



United States  
Department of  
Agriculture

Forest  
Service

Canyon Lakes  
Ranger  
District

1311 South College Avenue  
Fort Collins, CO 80524  
(970) 498-1375

File Code: 1950

Date: September 25, 2001

*MM*  
*MM*  
*DOJ*  
*SJA*  
*TJ*  
*K-*  
*Stringtown*

Dear Interested Party,

The USDA Forest Service, Arapaho and Roosevelt National Forests, Canyon Lakes Ranger District, has prepared a Categorical Exclusion for the Stringtown Gulch Fuels Reduction Project. The purpose of this letter is to provide you, an interested or involved party, the opportunity to request a copy of the Decision Memo pertaining to this project.

After careful review of Forest Plan direction, the project file, and issues raised during scoping and their resolution, I have made the decision to implement the proposed activities, including conditions and mitigation measures as described in the Decision Memo. Based upon an environmental analysis and past experience, the effects of implementing this action will be of limited context and intensity and will result in little or no environmental effects to the physical or biological components of the environment. Further, for reasons detailed in the Decision Memo, I have decided that these actions can be implemented as described without further NEPA documentation.

This decision is not subject to appeal pursuant to Forest Service Regulations at 36 CFR 215.8.

Please contact Dave Hattis at the Canyon Lakes Ranger Station if you would like a copy of the Decision Memo or have any questions about this project. Our telephone numbers are:

Phone: (970) 498-1350  
Fax: (970) 498-2727

Or send written requests for the Decision Memo to:

Stringtown Gulch Fuels Reduction Project CE  
Canyon Lakes Ranger District  
1311 South College Ave.  
Ft. Collins, CO 80524-4147

Sincerely,

*Ellen L. Hodges*

ELLEN L. HODGES  
District Ranger





United States  
Department of  
Agriculture

Forest Service ● Canyon Lakes  
Ranger District

1311 South College Avenue  
Fort Collins, CO 80524

Voice: (970) 498-1375 TDD: (970) 498-2769 or 2707

Web: [www.fs.fed.us/r2/arnf](http://www.fs.fed.us/r2/arnf)

Fax: (970) 498-2727 or 498-2726

~~MB~~  
m  
DA  
SS  
BB  
K

File Code: 1950-1  
Date: June 19, 2001

Dear Interested Party:

The Canyon Lakes Ranger District is nearing the completion of the environmental analysis of the Stringtown Gulch Fuels Reduction Project. The attached map indicates the general location of the Project Area, specific location of the treatment units and summarizes the proposed vegetation management prescribed for each unit.

The Stringtown Gulch Fuels Reduction Project entails two stages of vegetation management. The first proposed action is to mechanically thin the predominately overstocked ponderosa pine stands followed by the second treatment of using nonlethal prescribed fire. Thinning will reduce the number of trees per acre and the fuel loading will be treated to decrease the potential risk of crown fire initiation and spread. This will effectively reduce the threat of wildfires, which will improve the safety of residents living in the Stringtown Gulch wildland fire interface. This treatment will beneficially alter wildlife habitat by creating forest openings where grasses and forbs will flourish. In addition, large diameter ponderosa pine will be retained to enhance old growth stand conditions.

This project is designed to create a defensible fuels profile zone. As described above, when implemented, the risk of wildfire in the Stringtown Gulch area will be reduced, partially meeting the District's obligation in achieving a key point of the National Fire Plan. (National Fire Plan information is available at <http://www.na.fs.fed.us/nfp/>)

Public input was solicited and the comments that were received were considered in the analysis and the project design. The status of this project has been updated regularly in the Forest Schedule of Proposed Actions for NEPA Analysis and Public Input (available at the Forest Web site listed above).

The Stringtown Gulch Fuels Reduction Project analysis, including all wildlife surveys will be completed soon. I anticipate that a Decision Memo [FSH 1909.15, Chap. 30, Sec. 31.2(6); 36 CFR 215.8(4)] will be issued in July 2001.

If you are interested in additional information about this project or a copy of the Decision Memo when it is issued, please contact Dave Hattis, the Project Forester at (970) 498-1350 or [dhattis@fs.fed.us](mailto:dhattis@fs.fed.us).

Sincerely,

*Ellen L. Hodges*  
ELLEN L. HODGES  
District Ranger

Enclosure: Map



# Stringtown Gulch Fuels Reduction Project

## Treatment Areas

(Areas are outlined with the unit identifier circled)

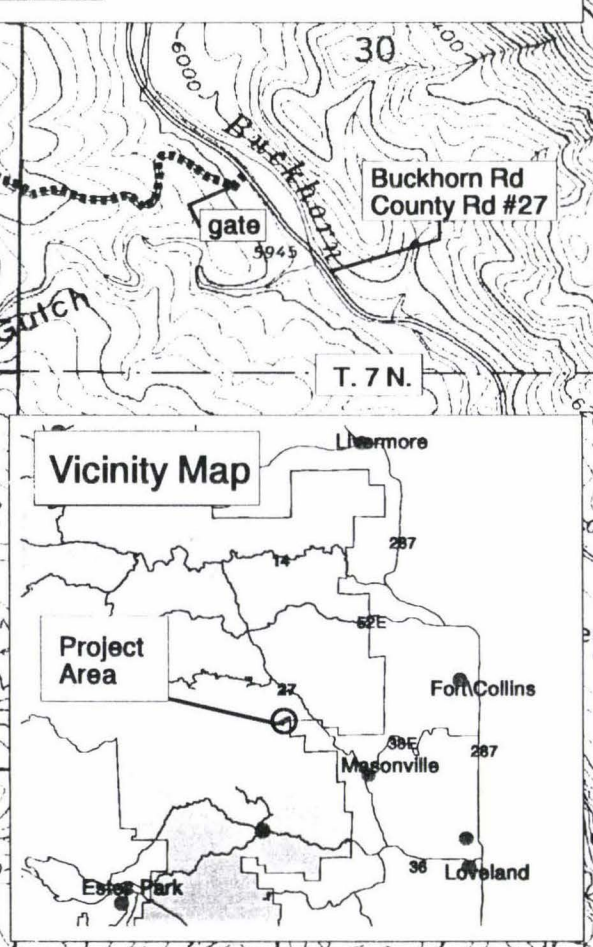
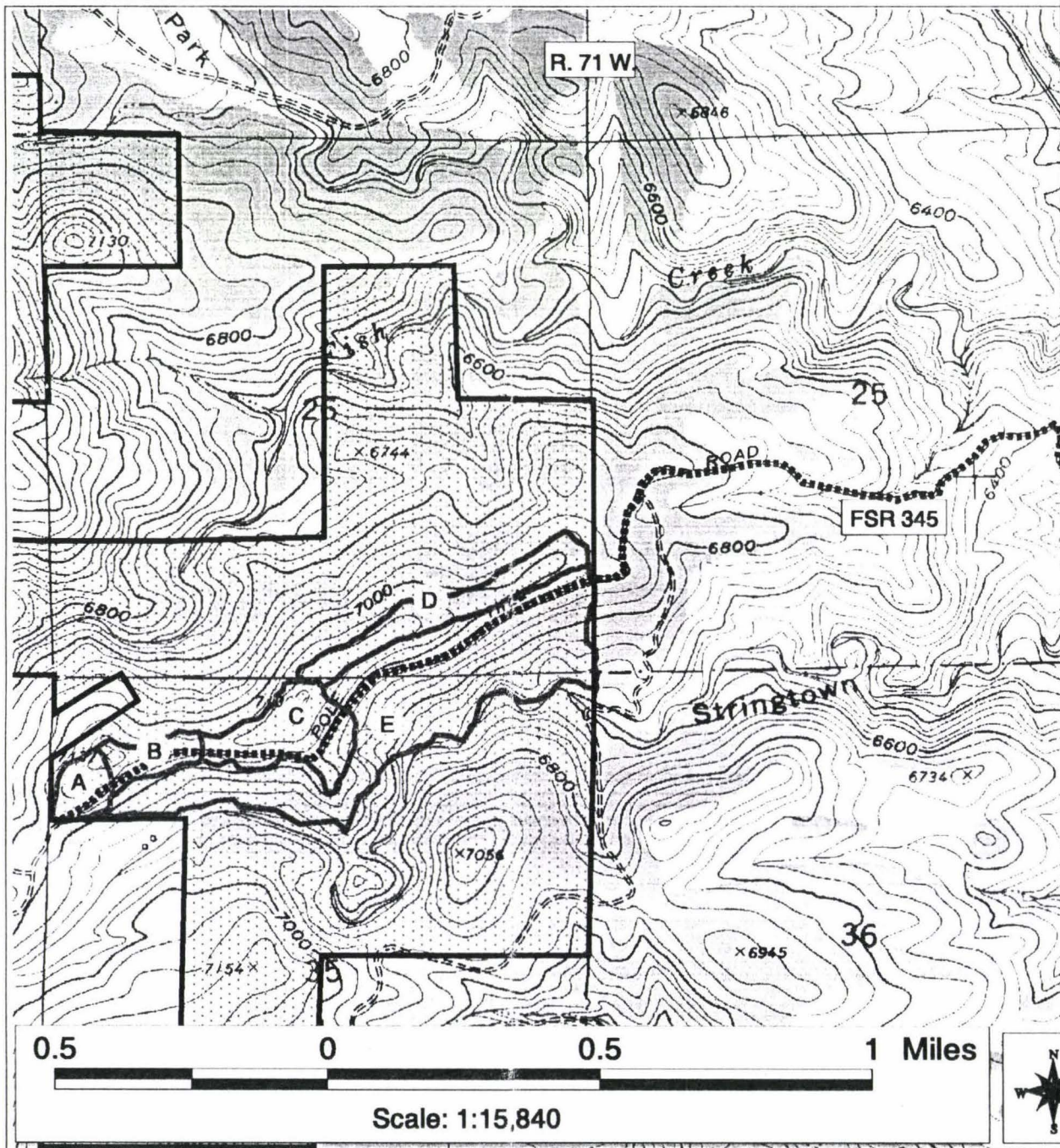
Unit	Acres	Prescription
A	6.5	Shelterwood Removal
B	7.4	Low Thinning (thin from below)
C	19.4	Low Thinning (thin from below)
D	18.9	Low Thinning (thin from below)
E	92.0	Free Thinning

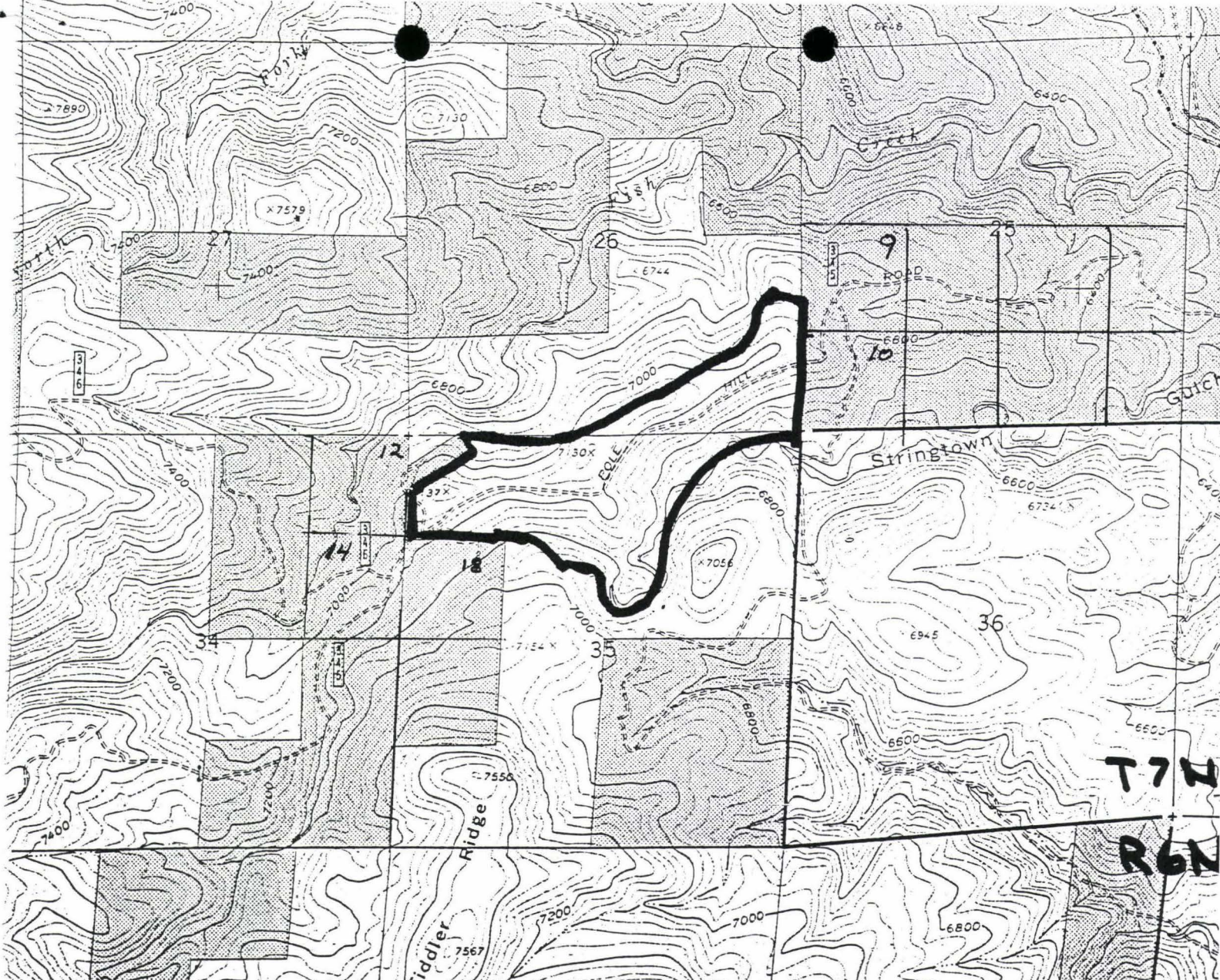
Following mechanical treatment, (Units A-E:144 acres) will be treated by a non-lethal understory prescribed fire.

Distances:

Gate to east end of project area: 1.7 miles  
 Gate to west end of project area: 2.8 miles

 National Forest Land

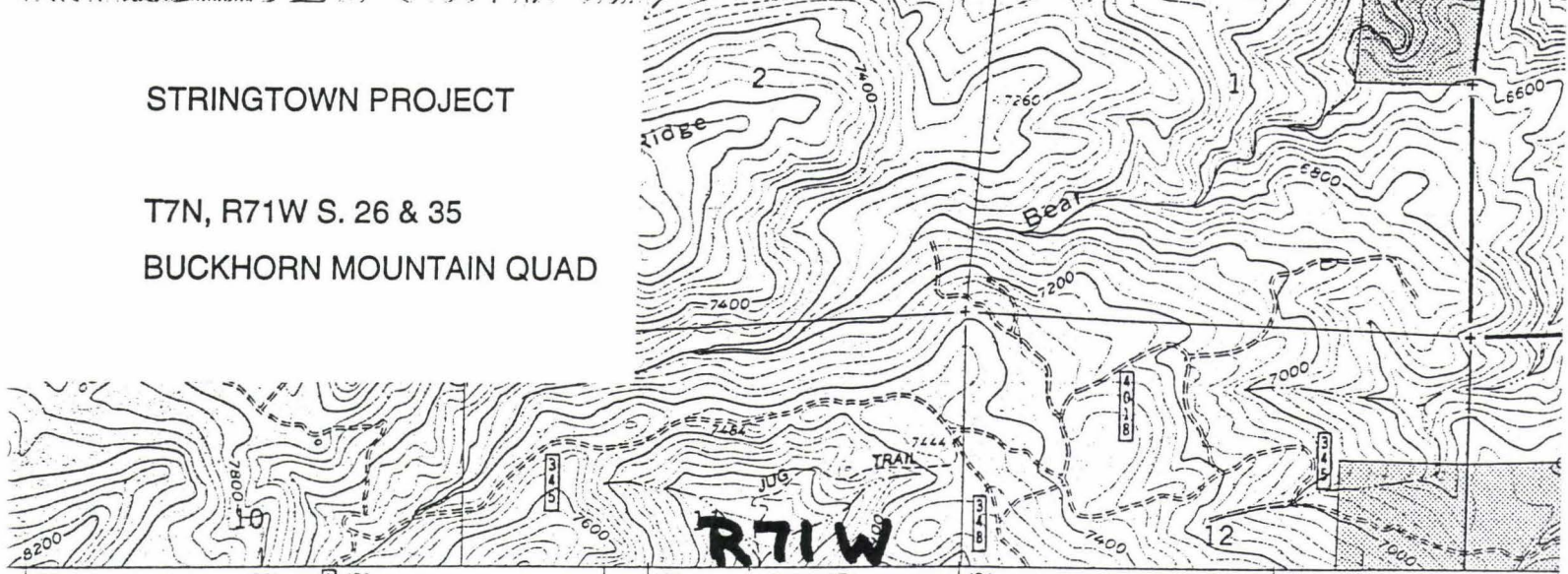




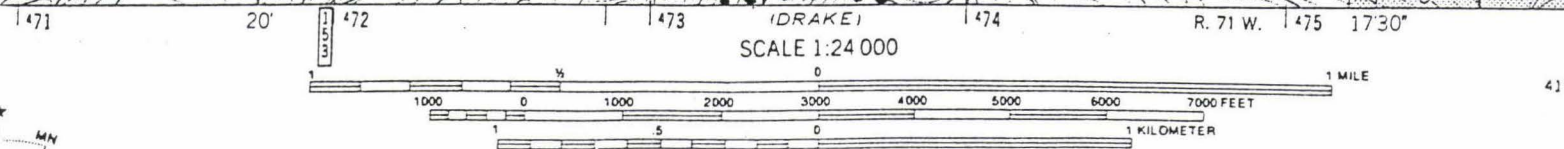
STRINGTOWN PROJECT

T7N, R71W S. 26 & 35

BUCKHORN MOUNTAIN QUAD

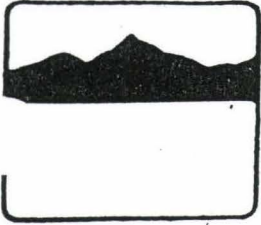


R71W



CONTOUR INTERVAL 40 FEET





colorado  
environmental  
coalition

Main Office  
777 Grant Street, Suite 606  
Denver, Colorado 80203  
(303) 837-8701 fax (303) 837-8718

West Slope Office  
P.O. Box 2583  
Grand Junction, Colorado 81502  
(970) 243-0002

Paul Langowski  
Steve Johnson  
Ellen Vollmer-Hodges  
Redfeather Ranger District  
1311 S. College  
Ft. Collins, CO 80524

May 27, 1997

Dear Paul, Steve, and Ellen,

The following are the comments of the Colorado Environmental Coalition (CEC) on the proposed Vista Morte, Stringtown, and Sevenmile Timber Sales and the Scoping Statements (SS) issued for these proposals. After section I, page numbers refer to the respective section of the SS.

#### I. COMMENTS COMMON TO ALL THREE PROPOSED SALES.

A. REDUCING STOCKING AND FUEL ACCUMULATIONS IN PONDEROSA STANDS. CEC agrees that some ponderosa stands become overstocked with fire suppression. Livestock grazing<sup>1</sup> contributes to this substantially, as cattle eat grass which would otherwise carry a low-intensity fire that would thin the stands and keep fuel levels low. CEC favors management that would return ponderosa stands to their natural stocking and fuel accumulation levels. Thinnings, followed by prescribed burning is the best method to do this. Fire is necessary to renew soil and to create conditions favorable to ponderosa pine regeneration.

B. RIPARIAN BUFFERS. Each section of the SS has the following statement:

“At least 80% of potential ground cover should be retained within 100 feet from the edges of...water bodies”.

This statement should be revised or deleted. It is critically important to protect all vegetation (other than noxious weeds) right on the edge of water bodies. Under the above statement, such vegetation could be removed (accidentally or otherwise) and still meet the standard. Note the following requirement from the Planning Regulations:

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<sup>1</sup> According to the SS, grazing is currently only active in the Vista Morte area. However, a vacant allotment covers at least part of the Stringtown area (SS Stringtown p. 3), and “there is the potential for grazing to occur in the northern part of the proposed [Sevenmile] activity area” (SS Sevenmile p. 3). No additional grazing should be authorized and the proposal to close the allotment affecting the Stringtown area should be finalized. This will prevent additional impacts to a variety of resources, including fuel build-up and overstocking.

“Special attention shall be given to land and vegetation for approximately 100 feet from the edges of all perennial streams, lakes, and other bodies of water. ... No management practices causing detrimental changes in water temperature or chemical composition, blockages of water courses, or deposits of sediment shall be permitted within these areas which seriously and adversely affect water conditions or fish habitat” (36 CFR 219.27[e]).

C. ENVIRONMENTAL DOCUMENTATION. Each section of the SS states:

“Unless scoping indicates extraordinary circumstances, this project may be categorically excluded from documentation in an...EIS or...EA”.

CEC feels strongly that an EA, at least, is mandatory for Vista Morte, as the proposed volume is one million board feet “on approximately 200 acres” (SS Vista Morte p. 1). An EA should also be done for Sevenmile, given the proximity of popular recreation areas and the Manhattan Townsite.

D. MISTLETOE TREATMENTS. All three sales propose to treat areas infected with dwarf mistletoe. Once mistletoe thoroughly infects a stand, it is difficult to get rid of, except by a very large clearcut or fire. Cutting just part of a stand subjects the subsequent regeneration to infection by the remaining overstory. However, removal of sufficient numbers of trees to nearly eliminate mistletoe would do more damage than the disease by destroying important wildlife habitat, including: trees for nesting birds and blocks of closed-canopy (or nearly so) forest for “interior” species. It could also cause serious soil erosion, as all three project areas have considerable areas of steep slopes (see SS maps).

Dwarf mistletoe is a natural component of conifer forests. It provides considerable benefit to a variety of wildlife. See Bennetts et al, 1996<sup>2</sup>. Thus we recommend only limited treatment for this “disease”.

E. SNAGS AND DOWN DEAD. We find no mention of retaining snags in the SS. It is well known that snags are vitally important for a variety of wildlife species. Retention of more than the Forest Plan minimum number is desirable because in a natural forest, localized kills from root rots and small-area bark beetle epidemics would create areas with high numbers of snags. This would attract species such as three-toed woodpecker. It is especially important to provide snags in ponderosa pine stands, as loggers and firewood cutters frequently remove snags as soon as they appear.

Each section of the SS states that “[d]ead, blowdown timber would be salvaged...” to reduce fuel loading. Some removal of dead may be acceptable, but as with snags, it is important to leave sufficient down dead wood to provide for wildlife and soil renewal.

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<sup>2</sup> Bennetts, Robert E., et al, 1996. The Influence of Dwarf Mistletoe on Bird Communities in Colorado Ponderosa Pine Forests. Ecological Applications 6(3), 1996, pp. 899-909.

We recommend that all down logs currently touching the ground be left in place. These logs are probably at least partially rotten, and thus have no commercial value<sup>3</sup>. However, firewood gatherers may be able to utilize some of this material. However, if this option is chosen, careful supervision will be necessary to ensure that people do not remove wood that should be left on site.

F. ROADS. We are happy to see that no new road construction is necessary in any of the three proposed sales. All skid trails and temporary roads must be closed and obliterated after sale completion. Some existing roads should be also be obliterated, especially in the Vista Morte and Sevenmile areas.

G. SENSITIVE SPECIES. Per FSM 2672.43, there must be a thorough evaluation of each project on sensitive species of fish, wildlife, and plants.

II. SEVENMILE. SS p. 1 states that parts of the area have been harvested previously. Assuming these areas have regenerated, the new understory is probably already infected with mistletoe. This needs to be considered if any treatments area designed to reduce mistletoe. Rather than removing the overstory, the affected understory could be removed, now or sometime in the future.

One of the purposes of the sale is to "assist in the recruitment of old growth structural stages...". Other than for ponderosa pine (see section I A above), it is hard to imagine how cutting trees would assist old growth recruitment. Removing trees that could later become old growth would reduce the chances that the stand later becomes old growth.

We are pleased to see attention to the problem of cheat grass invading previously disturbed areas (p. 3). We agree that the current area of this species should be reduced and replaced with native species to the extent possible.

Any timber cutting and hauling must be designed and implemented to have the minimum adverse impact on recreation. Screening (p. 4) may be a good idea, but it may not be sufficient to shield popular areas from the noise of timber cutting.

III. STRINGTOWN. The support, or at least acquiescence, of the adjacent landowners should be obtained before this project is approved. Otherwise, the Forest Service will create resentment.

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<sup>3</sup> CEC questions the ability of the Forest Service to force any commercial operators to remove down dead wood. This probably could be made a provision of the contract, but the inclusion of such a provision would make any sale much less attractive to potential buyers.

Any old growth ponderosa pine should be maintained, as stated on p. 2, #5 under Wildlife. Again, thinning and burning are the best ways to do this. It is also important to maintain snags, which are often not present in managed or accessible ponderosa stands.

It is important to retain some big game hiding and thermal cover, as the area is deemed "important big game winter/transition range" (p. 2).

IV. **VISTA MORTE.** One of the reasons for this sale is to "complete prior silvicultural treatments..." (p. 1). We assume this means doing the final step (overstory removal) of previous shelterwood cuts. This is not desirable, as the area is "just west of the Kilpecker burn" (id.). Cutting in the Vista Morte area may cause too many openings in the canopy, to the detriment of forest interior species. We recommend only selective cutting, or perhaps small group shelterwood, for this area. No cutting should be done adjacent to the burn.

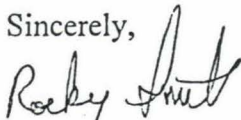
The SS (p. 2) identifies a "tunnel effect" along the Deadman Road, and notes an "opportunity to create a diversity of age classes within the road corridor" (id.). Retaining high forest cover along this road is probably desirable, as it is scenic and reduces the amount of snow drifting across the road. The SS further notes (p. 3) that "[t]here are some very important migration corridors crossing the Deadman Road. Cover along these corridors will need to be maintained and the timing of activities controlled". It is well known that elk tend to stay away from open roads, especially those without sufficient hiding cover along them. Thus any cutting along the road must be very limited.

The SS (p. 2) states that past cutting often left only narrow strips between harvest blocks and roads. Even if these leave strips have mistletoe and/or are experiencing windthrow, it may be desirable to leave them, as they may contain the only high forest cover in parts of the area. They may contribute to hiding and/or thermal cover for big game, and to any populations of tree-nesters still hanging on.

SS p. 4 notes that there is heavy recreation use in parts of the proposed sale area and refers to a "dispersed recreation management plan". What is this? In any case, any logging and hauling must be implemented to cause the least disruption to recreation.

We appreciate this opportunity to comment. Be sure to send us any draft and final environmental and decision documents for these projects. Send all material to the Denver address on the letterhead.

Sincerely,



Rocky Smith

Forest and Range Ecology Coordinator

**Jerry S. Dodd**

5884 South Hanover Way  
Greenwood Village, Colorado 80111-3734  
United States of America

Tel: (303)773-0882  
Fax: (303)721-9153

May 21, 1997

Stringtown Scoping  
Redfeather Ranger District  
1311 South College Avenue  
Fort Collins, CO 80524

Subject: Stringtown Vegetation Management Project

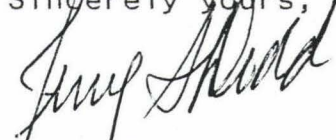
Dear Sir or Madam:

My wife and I as landowners in the project area and members of the Stringtown Gulch Road Association, Inc. support the aims of this USFS program and do not believe there are any extraordinary circumstances involved.

Our concerns are (1) that the beneficial provisions contained in the scoping statement be properly prescribed in the contract and that the USFS give close supervision the contract to assure compliance, and (2) that Pole Hill Road be to USFS standards for this class of road after the contract is completed. A suggestion is for the USFS to contact the President of the Stringtown Gulch Road Association, Inc. to discuss the placing of three to four culverts along Pole Hill Road between Buckhorn Road and the project area to improve trafficability during the contract operations.

We appreciate the opportunity to comment on this scoping statement.

Sincerely yours,



Jerry S. Dodd

cc: John Garnas, President SGRA  
Fred Castor

May 14, 1997

Stringtown Scoping  
Red Feather Ranger District  
1311 So. College Ave.  
Ft. Collins, Colorado 80524

ATTN: PAUL LANGOWSKI, PROJECT LEADER

Dear Mr. Langowski:

I am writing in general support of your proposed project on Stringtown Gulch Access Road.

From the map in packet of information, I can not determine exact boundary areas of project.

We have property in sections 34 and 35 and have quite a bit of Misseltoe in forest to the west of our property which should also be considered, if not at this time in original boundary.

We have long been working on the thinning and cleaning of our property so support these efforts greatly.

My only concerns involve the use and additional wear on the road access as well as protection of wildlife.

Please keep us informed of progress in project.

Sincerely,



John H. Rust  
1125 W. 6th  
Loveland, Colorado 80537 -5344  
970-669-4022

STRINGTOWN SCOPING  
REDFEATHER RANGER DISTRICT  
1311 SOUTH COLLEGE AVENUE  
FORT COLLINS, CO. 80525

GREETINGS;

This letter is to register my complete support for the proposed project to reduce stand densities, reduce fuel and treat disease infected stands in the designated area. My property is immediately adjacent to the Forest Service property and has consistently been infested with the dwarf mistletoe from the Forest Service. I would deeply appreciate having that area cleaned up completely once and for all. We have our property under a forest management program which is being directed by the Colorado State Forest Service and we are trying to care for the area.

I do not object to controlled burning as a tried and proven method of management which leads to new growth and reduction of fuel.

Please consider my support and appeal to put this neglected area under aggressive management.

Thanking you, I am

Sincerely,



Fred Castor