

hand delivered to CRD 9-17-21

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Southern HDs EA Comments
Columbine Ranger District
P.O. Box 439
367 Pearl Street
Bayfield, CO 81122

Comments Regarding: Southern HDs EA for Project 58742

Dear Sir:

As landowners in La Plata County and more specifically [REDACTED]

[REDACTED] we are vitally interested and supportive of wildfire mitigation in the HD Mountains.

The Draft EA prepared for the HD Restoration Project 58742 is well done and seems to be appropriate in several ways. The EA has succeeded in defining both the extent of the need for the mitigation and the complexity of the project based on the varied ecosystems present and the variations in topography. The science behind the mitigation techniques is well explained and therefore supportive of the proposed actions. The information provided in the EA is also an important insight building information source that allows residents to better understand mitigation techniques as well as their specific application to the HD Mountains.

That being said, we would like to make several comments and observations about the future implementation of the proposal. Our comments fall into three categories. One topic is maximizing alternative utilization of products resulting from fuel reduction techniques as opposed to burning them. The second topic is related and involves minimization of smoke produced by prescribed burns and the impacts from that smoke on nearby residents. The third topic is a request for clarification of future consideration of an OHV trail designation.

The cover letter dated August 16, 2021 advising the public of the draft EA had a confusing reference on the first page regarding the dropping of a motorized OHV trail from Spring Creek to Saul's Creek. To the best of our knowledge, there was never a proposal to connect the Spring Creek Road with Saul's Creek via an OHV trail. Perhaps this is a typographical error. It is limited to the letter and is not contained in the EA.

We were very pleased to read on page 14 of the draft EA that the proposed motorized OHV trail connecting Ute Creek Trail and Saul's Creek was dismissed from consideration. The deletion of the proposed trail from project maps supports the text.

The concern we have is that the statement "dismissed from consideration" does not necessarily imply dismissed as a possibility.

Our request for clarification comes from the wording in the justification for dismissal. The EA references the need for extensive field survey, and analysis to develop a suitable, if possible, alignment for consideration of a future trail. The question we have is what would motivate the allocation of future resources to do so. The wording in the draft EA does not clearly separate a future consideration of an OHV trail from the current EA.

Due to the potential for many harmful environmental impacts from such a trail and the stated complexity of a suitable trail alignment, it would seem that a completely independent EA would be appropriate for an issue of this significance.

Our concern is that the current wording in the draft EA would appear to allow the OHV trail issue to be re-opened in the future as a dormant feature of the existing EA. The current draft EA does not mandate new scoping, attendant EA, and public comment.

The following comments are not in opposition to the proposal mitigation procedures described in the draft EA, but rather are presented in an effort to encourage alternatives to prescribed burning and better explain the potential impacts of such burns.

These comments focus on four of the objectives presented in the **Background and Need** section of the cover letter for the comment period. Specifically:

- Reduce risk to life...
- Decrease financial cost...
- Provide wood products...
- Improve forage production...

We would first like to encourage the maximum utilization of wood products derived from fuel reduction procedures as an alternative to burning them via prescribed burns. There are several potential benefits from such an approach. Minimizing burning has many desirable benefits that will be explored in later paragraphs.

Making the maximum percentage of such products available to commercial and private uses obviously is the first choice for reducing the fuel load in the HDs. We understand that access to remove them is a matter of considerable concern. In some cases such as the Roadless Area, this may be a controlling factor.

A cost to benefit analysis for other areas might reveal that contracted extraction to public access points may ultimately be a better true cost choice than burning in place.

Public access for fuel wood retrieval has worked well, based on limited access periods and off road distance limits.

The southern section of the HDs is typically very dry and especially so in the current drought conditions. In such conditions, prescribed burns involve an increased risk. We have observed two aspects of prescribed burns that have relevance to this issue.

The first is that limb and debris piles, once allowed to dry thoroughly, and subsequently burned, have two advantages over distributed ground level sheet burns. The first is that they burn localized, hot and fast, and produce minimum smoke. As such they are more easily contained and controlled. The reduced smoke represents less impact on residents.

The second aspect of this issue that has not been adequately articulated is the tradeoff between burning ground level fuel loads and their value as moisture retention mulch layers.

If we understand the EA correctly, ground level fuel loads do not contribute to flame lengths above four feet assuming that ladder fuels above them are removed. Flame propagation through ground layers is relatively easily prevented by narrow fire lines scraped to mineral soil since the ground level fuel thickness is usually shallow.

Would it be possible in appropriate situations to chip or mulch ladder fuels in place and allow them to compact naturally as a cost effective alternative to burning in place.

Burning of ground level fuel loads has two undesirable effects. The first is that it leaves barren soil that is susceptible to sheet wash runoff and erosion instead of moisture retention. The second is that such burns produce large amounts of smoke and smolder for extended periods.

Prescribed burns are a matter of considerable concern for residents in and along the HD Mountains. Although we understand both the potential value of such burns, the negative impacts of such mitigation procedures are primarily focused on such nearby residents. The positive benefits are enjoyed by the county as a whole, and by the commercial and recreational utilization by various citizens of the U.S. Since the San Juan National Forest is in fact public lands, such utilization is a primary consideration in management of the forest and minimization of catastrophic wildfire. That is clearly understood.

The error in perspective that we have observed in the past is the argument that the greater good is achieved by causing very real greater harm to a limited number of individuals for the theoretical incremental benefit to a larger whole.

There are many examples of such tradeoffs. The shipping of radioactive waste from the east to disposal in New Mexico is a useful case in point. The argument presented is that in case of a spill or leak it is better to kill a few in NM than many in the more densely populated areas of the East, even though the waste is produced in the East.

Lack of adequate regulation for safe oil and gas development and production in the south central and south east sections of La Plata County is a closer case. Ultimately, revenue streams for the county were deemed more important than safety and public health considerations for residents located near wells and facilities and impacted by them.

The Draft EA presents a similar argument with regards to smoke production from prescribed burns. That argument is simplified to the following. It is far better to accept smoke production for limited periods of time derived from prescribed burns than to allow the tradeoff of far larger smoke production and damage from a catastrophic wildfire.

No one, including residents near the HDs could reasonably disagree with that argument. The problem is that such an argument is an oversimplification of the situation. In addition it reverts back to a decision made to sacrifice the few for supposed benefit for the many, using only one option to achieve the desired ultimate goal..

The issue is not whether fuel reduction to prevent catastrophic wildfire in the HDs is justified. There is no question that it is not only justified but very necessary. The question is how fuel reduction is achieved and to what degree prescribed burns are necessary as opposed to just being convenient or theoretically less costly.

Previous prescribed burns in the Saul's Creek, Beaver Meadows First Notch Road, and Fosset Gulch areas a few years ago provide useful insight in to what might be expected from future prescribed burns in the HDs.

Some portions of the Saul's Creek burn appeared to have burned more vigorously than desired or expected. That situation appears to be the result of incorrectly estimating the moisture content in the fuel load. Saul's Creek gets considerably more precipitation than much of the southern portion of the HDs. Prescribed burns in the southern section are at greater risk of loss of containment or controlled degree due to typically drier conditions and upslope canyon topography.

The smoke production from the Fosset Gulch burns and to a lesser degree First Notch were a significant problem for residents southwest of these areas for two reasons. The first reason was the nature of the topography and 24 hour wind patterns. The second was inappropriate monitoring of smoke density in affected areas.

In general, the prevailing winds are from the west during daytime hours. This wind direction reverses starting in early evening when higher elevation cooling drives denser cooler air down slope and down canyon. The nighttime prevailing airflow is from northeast to southwest. That flow is further channeled by the topography.

In the case of the Fosset Gulch prescribed burns, smoke was driven over Long and Trail Canyon into the mouth of the Armstrong Canyon complex where it accumulated, stagnated, and persisted. Eventually it spread out onto the flats for perhaps 2 miles. It remained relatively dense until mid-morning warming reversed the air flow and blew the smoke back east.

This cycle, although specific to our residence area and nearby, can be expected for any of the west outflow drainage or canyon areas along the west face of the HDs.

During the Saul's Creek, First Notch, and Fosset Gulch prescribed burns, smoke density monitoring was conducted in Bayfield. The results found the smoke and impact to Bayfield residents minimal. The reason was that the smoke from those burns dissipated some 1-2 miles east of Bayfield and did not reach the municipal boundaries.

The problem was that the smoke density at the end of CR 525 was not only unmonitored, but almost intolerable. Although the impact in Bayfield was minimal, that was certainly not the case for residents along the west edge of the HDs.

The impact on our health and well being as well as quality of life during those periods was severely negatively impacted. Our input was not solicited. We did not grant the right for someone else to make the decision for us to endure those impacts.

It would seem that the Restoration Project EA should contain a meaningful analysis of smoke production, its actual impact on residents, and propose an appropriate smoke monitoring system that is staged at relevant positions.


In summary, we would like to make the following comments, having said we support wildfire mitigation procedures for the HDs.

Physically remove as many products as possible from the restoration areas.
Investigate and consider alternatives to prescribed burns.
The goal is to reduce the fuel load. Prescribed burns are not a mandatory.
Balance the option of physical extraction versus the risk and impact of burns.
Stage smoke density monitors at appropriate locations to make meaningful evaluations of smoke density and actual impact on residents.
Understand that the impact of smoke from prescribed burns is on an individual basis, particularly for residents with respiratory issues.

Thank you for your consideration of these comments,



David L Honea



Jeanne L Williams