacerbate the negative effects of climate change and drought to the health of the forest. Areas cleared of trees, even though the trees are dead, are more susceptible to hotter temperatures and drought projected to occur with climate change. Exposed ground, devoid of the shade provided by dead trees, is hotter and subject to a higher level of moisture evaporation. Saplings struggle to grow under drought and increased temperatures. Considering climate change projections, clear-cut areas may never return to a forested condition.</p>	Witherell		Unique	<p>The proposed clearcuts would primarily be in green, mistletoe-infested lodgepole pine stands. These clearcuts would be limited to a maximum of 40 acres would be spread in space and time over the project area and 10 year implementation period. In our experience, clearcut lodgepole pine continues to regenerate well in the project area. Areas proposed for clearcuts would be restocked with tree seedlings within five years of harvest, per the National Forest Management Act. Lodgepole pine is an early-seral species, meaning it regenerates successfully under open conditions with full sunlight.</p>	85
	<p>Any areas considered for clear-cut should extend no more than 200 feet from infrastructure and should be limited to areas adjacent to campgrounds, picnic grounds, trailheads, or other public sites.</p>	Witherell		Unique	<p>The commenter's preference for alternatives limited to the wildland - urban interface and adjacent to existing infrastructure is noted. The purpose and need for this project includes concerns that extend well beyond the wildland/urban interface, including restoring forest resilience in responding to multiple stressors including climate change, drought, insect attack, and disease. See EA: Alternatives Considered but Eliminated from Detailed Study.</p>	86
	<p>It appears that there could be 3600 acres of clearcut, interspersed throughout. I realize that mistletoe and beetles are an issue on the forest, but feel that clearcutting so many acres of trees would be overkill, with unintended consequences. At high elevation, and particularly with increasing climate change conditions, these areas could take exceedingly long to regenerate, if they recover at all. Multi-age class trees, which are part of a healthy forest regime, would be lost. The loss of vital habitat would impact various species of wildlife, including lynx, and cause negative impacts to the ecosystem, due to roads, burning, and other associated incursions. Losing so many treed acres could cause erosion and contribute to degradation of water quality both on the forest and downstream.</p>	Navy		Unique	<p>While the project includes a large amount of clearcutting, it is important to keep that size in context. The total treatment area of 14,949 acres (Alternative 1) occurs on suitable lands within a larger project area of more than 276,000 acres. The proposed clearcuts would be scattered through suitable lands in this area in unit of 40 acres or smaller, and would be implemented over 10 years. The effect of the proposed action on habitat, water quality and soils is analyzed in the EA. Areas proposed for clearcuts would be restocked with tree seedlings within five years of harvest, per the National Forest Management Act. Clearcutting will overall increase the age class diversification in the project area.</p>	87

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Treatment – Clearcut (continued)	Please consider other methods of controlling infestations, if and where they are needed, using clearcutting only as a last resort in WUI's and not in remote areas at all.	Navy		Unique	Patch and ring clearcuts, aside from fire, are the most effective practical control of lodgepole pine dwarf mistletoe, and are an essential component of meeting the project purpose and need. See EA: Alternatives Considered but Eliminated from Detailed Study.	88
	no clearcutting	Atkins		Unique	Comment is noted.	89
	I am very concerned about an clear cutting.	Pearson		Unique	Comment is noted.	90
Treatment – Fuels	The map showing plans for the Taylor Park Vegetation Management includes fuel treatment in the Taylor Valley. This is presumed to be beetle kill removal. We support the removal of the dead trees if done in a thinning method and not by any clear cutting. The steep mountain slopes would not support clear cutting.	Murphy		Unique	We are unsure of area the commenter is specifically referring to by “Taylor Valley.” Fuel treatments include a range of treatment options and are disclosed in Appendix B. Slope restriction are included in Appendix A—WQSP-5B.	91
Treatment – Salvage	Salvage Clearcutting should be eliminated from the project or at least limited to small areas (less than 40 acres) in the wildland urban interface (WUI).	Witherell		Unique	Opinion noted. Salvage clearcuts are not anticipated to be a large component of the treatment, but are a tool we want to have available in the event of landscape scale infestation events.	92
	My comments concern the plans to "Salvage Clearcut" which call for removing all "dead, dying, or deteriorating trees" in large areas, which can be over 40 acres in size. The Taylor Park Vegetation Management EA Scoping/Comment Map did not clearly define which areas would be subject to "Salvage Clearcut."	Witherell		Unique	Salvage clearcuts and overstory removal are treatment options available if on-the-ground conditions warrant their use as determined by the Silviculture prescription matrix (Appendix B). No salvage treatments are currently anticipated, but forest conditions can change throughout the life of a project. This is one of the ways this project is built to be adaptable.	93
Tribal	_X_ NO EFFECT: I have determined that there are no properties of religious and cultural significance to the Southern Ute Indian Tribe that are listed on the National Register within the area of potential effect or that the proposed project will have no effect on any such properties that may be present	Atencio	Southern Ute Indian Tribe	Unique	Comment noted.	94
Vegetation	I would like to see more attention given to the invasive species. Oxeye Daisy is spreading across Taylor Park and needs to be addressed. Preventing the spread and treatment of all the noxious weeds needs to be part of this project.	Free		Unique	The project implementation plan will include invasive plant surveys and design features focused on preventing the spread and controlling invasive plants.	95

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Vegetation (continued)	<p>1. PROTECT RARE PLANTS AND FIGHT NOXIOUS WEEDS. Before any ground disturbing activities occur, areas within and adjacent to locations proposed for treatment or road building must first be surveyed for rare plant populations.⁵⁰ Any such populations must be marked and protected with a no-disturbance buffer sufficient to allow the populations to expand. The proposed lower limit of this buffer, 20 feet in design feature FSSP-10, is insufficient. We believe 100 feet should be the minimum buffer. All kinds of weed treatment must be located to avoid rare plants. The same surveys should identify noxious weeds. All such populations must be eradicated to the extent practicable before ground disturbance commences. Certainly, weed treatments in areas at high risk for weed infestation must eliminate much more than 50 percent of the weeds, contrary to proposed design feature IW-5. The goal should always be 100 percent eradication, even though it probably not possible to achieve full eradication. Survey and eradication should continue for at least three full growing seasons after ground disturbing activities have been completed, and be conducted in and adjacent to all areas of ground disturbance, not just in the areas of high risk for weed.⁵¹ Design feature FSSP-6, prohibiting the use of mechanical equipment within 100 feet of fens, is good and should be retained.</p>	Reed	HCCA	Unique	<p>The project implementation plan will include sensitive plant and invasive plant surveys prior to ground disturbance. We will retain the requirement of a for upland sensitive plants ranging from 20 to 100 feet, at the discretion of the project botanist.</p> <p>The goal of 100 percent eradication of weeds is not realistic. All identified weed infestations will be treated and monitored.</p> <p>IW-5 was a design feature carried over from SBEADMR. Through analysis and IDT consultation it was determined that IW-4 was covered the intention of IW-5 and was more appropriate for this project. As such IW-5 has been removed from Appendix A.</p>	96
	<p>Invasive Weeds * IW-2 - we ask that you add an exception for winter operations when cleaning equipment is grossly impractical.</p>	Pitts/Birtcher	Intermountain Forest Association/ Montrose Forest Products, LLC	Unique	<p>Equipment cleaning is necessary prior to entering FS land to prevent the spread of noxious weeds. In the winter, this requirement is sometimes waved in a written agreement between the Forest Service Contracting Officer and the timber purchaser.</p>	97
Wildlife	<p>I believe this Taylor Park proposal to be excessive. Most concerning is the damage that will occur to critical wildlife habitat, in particular for fragile species such marten and lynx.</p>	Zillioux		Unique	<p>Project effects to Canada lynx and American marten are analyzed in the EA. The Canada lynx is further analyzed in the Biological Assessment (BA) and USFWS were consulted on the project. The USFWS concurred with the BA determination.</p>	98

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Wildlife (continued)	<p>The 300 foot width is the opening size that begins to inhibit lynx movement.³⁵ Squires et al, 2010, found that lynx in Montana "avoided recent clear-cuts or other open patches."³⁶ "In winter, lynx do not appear to hunt in openings . . ."³⁷ Other species needing forested habitat would also be adversely affected. For example, marten tend to avoid areas without overhead tree cover, including clearcuts.³⁸ Some habitat for goshawk, boreal owl, golden-crowned kinglet, and olive-sided flycatcher could be eliminated by the proposed strip cuts. Thinning young stands, which may be done under the proposed project,³⁹ reduces the horizontal cover needed by snowshoe hare, lynx' favorite prey. This could lead to a considerable reduction in hare.⁴⁰ Even without any thinning, the numerous clearcut strips would reduce the quality of lynx habitat or even render some of it unsuitable, and could reduce habitat connectivity across the landscape and between and within lynx analysis units. That would violate the Southern Rockies Lynx Amendment (SRLA):⁴¹ Objective ALL Maintain or restore lynx habitat connectivity in and between LAUs, and in linkage areas. Standard ALL S1 New or expanded permanent developments and vegetation management projects must maintain habitat connectivity in an LAU and/or linkage area.⁴² With all the previous treatment in and near the project area, additional treatment as proposed could also violate Standards Veg S1 and Veg S2, requiring, respectively, that no more than 30 percent of the lynx habitat in a lynx analysis unit (LAU) be in unsuitable condition and that no more than 15 percent of an LAU can be made unsuitable in any ten-year period.⁴³ Cutting trees reduces future dead and down logs, some of which form denning habitat for lynx. Where trees are cut, some logs should be retained for possible lynx denning habitat.⁴⁴ Retaining down dead will also benefit other wildlife species and soils. Treatments in any area should avoid advance regeneration, except where it is the regeneration being treated. The young trees may provide, now or in the future, the dense horizontal cover needed by snowshoe hare, lynx' favorite prey. Overall, the impacts from implementing the mistletoe control treatments could be significant. If recent photos taken by HCCA staff of related treatments in the project area are indicative of things to come (see Attachment 6), the potential impacts of this project are troubling. Numerous and sizable forest openings would not be good for any species that needs forested habitat. The potential impacts to all species possibly present in the project area must be disclosed in the NEPA document prepared for the project, which, as discussed above in section I, should be an EIS. The NEPA document must demonstrate compliance with SRLA.</p>	Reed	HCCA	Unique	<p>The EA analyzed project impacts to wildlife, including Canada lynx.</p> <p>A BA was also prepared to analyze impact to lynx. We defer to the US Fish and Wildlife Service, which concurred with our determination that both Alternative 1 and 2 may affect, but is unlikely to adversely affect lynx.</p> <p>We are meeting SRLA objectives and will be tracking acres treated throughout implementation to ensure we stay within allowed standards (See Table 1 of the EA).</p>	99
	no further fragmentation of habitat or any other adverse effects on old growth dependent, endangered, threatened and sensitive species such as lynx, cutthroat trout, goshawk, marten	Atkins		Unique	Wildlife effects are analyzed in the EA. Further, the project includes design features to avoid adverse effects to endangered, threatened, or sensitive species.	100

Taylor Park Vegetation Management: Response to Scoping Comments

Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Wildlife (continued)	Wildlife, Fish and Rare Plants * WFRP-2 - we recommend adding language that clarifies the snag requirements are across the project area, not just the treatment acres.	Pitts/ Birtcher	Intermountain Forest Association/ Montrose Forest Products, LLC	Unique	We agree that the snag retention requirements are across a larger area than a single treatment unit. We believe the current language is adequate.	101
	<p>THE PROPOSED DWARF MISTLETOE TREATMENT IS EXCESSIVE AND WOULD FRAGMENT WILDLIFE HABITAT. Dwarf mistletoe is known to be very beneficial to the forest ecosystem. For example, bird species richness increases considerably in stands with dwarf mistletoe.²⁴ In fact: Our data suggest that dwarf mistletoes may have a positive effect on wildlife habitat. Consequently, we suggest that eradication efforts be reconsidered given that dwarf mistletoes have been part of these forest ecosystems for thousands, and possibly millions, of years.²⁵ Dwarf mistletoes attract various insects, including pollinators. This in turn attracts various predators.²⁶ Under the type of treatment named "Dwarf Mistletoe Edge Strip Cuts and Dwarf Mistletoe Clearcut," strips 100-300 feet wide adjacent to mistletoe-infected stands would be cleared (except for non- lodgepole pine and wildlife trees).²⁷ This would be applied to 3,605 acres in the project area.²⁸ These strips could be even wider if the residual strip between former clearcuts would leave only a "narrow strip of trees which would be vulnerable to windthrow," in which case "the entire strip would be removed."²⁹ Additional "Dwarf Mistletoe Clearcut[s]" could be done in areas proposed for shelterwood seed cut if any stands are dominated by lodgepole pine and infected with mistletoe.³⁰ If young stands are surrounded by mistletoe-infected stands, then at least some of the young trees are likely already infected with mistletoe. Depending on how old the "young" trees are (i. e., how long they have had to become infected), and how severe the infection in the surrounding overstory is, it may be too late to treat the surrounding stands to promote mistletoe-free younger stands. Stands may have mistletoe even if they do not show it, as the incubation period is 2-12 years, and typically 3-4 years, before shoots emerge.³¹ In any case, the proposed treatment is much more than would be needed to prevent or greatly reduce new infestation of the young stands, as mistletoe shoots only 50-75 feet, and "most seeds fall within 33 feet of the host tree or on other parts of the same tree."³² This is confirmed by Hawksworth et al, 2002, who stated: Although maximum horizontal displacement may reach 16 m [52.5 feet], 10 m [32.8 feet] is a more typical, free-flight distance Most seeds are displaced horizontally only 2 to 4 m and deposited lower in the crown.. ³³ Part of the strip might have to be permanently kept deforested to prevent infection of any regeneration from mistletoe-infected trees surrounding the cut strip.</p>	Reed	HCCA	Unique	<p>The comment includes some mischaracterizations of the project. We do not intend to eradicate lodgepole pine dwarf mistletoe in the forest, or even within the treatment area. The goal is establishing new stands that are mistletoe free and reducing the spread of mistletoe. For context, we are proposing to treat approximately 3,600 of infested lodgepole pine forest, while a conservative estimate of mistletoe toe infested lodgepole pine forest in the Gunnison Ranger District is 138,000 acres.</p> <p>"There is little or no evidence that the success or abundance of animals is affected by the presence of witches' brooms, and no indication that any mammal or bird in the United States depends on dwarf mistletoe." Worrall 2018.</p> <p>Regardless, even with the proposed treatments, due to the level of infestation in the project area (more than 52 percent of trees infested), there would still be large amounts of infested trees and stands available for wildlife benefit. Areas proposed for clearcuts would be restocked with tree seedlings within five years of harvest, per the National Forest Management Act. They are not proposed to be permanent clearings.</p>	102

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Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks	Comment Number
Wildlife (continued)	<p>It would very undesirable to have young trees infected with mistletoe because: Seedlings are especially vulnerable; a single mistletoe infection on the seedling is either lethal or so damaging the host sapling appears more like a bush than a tree.³⁴ In other words, cutting strips would not be sufficient to reduce mistletoe, as they would have to be continually treated and left deforested. It seems that mistletoe control in a large area like Taylor Park that has long been had mistletoe throughout is futile. The scoping map shows the proposed mistletoe treatment areas throughout the project area, surrounding young stand pre-commercial or sanitation treatments. Thus, there would be large areas with no trees on them in the project area if the project as currently proposed was implemented.</p>					

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Attachments	Attachment 1 - Reducing the Wildland Fire Threat to Homes: Where and How Much?	Reed	HCCA	Unique	Reference is discussing defensible space with the intent of protecting homes. This area is very important for the specific protection of a structure from ignition; however, there are more concerns than simply structure protection that go into consideration of the WUI (e.g., human life, both firefighter and civilians, and effective fire suppression operations near assets). Additionally, treating a larger area provides more opportunity to allow natural ignition to burn with minimal influence from fire suppression efforts.
	Attachment 2 - The Wildland-Urban Interface Fire Problem, A Consequence Of The Fire Exclusion Paradigm	Reed	HCCA	Unique	Commenter uses reference to support reducing treatment areas to focus on defensible space with the intent of protecting infrastructure. This area is very important for the specific protection of a structure from ignition; however, there are more concerns than simply structure protection that go into consideration of the WUI (e.g., human life, both firefighter and civilians, and effective fire suppression operations near assets). Additionally, treating a larger area provides more opportunity to allow natural ignition to burn with minimal influence from fire suppression efforts.
	Attachment 3 - Mountains to Mesas. Conservation Management Alternative For Protecting Biological Diversity and Ecosystem Health on the Grand Mesa, Uncompahgre, and Gunnison National Forest	Reed	HCCA	Unique	See Alternatives Considered but Eliminated from Detailed Study
	Attachment 4 - The Influence of Dwarf Mistletoe on Bird Communities in Colorado Ponderosa Pine Forests	Reed	HCCA	Unique	Reference considered and discussed in Worrall 2018
	Attachment 5 - Seasonal Resource Selection of Canada Lynx in Managed Forests of the Northern Rocky Mountains	Reed	HCCA	Unique	Commenter references this citation to emphasis the importance of wildlife corridors. This is considered in project design and treatment layout.
	Attachment 6 - Photos Taken by HCCA Staff on May 19, 2018	Reed	HCCA	Unique	Photos received
	Attachment A: Map	Melton	Center For Biological Diversity	Unique	SBEADMR is considered in cumulative effect.
References/ Lit Cited	Cohen, Jack D., 1999. Reducing the Wildland Fire Threat to Homes: Where and How Much? In: Proceedings of the Symposium on Fire Economics, Planning, and Policy: Bottom Lines, April 5-9, 1999 San Diego, California. USDA Forest Service General Technical Report PSW-GTR-173, at 192: "SIAM modeling, crown fire experiments, and W-UI fire case studies show that effective fuel modification for reducing potential W-UI fire losses need only occur within a few tens of meters from a home, not hundreds of meters or more from a home." Available at https://www.fs.usda.gov/treesearch/pubs/5603 . Attachment 1.	Reed	HCCA	Unique	Reference is discussing defensible space with the intent of protecting homes. This area is very important for the specific protection of a structure from ignition; however, there are more concerns than simply structure protection that go into consideration of the WUI (e.g., human life, both firefighter and civilians, and effective fire suppression operations near assets). Additionally, treating a larger area provides more opportunity to allow natural ignition to burn with minimal influence from fire suppression efforts.
	See also Cohen, Jack, 2008. The Wildland-Urban Interface Fire Problem, A Consequence Of The Fire Exclusion Paradigm. Forest History Today (Fall 2008). Attachment 2.	Reed	HCCA	Unique	Commenter uses reference to support reducing treatment areas to focus on defensible space with the intent of protecting infrastructure. This area is very important for the specific protection of a structure from ignition; however, there are more concerns than simply structure protection that go into consideration of the WUI (e.g., human life, both firefighter and civilians, and effective fire suppression operations near assets). Additionally, treating a larger area provides more opportunity to allow natural ignition to burn with minimal influence from fire suppression efforts.

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Comment Category	Comment	Commenter Last Name	Commenter Organization Name	Letter Type	Remarks
References/ Lit Cited (continued)	See Colorado Roadless Area Conservation, National Forest System Lands Proposed Rule and Revised Draft EIS, Summary of Public Comment, NSG NEPA Services Group (September 2011), at 4-67. Available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5366317.pdf .	Reed	HCCA	Unique	Project is compliance with the 2012 Colorado Roadless Rule and the current designations.
	See https://www.gunnisonpubliclands.org/explore-the-map/ .	Reed	HCCA	Unique	See Alternatives Considered but Eliminated from Detailed Study
	See https://static1.squarespace.com/static/53973ed8e4b0ac2dcfe3932c/t/5a3959af71c10b916d2aacc0/1513707961656/WG+Report+-+17.12.5+-+small.pdf .	Reed	HCCA	Unique	See Alternatives Considered but Eliminated from Detailed Study
	See Bennetts, Robert E., Gary C. White, Frank G. Hawksworth, and Scott E. Severs, 1996. The Influence of Dwarf Mistletoe on Bird Communities in Colorado Ponderosa Pine Forests. <i>Ecological Applications</i> 6(3), pp. 899-909.	Reed	HCCA	Unique	Reference considered and discussed in Worrall 2018
	Geils, B. W., and F. G. Hawksworth, 2002. Damage, Effects, and Importance of Dwarf Mistletoes. In: <i>Mistletoes of North American Conifers</i> . USDA Forest Service, Brian W. Geils, Jose Cibrián Tova, and Benjamin Moody, technical coordinators. General Technical Report RMRS-GTR-98, September 2002, at 62. Available at https://www.fs.fed.us/rm/pubs/rmrs_gtr098/rmrs_gtr098_057_065.pdf .	Reed	HCCA	Unique	Reference considered and discussed in Worrall 2018
	Hawksworth, F. G, D. Weins, and B. W. Geils, 2002. Arceuthobium in North America. In: <i>Mistletoes of North American Conifers</i> . USDA Forest Service, General Technical Report RMRS-GTR-98, September 2002, at 31. Available at https://www.fs.fed.us/rm/pubs/rmrs_gtr098.pdf .	Reed	HCCA	Unique	Reference considered and discussed in Worrall 2018
	Geils and Hawksworth, 2002, at 58.	Reed	HCCA	Unique	Reference considered and discussed in Worrall 2018
	See Aubry, Keith B, Gary M. Koehler, and John R. Squires, 1999. Ecology of Canada Lynx in Southern Boreal Forests. In: <i>Ecology and Conservation of Lynx in the United States</i> . USDA Forest Service General Technical Report RMRS GTR-30WWW, October, 1999. Available at https://www.fs.usda.gov/treesearch/pubs/50636 .	Reed	HCCA	Unique	Commenter references this citation to emphasis the importance of wildlife corridors. This is considered in project design and treatment layout.
	Squires, John R., Nicholas J. Decesare, Jay A. Kolbe, and Leonard F. Ruggiero, 2010. Seasonal Resource Selection of Canada Lynx in Managed Forests of the Northern Rocky Mountains. <i>Journal of Wildlife Management</i> 74(8):1648-1660; 2010; DOI: 10.2193/2009-184, at 1648. Available at https://www.fs.usda.gov/treesearch/pubs/50160 . Attachment 5.	Reed	HCCA	Unique	Commenter references this citation to emphasis the importance of wildlife corridors. This is considered in project design and treatment layout.
	ILBT, 2013. Interagency Lynx Biology Team. 2013. Canada Lynx Conservation Assessment and Strategy. 3rd edition. USDA Forest Service, USDI Fish and Wildlife Service, USDI Bureau of Land Management, and USDI National Park Service. Forest Service Publication R1-13-19, Missoula, MT. 128 pp. at 28; citations omitted. Available at https://www.fs.fed.us/biology/resources/pubs/wildlife/LCAS_revisedAugust2013.pdf .	Reed	HCCA	Unique	Commenter references this citation to emphasis the importance of wildlife corridors. This is considered in project design and treatment layout.
	Buskirk, Steven M., and Leonard F. Ruggiero, 1994. American Marten. In: <i>The Scientific Basis for Conserving Forest Carnivores: American Marten, Fisher, Lynx, and Wolverine in the Western United States</i> . USDA Forest Service, General Technical Report RM-254. Available at https://www.fs.fed.us/rm/pubs_rm/rm_gtr254.pdf . Marten is a sensitive species in Forest Service Region 2.	Reed	HCCA	Unique	Commenter references this citation to emphasis the importance of wildlife corridors. This is considered in project design and treatment layout.
	This document, establishing forest plan objectives, standards, and guidelines for forest plans in Region 2, is formally titled "Southern Rockies Lynx Management Direction". We use both names in our comments here. 42 Southern Rockies Lynx Management Direction (or SRLA), Record of Decision at Attachment 1-1.	Reed	HCCA	Unique	The project is in compliance with the SRLA.
	Montrose Forest Products is clearly the largest buyer of GMUG timber, as it is "the purchaser of the majority of the GMUG's large timber sales", and it "processes most of the wood removed from the [GMUG]". Revised Draft Timber and Vegetation Management Assessment (prepared for the GMUG management plan revision) at 2 and 12. 48 At 61.	Reed	HCCA	Unique	GMUG Document
	See Soil Management Handbook, FSH 2509.18, R2 Supplement No. 2509.18-92-1, at 2.2 (4).	Reed	HCCA	Unique	Forest Service policy document.

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References/ Lit Cited (continued)	Black, S.H. et al. 2013. Do bark beetle outbreaks increase wildfire risks in the Central U.S. Rocky Mountains: Implications from Recent Research. <i>Natural Areas Journal</i> 33: 59-65	Melton	Center For Biological Diversity	Unique	High-severity fire decreases stand susceptibility to bark beetles because the fire kills the large trees and a new generation of smaller, non-susceptible trees are established. The proposed action includes management treatments that mimic stand replacing fire events, primarily clearcuts in lodgepole pine. Development and analysis of the proposed action as relied on best available science as determined by the professional judgement of Forest Service resource specialists. Analysis in the EA shows that the proposed action would increase the size and age diversity of the project area, which will increase resiliency to multiple stressors including climate change.
	Hart, S.J. et al. 2015b. Negative feedbacks on bark beetle outbreaks: widespread and severe spruce beetle infestation restricts subsequent infestation. <i>PLoS ONE</i> 10(5): e0127975	Melton	Center For Biological Diversity	Unique	Similar to the response above, severe spruce beetle outbreaks kill the large trees and a new generation of smaller, non-susceptible trees are established. Since beetles attach larger trees, the young stands are less susceptible.
	Kulakowski, D. et al. 2012. Stand-replacing fires reduce susceptibility of lodgepole pine to mountain pine beetle outbreaks in Colorado. <i>Journal of Biogeography</i> 39: 2052-60	Melton	Center For Biological Diversity	Unique	High-severity fire decreases stand susceptibility to bark beetles because the fire kills the large trees and a new generation of smaller, non-susceptible trees are established.
	Seidl, R. et al. 2016. Spatial variability in tree regeneration after wildfire delays and dampens future bark beetle outbreaks. <i>PNAS</i> 113: 13075-13080	Melton	Center For Biological Diversity	Unique	High-severity fire decreases stand susceptibility to bark beetles because the fire kills the large trees and a new generation of smaller, non-susceptible trees are established.
	Six, D.L. et al. 2014. Management for mountain pine beetle outbreak suppression: does relevant science support current policy? <i>Forests</i> 5: 103-133	Melton	Center For Biological Diversity	Unique	Treatments are intended to increase resiliency across the greater landscape by increasing diversity of age classes and not necessarily in individual stands.
	Veblen, T.T. et al. 1994. Disturbance regime and disturbance interactions in a Rocky Mountain subalpine forest. <i>Journal of Ecology</i> 82: 125-35	Melton	Center For Biological Diversity	Unique	High-severity fire decreases stand susceptibility to bark beetles because the fire kills the large trees and a new generation of smaller, non-susceptible trees are established. The proposed action includes management treatments that mimic stand replacing fire events, primarily clearcuts in lodgepole pine. Development and analysis of the proposed action as relied on best available science as determined by the professional judgement of Forest Service resource specialists. Analysis in the EA shows that the proposed action would increase the size and age diversity of the project area, which will increase resiliency to multiple stressors including climate change.