



Dana Gardunio
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USDA Forest Service
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Via e-mail: comments-rocky-mountain-gmug@usda.gov

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Dear Ms. Gardunio,

Thank you for the opportunity to comment on the Scoping Letter (SL) of August 11, 2020 regarding the Baldy Landscape Resiliency and Habitat Improvement Project. I write as the volunteer leader of the local Northern San Juan (NSJ) chapter of Great Old Broads for Wilderness (Broads.) Our chapter represents over 400 supporters (including local businesses) across Delta, Montrose, Ouray, San Juan and San Miguel Counties with over 40% of us residing in Ouray County. Baldy Trail and the destination of Baldy Mountain are popular among our members who are knowledgeable about the landscape. We write from that experience.

Great Old Broads for Wilderness is a national organization, led by women, that inspires and engages activism to protect wilderness and wild lands. We place a particular emphasis on maintaining expansive landscapes for wildlife habitat and corridors as well as attention to ecosystem integrity and resilience in the face of increasing recreation demands, growing populations, and climate uncertainty including but not limited to drought, less snowpack and wildfires. Therefore we are pleased to see an effort to restore fire to the landscape to reduce fuels and improve wildlife habitat. Nevertheless, we have some serious concerns about both the process and the content of this proposal. Pertaining to the latter, our comments focus on the Baldy Roadless Area. We appreciate your consideration of our comments.

CONCERN: Limited Opportunity for Public Involvement. First, and very important to our membership, is the lack of public involvement in this process. Though your proposed process is within the legal requirements of NEPA, providing the public with a 30-day comment period on a scoping letter (that lacks significant detail) with no opportunity to review and comment on a draft EA, is woefully inadequate if you truly desire public input. Our only option following this scoping period is to object to a final EA without ever having seen the draft EA. This “streamline” process, which is becoming increasingly

common, though legal, does not agree with the intent of the law to engage the public at several stages of the process.

Furthermore, representatives of our organization along with several other conservation groups met with the USFS Region 2 Acting Regional Forester and Deputy Regional Forester to discuss inconsistencies and, in some cases, insufficient information regarding proposed projects within Roadless Areas (RA.) At that time, Region 2 staff committed to preparing guidance and a template to set clear expectations for districts and forests communicating to the public about projects with RA impacts.

Finally, though the announcement for this project was printed in the *Montrose Daily Press*, there is no record of any publication in the *Ouray Plaindealer*, which is the official newspaper of the Town of Ridgway, the City of Ouray and Ouray County – the latter being the very location where this project is proposed.

RECOMMENDATION: Given the three statements above, we request that the USFS release a draft EA and allow at least a 30-day comment period for the public to review and offer input. Second, we ask that the Ouray District take no further action on this project until you have received the guidance promised by the Region 2 office. Finally, any further announcements re: this project must appear in the *Ouray Plaindealer* as well as the *Montrose Daily Press*.

CONCERN: Deleterious Impacts to Baldy Roadless Area. As you may recall, a coalition of organizations developed and submitted the Community Conservation Proposal to the GMUG Forest for consideration in the GMUG Forest Plan revision. One component of that proposal (that our NSJ Broads worked diligently on) was to recommend the Baldy RA as an addition to the Uncompahgre Wilderness. (See attached narrative and map.) There is extensive local support for this wilderness addition from diverse stakeholders including ranchers, elected officials, businesses, and recreation users including hikers, hunters, equestrians and wildlife enthusiasts. (See attached documentation.) Therefore we oppose any mechanical treatments in the Baldy RA due to their deleterious impacts to vegetation, soils and scenic values along with the need for greater access that scars and fragments the landscape. Hand crews could achieve the same purpose and we acknowledge this approach would increase the expense, time and labor required. Nevertheless protecting RA and wilderness characteristics is worth the added effort.

Though your SL references the Colorado Roadless Rule and claims this proposal is “consistent with” its requirements, there is no mention of the need for exceptions to the rule related to tree removal or proximity to communities or water supplies.

36 CFR part 294 states in the preamble :

“A need exists to provide for the conservation and management of roadless area characteristics. The Department (of Agriculture,) the Forest Service and the State of Colorado recognize that timber cutting, sale or removal and road

construction/reconstruction have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area characteristics. Therefore, there is a need to generally prohibit these activities in roadless areas. A need exists to accommodate state-specific situations and concerns in Colorado's roadless areas. These include the following: Reducing the risk of wildfire to communities and municipal water supply systems.” (Federal Register, Vol. 77, No. 128, p.39576)

The Baldy RA is not proximal to or adjacent to any community-at-risk of fire nor to any municipal water source or supply system. Though there may be at least one structure on private land to the north (and possibly west) of the northern section of the RA, such structures are not close enough to the RA to warrant prescribed fire in the RA for protection of these structures nor do such structures qualify as at-risk-communities.

Using the scale on your map, it appears that over 6 miles of 100-foot fire buffer will be constructed in the RA – approximately 5.5 miles along the perimeter of F9 and an additional approximately 0.75 miles for F3. The scoping letter states that the majority of fire lines will coincide with existing roads or trails. However, when comparing the hiking map with the proposal project map, it appears only 1.5 miles of F9's fire buffer is along the Baldy Trail and a mere 0.3 miles along Storm's Gulch Trail indicating that nearly 4.5 miles of 100-foot wide buffer, some of which will be down to mineral soil, will cut across the Baldy RA. One hundred feet is much wider than most if not all roads on the GMUG Forest and therefore, it could be argued that the fire buffer constitutes a considerable impact in the RA. Such a fire line has a high probability of impacting roadless and wilderness characteristics especially naturalness. Certainly primitive recreation and scenic values will be diminished. Moreover, there is much discussion of trails and roads fragmenting wildlife habitat as recreation pressures increase across Colorado. What is the impact of such fire buffers created with machinery like bulldozers (and the access routes built on the landscape in order to construct such buffers) on habitat integrity and roadless characteristics? In the SL, reference is made to the possible need to treat areas repeatedly and perhaps even over several years. Does this mean any fire buffers would remain on the landscape even though the project calls for rehabilitation and reseeding them after the prescribed burns? Furthermore ground disturbance significantly increases the probability of establishment of and/or proliferation of noxious weeds. Note: Hiking Baldy Trail on August 31, 2020 revealed Foxtail barley (*Hordeum jubatum*,) Canada thistle (*Cirsium arvense*) and Cheatgrass (*Bromus tectorum*) beginning at (or below) an elevation of approximately 9030 feet and present along the trail at least until the ridgeline. (See CMC RIMS data 8/31/20.)

RECOMMENDATION: Maintain or enhance RA characteristics and wilderness characteristics in the Baldy RA. Certainly do not negatively impact these existing conditions. Therefore we strongly urge the use of hand crews for any treatments in the Baldy RA and oppose any mechanical treatments (as proposed in M5 and as an option in F3.) Thank you for proposing hand crew treatments in H3 and H4. A thorough analysis must be conducted related to the need for prescribed fire and mechanical treatment in any part of the RA and it must specifically address the proposed need for the fire buffer – both its length and width – in the RA. Impacts on roadless characteristics from proposed treatment and fire buffers must be identified and analyzed

in the EA. EA must fully disclose if and how the proposed project will affect wilderness character in the RA.

Furthermore, the USFS should consider the use of natural buffers including but not limited to use of snowpack and wet areas in springtime, the rock cliffs that exist within F9 (see photo) and borders of vegetation types less conducive to burning especially in spring. Use of such natural barriers and topographical features, coupled with timing the burns to coincide with lingering snowpack and wet conditions in springtime, could eliminate the need for such extensive fire buffers that will cause unnecessary disturbance to soils, vegetation, habitat connectivity and recreation. Aerial ignition should be analyzed as an option to minimize ground disturbance. The EA must include an alternative with no mechanical treatment and no 100-foot fire lines in the RA. If such a protocol is deemed infeasible, then the USFS must consider an alternative with no treatment in the RA and another alternative with greatly reduced acreage of treatment in the RA. Thank you for acknowledging the need to treat for weeds prior to and following the proposed project.



Consider use of natural barriers for firebreaks such as this cliff visible from the Baldy Trail at approximately 9350 feet in elevation.

CONCERN: F9 is too large and too steep an area for prescribed fire and does not warrant fire treatment in its entirety. F9 is the largest proposed area for prescribed fire in the project proposal and all but a small area in the S/SE corner lies within the RA. Indeed the lower elevations are thick with gambel oak where wildlife habitat and fire mitigation could be improved with some treatment. However higher elevations of mixed grass, aspen and conifer may not require fire treatment across the entire area but rather prescribed fire could be concentrated in areas with significant fuel loading such as the patches of dead and fallen Douglas Fir and aspen along the ridgeline adjacent to the Baldy Trail.

Baldy Trail at approximately 10,100ft where targeted prescribed fires could be utilized to reduce ground fuel rather than burning the expansive landscape.



Large areas at higher elevation, where vegetation is limited, absent or not continuous, do not exhibit hazardous fuels and have not experienced increased fuel loading due to a history of fire suppression. Therefore, these higher elevations perhaps do not warrant burning.



View from Baldy Trail at 9585-foot elevation into F9: compass bearing 45 degrees.



View from Baldy Trail at 10,180-foot elevation: compass bearing 190 degrees

Furthermore the east-facing slope in F9 is quite steep and fire could result in significant erosion. There is also risk to personnel safety as well as the possibility of the fire getting out of control on such steep and rugged terrain.



Steep terrain in F9 as viewed from Storm's Gulch Trail. Note cliff in right photo that could serve as a natural barrier if proposal excluded prescribed burn from the higher elevations.

Finally, given the proximity of F9's eastern boundary to the existing Uncompahgre Wilderness, care must be taken to strictly control any prescribed fire and minimize any potential impacts in Wilderness.

RECOMMENDATION: Re-evaluate the size and extent of F9, and what treatments might be implemented there. Remove from the proposal any acreage above tree line that does not warrant treatment and concentrate any treatment in higher elevations on isolated wooded areas that exhibit excessive fuel loading. Leave live trees as well as some dead snags while focusing on eliminating excessive ground fuels. Also remove from the proposal any steep slopes with limited vegetation that do not exhibit excessive fuel loading. Conduct a cost-benefit analysis of prescribed fire on these steep slopes taking into consideration human safety, ability to control the fire, likelihood of significant soil disturbance and erosion, impact on water quality, proximity to Wilderness boundary, etc.

CONCERN: Insufficient, missing or conflicting information that limits the public's ability to effectively comment on this proposal. There are many questions that remain unanswered and many aspects of this proposal that are not described adequately to evaluate this proposal. Though this list is not exhaustive, the proposal lacks the following:

- Reference to the Colorado Roadless Rule exceptions that might apply to tree removal in the Baldy RA

- Specific desired outcomes for each treatment area in relation to wildlife, domestic grazing and fuel reduction. Though the SL mentions general goals, it lacks specificity and justification for treatment.
- Justified need for treatment in the higher elevations especially in F9, which have not seen accumulation of fuels due to fire suppression.
- Defined plan if desired outcomes are not attained
- Identification of which wildlife species (and what habitats) will benefit from each treatment area and how they will benefit
- Clear description of methods proposed to create fire buffers and how such buffers will be accessed by machinery. How will ground disturbance be minimized? What will happen to these fire lines if repeated treatments are required over several seasons or multiple years?
- Justified need for treatment in the higher elevations especially in F9 which have not seen unnatural accumulation of fuels due to fire suppression
- Clarification regarding conflicting text in SL (proposed action vs. project design features) whether a 100-foot width or no greater than 50 inches will be cleared to bare mineral soil for the fire buffer.
- Indication of time of year this project might be implemented
- Precautions proposed to avoid runaway fire on very steep slopes - including potential crown fires and impact to adjacent Wilderness
- Impacts on recreation
- Clearly marked trails and “old roads” on the project map. Though one road across USFS and BLM land is identified for improvement, no access to F9 is indicated. Including this information in the text of the EA is also recommended.
- Location of any new roads/access routes.

RECOMMENDATION: Given the plethora of missing or inadequate information detailed above, it seems reasonable that the USFS would release a draft EA for public comment that includes responses to concerns about insufficient detail in the SL.

Respectfully,

Robyn Cascade, Leader
Northern San Juan chapter/Ouray County
Great Old Broads for Wilderness