**Baldy Mountain Project Commentors Meeting 03/22/2021 1:00 pm**

Attendees: Niccole Mortenson, Clay Speas, Dana Gardunio, Luke Holguin, Robyn Cascade, Craig Grother, Ted Zukoski

Introductions were followed by a description of the Baldy Roadless Area Description:

… restoring characteristics of the ecosystem, restoring habitat, and 5 is incidental to habitat improvement. No temp road construction or reconstruction and fire lines greater than 50 inches wide are not anticipated in the roadless area. All treatments are non-commercial are mechanical or hand treatments that would leave fuels on the ground and they would be left or burned depending on the treatment area. Roadless area has had past mechanical or fire treatments in the past and that was considered as part of the roadless rule that this would have additional treatments in the future. April or May we had the Roadless Consultation with the FS Regional Office and got approval since we’re not doing road construction or commercial harvest was approved fairly quickly.

Ted thought this information was very helpful. Groups are sensitive of logging and road construction in roadless areas. Not the only project of this type going on in the state and that they are keeping an eye on. Some of these project reflect an attitude that roadless areas are pretty much the same as every other place when it comes to how they should be managed and that is not a philosophy the group agrees with. Helpful to hear about exceptions we’re proposing to use, helpful to understands firelines greater than 50 inches wide but some concern about…100 foot fire buffers? Concern with the length of the fireline and how much turf it would traverse.

| **Activity** | **Acres/Miles/Items** | | | | |
| --- | --- | --- | --- | --- | --- |
| **Forest Service** | **CO Roadless** | **BLM** | **Private** | **Total** |
| Rx Fire Acres | 1,075.8 | 869.8 | 525.6 | 661.8 | 2263.2 |
| Mechanical Acres | 606.9 | 128.4 | 347.6 | 1,289.5 | 2,244 |
| Mechanical Option | 77.6 | 59.7 | 1 | 419.4 | 498 |
| Hand Crew Acres | 487.6 | 450.9 | 252.4 | 85.8 | 825.8 |
| Buffer Rx Fire 100 Ft Acres | 101.3 | 75.5 | 84.2 | 88.1 | 273.6 |
| Temporary Access Miles | 0.92 | 0 | 0.90 | 0.00 | 1.82 |
| Water Development Items | 0 | 0 | 0 | 1 | 1 |
| **Total Acres** | **2,349.2** | **1,584.3** | **1,210.8** | **2,544.6** | **6,104.6** |

I did a GIS exercise after the meeting and determined there is 7.7 miles of fireline within the roadless area. Approximately 5 of those miles are not associated with an existing trail.

Robyn had estimated that 4.5 miles were not associated with existing trails measuring with string. She is happy to hear that fireline would be 50 inches wide and not 100 feet. Some of great old broads concern with coalition with community conservation proposal they are proposing RA in Unc wilderness as part of the forest plan revision. Want to be sure we are maintaining wilderness characteristics and not introducing weeds and not encouraging rec users to use fireline recreationally. I mentioned that it is a concern of ours as well not to encourage unauthorized rec use and create more trails. Niccole mentioned we may not need to create firelines along all of the 5 miles but use openings and topography to reduce the need.

I mentioned that Craig had commented to use topography and natural fuel breaks to reduce need for fireline. I mentioned that is a desire of ours to and the diverse topography lends itself to this possibility. For example burning south facing slopes while north face is wet and holding snow.

Craig asked what time of year we’re planning to burn. I mentioned that we haven’t planned the particulars of implementation but that it would likely be a combination of spring and fall burning but have also discussed the possibility of burning it all at once. Niccole had asked if CPW made recommendations to burn in spring. I concurred and mentioned that implementation in concert is something we have also discussed with treating fuels mechanically before burning to reduce the need for fireline.

Other impact from Robyn is that she does know any kind of mechanical treatment needs significant machinery and some access and definitely impacts the vegetation but also soil and soil compaction. In terms of roadless area; GOB is not concerned with areas outside of roadless. How you preserve or enhance when we are using motorized machinery and need access. I mentioned that what really makes this project possible is the private landowners, the Mullins, I explained they initiated the project wanting to burn on their private property and the project has grown from there. Having the access from their property eliminates the need to create any roads. There is the one improve access activity identified in the proposal but that is outside roadless on an existing two track. The improve access entails widening the two track at approximately 3 locations totaling approximately 60 feet to allow machinery access to lower bench f8/m8. This route originates on the mullins ranch and is not accessible by the general public. No other access needs to the public. No other need for roads or trails to allow machinery. Robyn also asked if this was true of m5 and I said yes that a piece of machinery can travel cross country.

Robyn asked what the potential impact to soil and vegetation from treating in roadless mechanically. She hopes we won’t use mechanical treatment in the optional areas and that we’ll stick to hand tools. We have contract specs to eliminate impacts to soil when using machinery like operating when the soil is dry. As long as the vegetation the treated fuels would be left on site and rx fire would clean up existing fuels. Niccole mentions that looking at soils section for unit m5 is moderately sloping 10-25% pretty low on erosion side. Thickets of shrubs on understory and some aspen. Pretty well developed soils and low compaction risk. So long as we’re not making a hundred passes we’re pretty low on the compaction risk. I added in that particular unit the goal of the mastication would be to reduce fuels around these stands of savannah type oak that is prett unique on the forest so that rx fire lit under the right conditions would not impact those stands significantly to reduce impacts to these stands of savannah oak reducing the possibility of a crown fire.

Craig has a question about community fire plan that was mentioned. Are these areas within the project and what exactly is threatened. Niccole states that piedmont and ponderosa communities are high fire rating and idle wild is moderate to high fire rating. What fire plan recommends within and around the community includes thinning mechanically or by hand to make them more resilient to fire. Impacting private and extanding 1.5 miles from the boundary of the protection zone. Craig asks if this is the ranch? These are the CWPP areas identified in the Ouray County Plan. North end of unit m5 is the only area not within WUI identified as 1.5 miles from CWPP areas and a 1.5 mile buffer with condition class three fuels. Craig feels that if it is open ranch land he doesn’t see much of a case for WUI in his opinion. Dana says that it is the Ouray County wildfire protection plan.

Robyn doesn’t want to beat a dead horse but wants to go back to wilderness character. Is this project as proposed right now going to impact wilderness characteristics that our proposal that the community conservation proposal will no longer be suitable or eligible for wilderness addition? Niccole mentions it should not impact wilderness character because there won’t be addition of roads won’t be affecting opportunities for solitude assuming that already exists. Robyn’s conversation with Sam Staley used gis data and google earth and other docs we had eliminated anything that had treatment within the last 100 years. GOB pushed back on this and said so long as it is not evident and if we are talking about repeated treatments overtime it would be evident. Niccole asked me about past treatments if it was in 2003 and Craig recalls it being earlier than that in the 1990s; all spring burning using helicopters with no firelines using natural barriers and that is why he suggested this. Craig feels there should be an alternative using natural barriers, snow banks, cliff bands, changes in vegetation etc… it will be hard to contain anything in the fall because it’s so steep and dry. BCH is not concerned about vegetation treatments but are concerned about roadless character and potential eligibility for wilderness if it goes that way. Craig hasn’t done wilderness evaluations but if repeated treatments remove it from eligibility it seems like it could preclude it’s eligibility. Dana asks if she is concerned about fuel breaks or just the fact that it has been treated to Robyn. Robyn again is basing it off of conversations with Sam Staley Robyn feels like we need to have this sort of care for these values to protect them… the conservation proposal 2,000 plus acres is being proposed. Robyn needs some guarantee that everything they have worked for in the last three years around this proposal is not being undermined by this project. What she would ask and love to see an alternative that does not include mechanical treatment in the roadless area and limits the size of F9. She recognizes the southern portion of f9 is thick with oak and she recognizes the need to treat this. There north end is grasslands and no accumulated fuels on the ground and so she questions the need for the size of F9. Dana mentions to first comment about treatments she will circle back with Sam as she wasn’t aware of that conversation as far as the size she hands it back to me how we developed that unit. We wanted to include that area and not to tie our hands and include the area previously treated with prescribed fire and to give us some flexibility while we are implementing. Robyn asks if the goal is fuels reduction is there any reason to burn grasslands? I mention that not particularly there could be benefits to burning these grasslands to reset them and resprout them but as far as reducing oak and treating those fuels it’s not as necessary to treat the grassland areas. Robyn asks as far as wildlife enhancement talk to us about which species or what benefit to having that large of an area. As you move south from the north around the BLM piece of ground the focus shifts from elk to bighorn habitat. Part of our planning was that we didn’t want to treat a small area that elk would likely take over and looking at the larger area and the opportunity to treat more acres would reduce competition amongst wildlife species. Robyn’s goal is to align with our habitat objectives and reduce impacts to. Robyn mentioned that I mentioned there may not be treatments in the northern part of f9 which she would be supportive of if at all possible especially if that meant not having to put 50 inch line in there. I mentioned the benches in the southern area could provide good bighorn sheep winter habitat but right now is low quality and choked with oak brush. Outside of treatment for the WUI resources as you move south and on the western flank focus is on bighorn sheep habitat.

Ted to follow up on some of the roadless issues. First we understand this would go direct to a final EA. Niccole says correct. Ted says not their favorite way to do these things especially when they don’t have the information about which exceptions will be used in the roadless rule and he understands that the Regional Office is directing staff in Colorado that we let the public know what the nature of the exception being proposed. He would appreciate seeing that in future scoping notices. Robyn alluded to this that if we are going to have projects in roadless areas if we could look at an alternative that does not have mechanical treatments in roadless so it helps them understand why we need to do mechanical treatments in roadless areas. Helps them understand having them in roadless and not having them in roadless so he can understand why they are so necessary. Dana asks for clarification that if we are not looking at new roads or temp roads the concern is really having any sort of equipment including chainsaws. Ted says that it goes back to Robyn’s comment about not impacting potential wilderness character and it would be great to have that in black and white that it would not have negative impacts on roadless character then we could all breathe a heavy sigh of relieve and move on. It would be good to have that disclosure in the NEPA document. Dana says concern is two fold bringing equipment in and reducing wilderness character. Robyn says these are the biggies and also the expansion for noxious weeds. Craig agrees with that too. Craig says expanding trail systems and utilizing firelines as trails. Dana says that beyond fuel break that there are not concerns with prescribed fire in roadless. Robyn states that depends on the conversation you have with Sam. It could look natural using prescribed fire so maybe wouldn’t impact. Also notion of treatments over multiple years. Robyn mentions scoping letter talks about restoring firelines and that if we are using them repeatedly they will continue to be impacted and if we don’t restore them they will be scars on the landscape. Dana says we haven’t talked much about weeds but there are things we could do to address weeds including monitoring. Robyn states there are weed seed sources including cheat grass and foxtail barley and probably Canada thistle.

Robyn asks is there a possibility we would see an alternative that did not include treatment in roadless? Niccole states that it is possible but that it is a line officer call. Dana mentions that we are in the specialist report phase and hasn’t been fully briefed on where we are with alternative analysis but will have that discussion with IDT to see where we stand. Craig says an alternative that omits that is one thing but what about excluding the heavy part of it and just using fire and Robyn mentions that she would support this for sure. Dana says one thing we have talked about is that a lot of these areas need pretreatment before we put fire on the ground and that we would like to use prescribed fire as much as we can for multiple reasons including cost, a lot of the units that we added in mechanical component because we really need to. We have tried to go fairly light where we have looked at those options. Knowing the limitations of burn windows we are trying to strike that balance between giving ourselves flexibility on implementation side as well. It is worth going back and taking back a second look and maybe we can clarify that this is the main objective. I asked Robyn about hand crews with chainsaws and using them in roadless is this a concern vs using mechanical are there concerns with the hand crews. Not so much concern with handcrews assuming that it is people walking onto the landscape and using saws and you’re not leaving any tracks other than human footprints that would seem reasonable and would defer to Craig. If we could stay away from mechanical and use the hand option with fire. She does understand the need to do some preparation before fire. Niccole shows photo of unit m5 and there are a lot of continuous fuels that fire would have a long way to go unless you do some sort of treatment prior to fire. Robyn agrees that this is true and in F9 as well. I confirm with Robyn that she is talking about the area south of Crooked tree gulch south to the next drainage (Cutler or Dexter Creek?) Robyn adds that when you start up on the Baldy trail the first section before and after the section with storm gulch the oak is quite thick in there all the way to the west.

Ted mentions comment about the 100 foot wide fireline or 100 foot buffer can we clarify what that is and what it is about he would appreciate it. I spoke to that and said that it would be a 100 foot buffer void of vegetation and possibly interpreted that it would be a 100 foot buffer down to mineral soil. It will be neither of these. The 100 foot buffer came from the development of this project around burn only units. Fuels specialist wanted to see this that we could come in and reduce fuels within 100 feet of control line. One of the design features we have is not to create straight lines void of vegetation but to feather in these treatments to reduce vegetation adjacent to fire line mechanically or hand crew treated to reduce those fuels. Robyn mentions it seems like there are some inconsistencies there. Niccole said at beginning fireline would only be 50 inches. I mention fireline 50 inches is down to mineral soil. The buffer is 100 feet from this line that the fuels would be reduced mechanically or by hand crew. Robyn confirms that we are saying there will be a 100 foot buffer? To her this is pretty significant in something that we are proposing for wilderness. I mention that the goal is not to create straight lines so they are not as noticeable but that the fuel loading along them is reduced. It may not be in every area where fuels are already light but would be an area where fuels are reduced. I mention that it is a goal not to create lines and corridors where there is no vegetation but only to help contain prescribed fire. Robyn clarifies that it is not the 50 inches but rather the 100 feet? I say that it is both true 50 inches to mineral soil and reduced vegetation within 100 feet along those lines. Robyn says that this would be the clincher in Dana’s conversation with Sam Staley. Robyn is not sure how much fuel would be reduced in these areas but that it could be significant and a scar on the landscape; if she is concerned with the unnaturalness with the concern for eligibility that would be a red flag.

Robyn mentions we are coming on an hour and asks Craig and Ted if there is anything else before we move to public process. Robyn wants clarification. Scoping letter it was clear that there was opportunity to comment for scoping then there would be a final EA to public and the only further action would be protest. And that only if you commented could you protest. It is certainly in the letter of the law with compliance but the hope in terms of community engagement that they would so very much have the opportunity to comment on a draft EA. Is there a possibility of that? Niccole says that it is a possibility but unlikely. Because a lot of the implementation is being done in more of the community approach. So we get to implementation there would be public participation we could do with help in lay stuff out on the ground or concerns at that time or the burn plans or stuff like that. We weren’t planning to do an additional comment period because we don’t think the comments would be any different than they are right now. So Niccole says that we think we know what the issues are and that is why we wanted to followup with you too to make sure we had them right before we move to final document. Keep in mind there are more things you can do after the draft decision and final EA to be involved as part of the community. Robyn asks is there public notice on those other processes during implementation? Niccole confirms with us that we will hold these and invite folks to come out and look at stuff. Dana mentions yes we talked about once we get through the NEPA process and that with the collaborative nature of this we’re trying to move this giant hurdle forward really slowly with all the mixed ownership and multiple partners and agencies they have already been reaching out to town and community council and some of the property owners but it is her plan moving forward is keeping interested parties in the community in lockstep with what we are doing and that most of the comments are geared more toward details of burn plan and timing and lack of familiarity of folks with prescribed fire and what that looks like. Dana see’s more opportunities to educate and bring people along for components of the project. Some of the other comments didn’t have level of detail to make more informed comments. That is her goal for the project is that she doesn’t want to release the NEPA and go into a closet where people aren’t sure what’s going on. Robyn thanks her for that and gives kudos to us all on the collaborative process and appreciate that we can do this kind of acreage with the connections we have made. Dana mentions that it no good deed goes unpunished and it has been a lot of meetings a lot of talking to folks but is all worth it.

Robyn mentions it may be outside of the scope of this conversation but part of what her group has been doing is elevating the voices of indigenous people and she has learned is the significant expertise amongst tribal members with fire. She would love to throw it out for the sovereign nations to work together. Tribes have fire keepers who has worked the land for a very long time. It would be really interesting to have an engaging conversation to talk about the prospect and co-management when it comes to fire. In this project or with other projects.

Robyn thanks us and appreciates our time and reaching out to us. It helps Dana understand a little better hearing it in conversation. Robyn asked NEP completion goal is spring 2021 or 2022 and Dana confirmed spring of 2021 is our timeframe for completion of the EA. Dana mentioned she doesn’t see implementation happening until next spring at the earliest. But perhaps some of the mechanical and pretreatment work could occur sooner.