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May 2, 2022

Scott Fitzwilliams, Forest Supervisor
White River National Forest
900 Grand Avenue, PO Box 948
Glenwood Springs, CO 81601

Sent by electronic mail and uploaded to the public reading room

Re: ESWA's Scoping Comments on the Booth Creek Fuels Treatment Project

Dear Mr. Fitzwilliams:

The Eagle Summit Wilderness Alliance (ESWA) appreciates the opportunity to submit the following comments and concerns regarding the recent Notice of Proposed Action (Notice) concerning the Booth Creek Fuels Treatment Project (Project). ESWA is a local, all-volunteer nonprofit that works with the USFS to help protect, preserve, and maintain the Eagles Nest Wilderness and the other Wilderness Areas in Eagle and Summit Counties. Last year, ESWA's volunteers contributed over 5,000 hours of their time as Volunteer Wilderness Rangers, Trailhead Hosts, Sawyers, Trail Crew, and Weed Spotters in support of these Wilderness Areas.

Our General Comments and Specific Concerns are set forth below:

GENERAL COMMENTS:

Wildfire mitigation projects in and near Wilderness Areas raise complicated and competing issues. Each project must be judged on its own merits based on all the facts and circumstances. These competing factors include:

- a. Fire is a natural process necessary to maintain forest health.
- b. In the 20th Century, USFS policy was largely to suppress even naturally occurring fires on forest lands.

- c. Such suppression has resulted in the unnatural increase in fuel loads, leading to larger and more dangerous forest fires.
- d. Humans have increasingly built homes and other improvements in and near forests.
- e. This Wildland Urban Interface (WUI) is particularly susceptible to large destructive fires that risk human life and property.
- f. Wildfires should be allowed to burn whenever appropriate to try to reestablish natural conditions.
- g. The 1964 Wilderness Act creates Wilderness Areas as areas to be "untrammeled" by man, where natural processes should be allowed to dominate rather than the hand of man.

The Project area consists primarily, but not entirely in our view, of land in the Vail WUI. It includes both lands in the existing Eagles Nest Wilderness and lands being considered for inclusion (the Spraddle Creek Addition) in that Wilderness Area under the CORE Act pending in the US Senate. Portions of the existing Eagles Nest Wilderness are proximate to existing homes in the Town of Vail.

In general, ESWA believes that the Project attempts to balance the various competing interests given the factors listed above and the complex nature of the land located within the Project. In particular, the Project:

- a. Foregoes the construction of any roads, temporary or permanent, in the existing Wilderness Area and the Spraddle Creek Addition.
- b. Limits the use of drones or helicopters over the Wilderness Area to the ignition and monitoring of prescribed burns in areas that are in the WUI and would be unusually dangerous for ground crews to do.
- c. Allows only hand tools to be used in the Wilderness Area, and in the Spraddle Creek Addition if the CORE Act passes prior to work in that area.
- d. Does not involve any commercial logging or any sales of timber as part of the Project.
- e. Is designed to attempt to improve forest health by carefully tailoring treatment methods based on tree and undergrowth types.
- f. Broadcast burning, without any tree cutting, is proposed in Units 110 and 112, which Units contain land within the existing Eagles Nest Wilderness. This best acknowledges the wilderness character of these lands and the historic role of wildfires in these Units.

We also appreciate that the USFS reached out to ESWA and other local groups to discuss this Project, participate in field trips, and answer questions about the Project prior to issuance of the Notice. The public open house on the Project held on April 6 was greatly appreciated.

SPECIFIC CONCERNS:

ESWA does have some specific concerns and suggestions with respect to portions of the Project as set forth below:

1. Unit 108. Unit 108 is the area farthest from the Town of Vail and should not be considered part of the WUI. It is also part of the Spraddle Creek Addition. It should be removed from the Project. If it remains in the Project, work there should be more limited than currently called for.

Large portions of Unit 108 are already sparsely treed. Unit 108 is also adjacent to existing large open meadows that already provide natural firebreaks and safety zones for ground crews. Although embers from a fire in this area could theoretically be blown over the ridge between Vail and Unit 108, this is a remote possibility. Such embers could also arise from areas that are not included in the Project.

The Project already includes large areas of fire mitigation treatment between Unit 108 and the Town of Vail. How far away to conduct fire mitigation to reduce risk to the Town is a judgment call and balancing act. ESWA believes that given the remoteness of Unit 108 from the Town, the fact that it will likely soon be included in the Eagles Nest Wilderness, and the fact that extensive fire mitigation measures will be undertaken as a result of the Project between Unit 108 and the Town, the correct balance is to remove this Unit from the Project.

If Unit 108 is not removed from the Project, the scope of the proposed actions in this Unit should be more limited and spelled out in more detail. ESWA suggests that:

- a. The Unit be broken into sub-Units and the work in each sub-Unit better defined. As noted above, portions of Unit 108 are currently sparsely treed. What is the goal in these areas? Are all trees to be removed, and if so, why? If the goal is not to further open the area, removal of existing trees should be prohibited.
- b. What is the goal in the more densely treed portion of Unit 108? Will these be thinned, clearcut, only limbed, or otherwise treated? Which treatments will be undertaken in which areas, and why, should be spelled out and justified.
- c. The sub-Units should reflect the different kinds of trees in Unit 108. The Proposed Action indicates both lodgepole and spruce-fir are present. Are they in separate areas? Are they to be treated differently? The Proposed Action currently indicates that no clearcutting would be done for either tree type.
- d. Only dead and downed fuels should be cut and pile burned. Given the likely inclusion of Unit 108 in the Eagles Nest Wilderness, no live trees should be cut, particularly any mature trees.

2. Unit 104. Unit 104 is adjacent to the old Spraddle Creek Road and Spraddle Creek. Although this area is not part of the Spraddle Creek Addition it is immediately adjacent thereto and the access trail to the Addition runs along its western border. Given this, and the distance from Unit 104 to the Town, less intensive fire mitigation should occur.

No mechanical harvesters, feller-bunchers, skidders, or other heavy equipment should be allowed in Unit 104 for several reasons. First, the old Spraddle Creek Road has slowly been returning to a single-track trail since the Road was closed to vehicles some years ago. Use of heavy equipment will disturb this re-naturalization of the road. Second, the area has steep slopes, and use of heavy equipment, even in less steep areas, will likely result in increased erosion and sediment flow into Spraddle Creek with resulting negative consequences on the stream. We also note that water from Spraddle Creek is a source for the Town's municipal water system. Finally, an area at least 50 horizontal feet above Spraddle Creek Road should be left untouched to provide a more natural-looking corridor for hikers heading into the adjacent Spraddle Creek Addition.

3. Broadcast Burning of Aspen Stands. The Proposed Action calls for broadcast burning of aspen stands in several Units. The Notice suggests that such burning will help improve the health of aspens in these areas. Additional information should be provided to support this contention. The presence of large aspen stands in the Project area is a major aesthetic for the Town. The benefits of broadcast burning in these areas should be clearly established.

4. Effects on Soil. The Notice does not address or consider the impact of the proposed actions on the soil in the treatment areas. Fires can alter soil chemistry and fertility. This in turn can affect regeneration of plants and even trees in the areas. Decaying of dead trees can also have beneficial effects on soil fertility and insects (and the animals that eat the insects and on up the food chain). The Project should not remove all dead timber from the forest floor, as the natural decomposition of such material is critical to maintain soil and forest health. The Notice fails to consider the consequences of the proposed treatments on these critical elements of the ecosystem or address the need to leave some dead trees, standing or fallen, as a natural and important part of the ecosystem.

CONCLUSION:

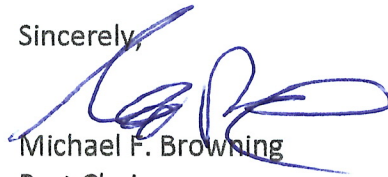
ESWA believes that naturally caused fires in Wilderness Areas should be allowed to burn wherever possible to reduce unnatural fuel loads that have resulting from past fire suppression efforts. However, where Wilderness Areas or proposed Wilderness Areas exist in the WUI, limited fire mitigation projects may be both necessary and appropriate to protect human lives and property and return the forest to more natural conditions.

The Proposed Action generally appears to have been well considered and will, hopefully, allow smaller fires to again be part of the natural landscape, even in the WUI. We request that the USFS consider the specific concerns and suggestions with respect to Units 104 and 108, and the broadcast burning of aspen stands that are set forth above.

We also hope that the Project will alleviate any concerns that the Town and public may about the inclusion of the Spraddle Creek Addition into the Eagles Nest Wilderness. The understandable desire to control wildfires in the WUI and the ecological, recreational, and

spiritual benefit of Wilderness do not have to be enemies if thoughtful people acknowledge and understand the need for both.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mike Browning', written over the printed name.

Michael F. Browning
Past Chair