
File Code: 1570
Date: April 27, 2020

Ms. Molly Pitts
Intermountain Forest Association
2218 Jackson Blvd, Ste 10
Rapid City, SD 57702

Dear Ms. Pitts:

On February 27, 2020, the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG), Gunnison Ranger District, published a legal notice in the Gunnison Country Times initiating the 30-day objection filing period for the Taylor Park Vegetation Management Project Environmental Assessment (EA), Finding of No Significant Impact (FONSI), and the draft Decision Notice (Draft DN) selecting Alternative 2 as identified in the EA. Subsequently, I received your timely objection to this project on March 5, 2020. This objection was submitted on behalf of Intermountain Forest Association.

Objectors met with me, Tony Edwards, Reviewing Officer, Matt McCombs, Gunnison District Ranger and other GMUG staff on April 10 and on April 22, 2020, to seek resolution objections per 36 CFR §218.11. We appreciate the time you have taken to clarify issues and discuss your objection issues.

OVERVIEW OF PROJECT

Purpose and Need

The primary purpose of this project is to increase the forest's ability to respond to multiple and interactive forest stressors including climate change, drought, insect attack, or disease while promoting safety and reducing fuel loading in the wildland-urban interface and surrounding areas. Based on existing conditions and forest plan direction, the need for action is to manage forest vegetation to bring current and foreseeable conditions closer to desired conditions on landscapes where commercial harvest, mechanical treatments, or fire can be implemented appropriately and effectively. This project is being developed under the authority of the Healthy Forest Restoration Act (P.L. 108-148).

The secondary purpose of this project is to provide wood products for the local economy that relies on wood fiber harvested sustainably from public lands.

The project would implement management direction identified in the forest plan, by responding to goals and objectives and would move the planning area toward desired conditions (III-1 through III-5). Specifically, the forest plan goal for vegetation is to “manage vegetation in a manner to provide and maintain a healthy and vigorous ecosystem resistant to insects, diseases and other natural and human causes.”



Alternatives

Two action alternatives were analyzed in accordance with 36 CFR 220.7(b)(2) and HFRA Sec 10

Both alternatives analyzed in detail include using an implementation process that requires the use of design features, management triggers, continued public involvement and monitoring.

4(c)(1)(c).

Project Objectives

Treat stands to improve forest health using commercial harvest, non-commercial, and prescribed fire treatments, as appropriate, to the site-specific situation.

- Protect young, healthy stands of lodgepole pine from infestation by dwarf mistletoe through harvesting infested stands and treatment of adjacent strips and stands.
- Salvage trees killed by spruce bark beetle, mountain pine beetle, Douglas-fir bark beetle and wildfire for commercial wood products.
- Pre-commercially thin young stands of lodgepole pine to increase or maintain growth rates.

Reduce fuels in wildland-urban interface areas to allow for the facilitation of natural fire processes on the landscape.

- In the wildland-urban interface, reduce the potential for crown fire by reducing or breaking up canopy continuity, decrease potential surface fire intensity via reduced surface fuels, and improving tree health and vigor; this will provide for more opportunity to allow natural ignitions to burn with minimal influence from fire suppression efforts.

Provide wood products for the local economy, which relies on wood fiber harvested sustainably from public lands.

- Provide lodgepole pine and Engelmann spruce sawtimber and other forest products such as firewood, fence posts, and corral poles from suited timber in the watershed. Focus is on dwarf mistletoe infested stands and spruce resiliency treatments outside of SBEADMR treatment units. Proposed commercial harvest would be in addition to, and in conjunction with that of SBEADMR. Information on the SBEADMR project can be found at <https://www.fs.usda.gov/detail/gmug/home/?cid=fseprd497061>.

Remove hazard trees along open public roads.

Alternative 1: Proposed Action

Alternative 1 contains various vegetation treatments covering 14,949 acres. During implementation, treatments within polygons identified in the EA would be based on the current conditions and determined by the Silvicultural Matrix in Appendix B of the EA. For instance, if conditions result in mortality, then a salvage treatment would be implemented instead of a green tree treatment and wood products, where merchantable trees exist, would be removed.

Alternative 1 estimated use of 183 miles of existing public roads, 30 miles of administrative roads, 78 miles of temporary roads using existing road templates, and constructing 37 miles of new temporary roads. Temporary roads would be closed after use.

Alternative 2

Alternative 2 was created from comments presented during the Preliminary Environmental Analysis comment period, meetings with the adaptive management group and interested stakeholders, and in collaboration with the science team. One of the main concerns in developing this alternative focused on reducing temporary road construction. The implementation window was extended to allow more time for added broadscale prescribed burning treatments under desired conditions. Additionally, larger Contingency Treatment Areas were included that mostly overlap the proposed treatments.

Alternative 2 contains 17,714 acres of various anticipated vegetation treatments. For anticipated treatments, Alternative 2 estimated use of 181 miles of existing public roads for commercial and non-commercial treatments, 74 miles of existing public roads for non-commercial treatments, 34 miles of administrative roads, 24 miles of temporary roads using existing road templates, and constructing 23 miles of new temporary roads. Temporary roads would be closed after use. Additional road miles would likely be needed if Contingency Treatment Areas would be treated.

If contingency treatments were implemented the project area would be extended consistent with the design features and limited by management triggers, but would not assume treatment of all acres covered by polygons displayed on maps in EA.

The No Action Alternative serves as a basis for comparing the effects of the action alternatives. This alternative represents no attempt to actively respond to the issues, purpose and need for action or concerns identified during public scoping for this project. There would be no effort to modify existing conditions, unless authorized by other decisions.

OBJECTION RESPONSES

Concern Statement 1-The objectors allege that the yellow and red-light triggers are equivalent under the watershed decision-making triggers for adaptive implementation (Environmental Assessment (EA) p.22).

Analysis 1

Table 1 in the EA (p.22) outlines management objectives, indicators, and adaptive management actions for yellow light triggers when legal or project standards are starting to be approached and red-light triggers when legal or project standards would be crossed. In the EA (p.22) for watershed, the yellow light trigger adaptive management action is to ‘Discontinue or reduce acres of treatment in watershed so 25% threshold not exceeded.’ The red light trigger adaptive management action is to ‘Discontinue treatments in suitable watersheds until recovery has occurred.’ As currently written, with both the yellow and red-light triggers including ‘discontinue treatments’ as part of the adaptive management action, they could both have the same result. Removal of the word ‘discontinue’ from the yellow light trigger would provide the intended alert, but not result in consequences equivalent to the red-light trigger.

Conclusion 1

Removal of the word ‘discontinue’ from the yellow light trigger (but retaining the other adaptive management actions) would still meet the intent of the yellow light trigger of providing notice that the red light trigger is being approached, but not having the same result as the red light trigger.

Per my discussion with objectors, I recommend providing clarification in the yellow light trigger.

Concern Statement 2-The objectors allege that the design feature Invasive Weeds: IW-3B (Appendix A) could drastically affect a sale that has already been purchased by deferring cut units and/or stands within priority areas throughout the implementation period of the proposed action if new invasive plants are discovered.

Analysis 2

Standard Contract provision B6.35 (Equipment Cleaning) of the 2400-6 Timber Sale Contract states how off-road equipment will be treated with Invasive Weeds on timber sales under contract. Provision B8.33 (Contract Suspension and Modification) of the 2400-6 Timber Sale Contract states: (a) Contracting Officer may, by written order, delay, or interrupt authorized operations under this contract or, notwithstanding B8.3, modify this contract, in whole, or in part: (i) To prevent environmental degradation or resource damage, including, but not limited to, harm to habitat, plants, animals, cultural resources, or cave resources. B8.33 also states Purchaser’s remedy options shall be: (i) Contract Term Adjustment, (ii) reimbursement for Out-of-Pocket Expenses, (iii) rate redetermination to measure any decline in the market, (iv) temporary reduction of down payment, (v) temporary credit for unamortized Specified Road construction cost, and (vi) temporary bond reduction.

Conclusion 2

Based on my review of the analysis, Invasive Weeds Design Feature IW-3B is consistent with and will be handled through the standard contract provision on timber sales that have already been purchased and the responsible official has met the requirements of NEPA.

Concern Statement 3-Referring to Appendix A. Design Features – Recreation: REC-2, objectors note the importance of special use permits and concessionaire programs, but 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.

Analysis 3

This concern was raised during the public review of the draft EA (Taylor Park Public Comment Period – Comment Summary and Responses, p.12).

The GMUG provided a response to this concern. That response referenced the GMUG Spruce Beetle Epidemic and Aspen Decline Management Response (SBEADMR) project including the flexibility the design feature has given the agency to perform needed treatments, when necessary,

to manage these sites. Furthermore, the GMUG explained that the unit will work with special use holders and potential harvest operators to accommodate schedules to the extent possible (Taylor Park Public Comment Period – Comment Summary and Responses, p.12).

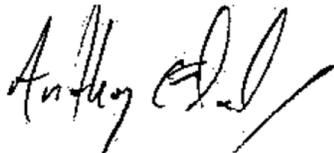
Conclusion 3

I find that the responsible official has adequately addressed the concerns of the objectors regarding this design criteria.

If you have any questions or concerns regarding this letter, please contact Niccole Mortenson, NEPA Specialist, at 970-874-6693 or niccole.mortenson@usda.gov.

This response is not subject to further administrative review by the Forest Service or the United States Department of Agriculture pursuant to 36 CFR 218.11(b)(2).

Sincerely,

A handwritten signature in black ink, appearing to read "Chad Stewart". The signature is stylized and cursive.

For CHAD STEWART
Forest Supervisor

cc: lucy.g.maldonado@usda.gov; coloradopitts@gmail.com