



*La Plata County*  
Colorado

Board of County Commissioners

Clyde Church, Chair • Gwen Lachelt, Vice Chair • Julie Westendorff, Commissioner

1101 East 2nd Ave  
Durango, CO 81301  
(970) 382-6219

US Forest Service  
Columbine Ranger District  
Attn: James Simino  
PO Box 439  
Bayfield, Colorado 81122

October 13, 2020

RE: USFS S HD's Landscape Restoration Project

Dear Mr. Simino:

La Plata County appreciates the opportunity to provide comments during scoping for the US Forest Service (USFS) Southern HD's Restoration project on lands within La Plata County. The proposed project is 34,000 acres of National Forest lands located east and southeast of Bayfield, Colorado. This area includes Spring Creek, Ignacio Canyon Fosset Gulch, Goose Creek and Saul's Creek within La Plata County.

This project includes forest restoration caused from fire suppression over the last hundred years that resulted in dense vegetation undergrowth and will create better wildlife and livestock habitat while reducing forest fire fuels. Methods for restoration are proposed with prescribed burning, tree thinning, public wood sales, mowing, or targeted livestock grazing. This project would include transforming a fire control line for motorized recreation such as OHV use.

La Plata County would like to make the following comments:

- The HD's are a sanctuary for many wildlife species including deer and elk and this project may temporarily displace many of these species by increasing human and wildlife interactions. Depending on timing and seasonal conditions, depleted herds may experience extenuating circumstances including failed reproduction, rearing or even death. La Plata County encourages coordination with Colorado Parks and Wildlife.
- A project of this magnitude has broad impacts on many species of birds and seasonal restrictions and clearance surveys should be considered to insure adequate protection for seasonally sensitive species.
- Use of OHV's in sensitive habitats may degrade habitats and impact sensitive flora and faunal.
- Careful seasonal and area planning must be considered to provide an opportunity for an area to recover once a unit is cleared. Constant human activity in the cleared area may cause continued long term avoidance by wildlife.
- A wide spread effort to control the infestation of noxious weeds needs in cleared areas should be included as part of this program. As forest health and restoration is the goal, noxious weeds should be treated simultaneously during cutting and burning operations. Continued monitoring and future treatments should be included to ensure successful treatment of

noxious and invasive species and compliance with the goals of La Plata County's noxious weed program.

- Habitat evaluations should be identified prior to any cutting activity ensuring some protective cover habitat remains following to ensure wildlife can utilize the habitat during the regeneration phase.
- Raptor and nesting bird surveys, big game seasonal closures and protections, rangeland assessments, recreational activity and utilization surveys and others should be addressed prior to execution.
- Cumulative impacts should be analyzed in association with the various other cut and burn programs in the region. The County has commented on various other scoping efforts not a part of this analysis and would like to see the cumulative impacts.
- Public outreach is key to ensuring public awareness and safety are addressed. Early coordination with our Office of Emergency Management about prescribed burns will allow the County to help inform the public about various project activities.
- Grazing domestic livestock with wildlife can put wildlife at risk of pneumonia-causing bacterium *Mycoplasma Ovipneumoniae* (bighorn v. domestic sheep example). Ensure analysis is thorough prior to implementation.
- Impacts to County Roads from increased traffic and heavy wheel loads should be analyzed.
- Is the creation of another OHV trail on a fire line justified in this area? Fire lines cut as a preventative measure and do not account for future human utilization or impacts to specific habitats. If a trail is necessary then the NEPA process should be considered and the trail planned with the full analysis as identified by an interdisciplinary team.

La Plata County appreciates this opportunity to participate and comment during this scoping period. We recognize the importance of what USFS is trying to accomplish with forest health and restoration.

Sincerely,

LA PLATA COUNTY  
BOARD OF COUNTY COMMISSIONERS



Clyde Church  
Chair

Gwen Lachelt  
Vice Chair



Julie Westendorff  
Commissioner