



COLORADO
Parks and Wildlife
Department of Natural Resources

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February 20, 2025

Nick Mustoe - District Range
Dolores Ranger District – San Juan National Forest
29211 Highway 184
Dolores, CO 81323

Re: Dolores Prescribed Fire Pine Ecosystem Restoration Project Supplemental Environmental Assessment – Project # 67441

Dear Mr. Mustoe

Thank you for the opportunity to comment on the Dolores Prescribed Fire Pine Ecosystem Restoration Project Supplemental Environmental Assessment (EA). The purpose of this supplemental EA is to allow the use of bladed equipment for the creation of control lines within prescribed fire unit boundaries. Colorado Parks and Wildlife (CPW) has a statutory responsibility to manage all wildlife species in Colorado; this responsibility is embraced and fulfilled through CPW's mission to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. CPW has reviewed the supplemental EA and would like to offer the following comments to minimize potential impacts on wildlife from this proposed authorization.

Since the original Prescribed Fire Pine EA was signed in 2018, the Dolores Ranger District has worked to implement this plan and has conducted a number of prescribed fires in the district. This has resulted in the areas identified in the plan, which have existing roads that could be utilized as fire breaks, to have received prescribed fire. Remaining burn units with more difficult to control boundaries are still untreated. CPW recognizes that these residual units would benefit from low-intensity prescribed fire to not only increase forage for big game and improve habitat for a number of other species, but also reduce the likelihood of high-intensity fire that would reduce the carrying capacity of the landscape. Since the use of heavy bladed equipment has the potential to create larger impacts to the landscape than what was previously analyzed in the EA, CPW has drafted additional design features that should be considered for inclusion in the supplemental EA. These design features are intended to reduce impacts such as additional soil compaction, improve post-fire site reclamation, and reduce the possibility of fire lines being utilized by the public for trails and roads.



Jeff Davis, Director, Colorado Parks and Wildlife
Parks and Wildlife Commission: Dallas May, Chair · Richard Reading, Vice-Chair · Karen Bailey, Secretary · Jessica Beaulieu
Marie Haskett · Tai Jacober · Jack Murphy · Gabriel Otero · Murphy Robinson · James Jay Tutchton · Eden Vardy

CPW agrees with the Design Features listed on Page 25 of the 2018 EA and would like to offer these additional Design Features for inclusion:

- Prevent the spread of noxious or invasive weeds by washing vehicles, machines, and equipment prior to entering the project area and when moving from one area to another.
- Best Management Practices would be used to prevent erosion on constructed fire lines and/or temporary roads. Seeding and installing water bars on these new lines should be employed to mitigate the concentration of water flows and soil erosion.
- Areas in which heavy equipment was utilized, soil compaction should be reduced through the use of tilling, ripping, or other soil aeration techniques.
- Topsoil removed for fire line installation will be replaced post-fire and prior to seeding.
- Native drought-tolerant seed mixes will be used for post-fire reclamation of fire lines and should be tailored to the specific habitat and vegetation type that was treated.
- Yearly post-fire monitoring should be implemented to assure reclamation effort success and additional reseeding should take place as needed on a site-by-site basis.
- Unintended/undesired motorized and non-motorized access that may have been created by bladed equipment for the construction of fire lines would be restricted. Reestablishment of road closures and administratively desired roadway widths/conditions to pre-disturbance widths/conditions will be accomplished.
- To hasten recovery of vegetation and help eliminate unauthorized motorized and non-motorized use of bladed fire lines and temporary roads, use physical measures such as re-contouring, pulling slash and rocks across the line, placing cull logs perpendicular to the route, and disguising entrances through the use of dead planting the initial 300 feet or as needed to visually obstruct.
- Immediately restore control lines to a near undisturbed condition in the foregrounds (within 300 feet) of roads, trails, and developed recreation sites.

CPW appreciates the opportunity to be actively involved throughout this planning process and would happily discuss this project and our suggested additional Design Features at any time. If you have any questions, please contact Land Use Coordinator Peter Foote at (970) 375-6713.

Sincerely,



Adrian Archuleta
Area Wildlife Manager- Durango, CO

Cc: SW Region File; Area 15 File; Matt Sturdevant, Dolores District Wildlife Manager; Andy Brown, Cortez District Wildlife Manager; Nathan Seward, Area 15 Wildlife Conservation Biologist

