



February 21, 2025

Attention: Nick Mustoe
San Juan National Forest, Dolores Ranger District
Dolores Prescribed Fire Pine Ecosystem Restoration Project Supplemental
Environmental Assessment
29211 Highway 184
Dolores, CO 81323

Submitted via: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=67441>

*Comments concerning the Dolores Prescribed Fire Pine Ecosystem Restoration Project
Supplemental Environmental Assessment*

Thank you for the opportunity to comment. Please accept these comments on behalf of WildEarth Guardians.

The project of the Dolores Prescribed Fire Pine Ecosystem Restoration Project is 2400,000 acres of the Dolores District of the San Juan National Forest, stretching from the northwest corner of “The Glade” to the southeast corner of Haycamp Mesa. The project consists of first entry, second entry (post-mechanical), and maintenance burns to be conducted at eight to ten-year intervals, as proposed as authorized in the 2018 project Decision. The Purpose and Need of the Supplemental Environmental Analysis as related to the Dolores project is “to increase efficiency and efficacy of control lines constructed for purposes of implementing the 2018 Decision” by putting in 5-10 miles of additional control lines for facilitating prescribed (Rx) fire in some burn units.

It is stated in the Focused Environmental Assessment that “In more remote areas where roads, trails, and utility corridors are not present, implementation has been limited by the practicality of constructing control lines.” This seems to indicate that these areas have not been able to be “treated”, and the project proposes the possibility of new control lines, as described in the Proposed Action, in areas away from private lands or canyon edges. However, it later states that “Authorizing bladed equipment use for control line construction would allow the district to



increase the number of units ready for prescribed fire treatment per year and improve feasibility of implementing units adjacent to private land or canyon edges than would be possible if the means of constructing control lines was limited to hand lines and Utility Terrain Vehicle (UTV) drag lines.” This seems to indicate the focus is on increasing feasibility of treating units adjacent to private lands and canyon edges. Furthermore that “Use of bladed equipment would be prioritized adjacent to private land, along canyon edges where fire crossing control lines could result in a long duration event, and along unit boundaries without nearby pre-existing control features.” The current purpose is unclear on where the lines are proposed to be implemented and why. We ask for further clarification on purpose, and that this clarification provide greater specificity on where lines would be put and why.

The original Dolores decision identified on maps the location of fuel breaks. Will this SEA facilitate further clarity on fuel break locations? And finally, many of the fuel breaks proposed in the 2018 decision appear to be proposed on artificial human-created, and straight line boundaries. Can the Forest Service explain why they would use the artificial boundaries rather than natural contours of the land and landscape, and how such boundaries are more effective at reduce fire than working to put in lines where natural boundaries may exist on the landscape?

If the purpose focuses on additional community protection we ask you provide specific information as to how this project will protect communities by providing fire models demonstrating their vulnerability to fire on the opposite side of the proposed fuels breaks, demonstrating the needs for these fuel breaks.

Not having clarity on the total mileage of control breaks as proposed, across the project area is concerning. It appears the project may be taking a Conditions Based Management approach and seeking an uncertain number of miles control lines to be in place over an uncertain amount time. We ask the Forest Service prior to approving this project to further clarify for the public which units will have additional control lines with an estimation of where they would be. And we ask for clarity on how long this decision would be in place for.

In addition to these points there is much information that appears lacking. While communication with FS staff indicates that fuel breaks would be decommissioned and rehabilitated after burning details are lacking? How long would the breaks be on the ground before they are rehabilitated? As an example, may a line be put in place in 2025, but not be removed until 2035 if a unit wasn’t burned for 9 or 10 years? Relatedly, how long after a burn is conducted would it be before the breaks be restored? This information is important to fully understand the potential impacts of the proposed action. In particular, while these breaks are not proposed for use by ATVs or other recreationists, the breaks do provide access and



opportunity for illegal use of the forest. Coupled with recent budget and personnel cuts to the Forest Service, it's likely there will be reduced ability to enforce potential illegal access and actions. We ask the Forest to respond to the question, how will you monitor potential illegal access and actions and how will you reduce the potential of these illegal activities; especially in remote areas, where such breaks may be proposed to be constructed? Importantly, the Final EA for the Dolores RX notes on page 15 that "The Forest Service would revegetate both kinds of constructed control lines (see Design Features) after implementation if it is deemed necessary." How is necessity determined? Why would constructed control lines not be revegetated? Such rationale for decision making is not provided. We ask you provide it to the public.

Likewise, the proposed Action states "The Dolores Ranger District proposes to authorize the use of bladed equipment, such as skid steers with bladed attachments, masticators with dozer attachments, and type 2 (medium) and 3 (light) dozers to supplement already authorized methods of control line construction. Control lines would be up to 12 feet in width and down to the mineral soil. The majority of dozer lines would not extend a full 12 feet, but in scenarios where fuel loading is heavy, burn units abut private land or border canyon rims, and other high-risk scenarios, a 12-foot wide control line may be used." Are these actions considered Maintenance Level (ML) 1 roads or temporary access routes? Would these breaks be closed using brush, gates, or boulders, or just rehabilitated with brushing and raking? And again, will the Forest Service have the capacity and resources to monitor these rehabilitation and closure efforts? Furthermore, in the implementation of these additional control lines, with the decrease in resources influence your ability to inventory cultural resource prior to the implementation of each project following the strategy outline in Appendix C.I.C of the PA?

Related to the design features, can the Forest Service provide a track record for properly implementing design features? And can you clarify if the FS has the resources to review implementation and effectiveness? Due to funding and personnel cuts will the FS be able to actually implement the Design Features including pre-burn monitoring for raptors, willow flycatchers, elk, and others wildlife, as well as weed and rare plant inventorying as proposed and approved in the 2018 project decision?

Ebird data from areas within the project area indicates that species of birds of Continental Importance as identified by Partners in Flight (PIF) in the PIF 2016 Land Bird Plan are found in the project area. This includes Grace's Warbler, Olive-sided Flycatcher, Cassin's Finch, Virginia's Warbler, Flammulated Owl and Brewer's Blackbird.

See the following searches indicating presence of these species in the project area.

- 1) <https://ebird.org/hotspot/L2827939/bird-list>



- 2) <https://ebird.org/hotspot/L630719/bird-list>
- 3) <https://ebird.org/hotspot/L9611402/bird-list>
- 4) <https://ebird.org/hotspot/L15366595/bird-list>

There are many other sets of ebird data that were not checked by Guardians, however, there is enough data to conclude these species are found in the project on a regular basis. As such, can the Forest Service speak to how the SEA will work to reduce impact to these species of special conservation concern. While these species have not been identified as Species of Conservation Concern in the Forest Plan they are species which require management attention due to their highest-concern status to consortium of bird conservation organization known as Partners in Flight. In particular, can the Forest Service clarify if control lines would be put in during the breeding season of these species and may nest disturbing take place due to these activities?

We appreciate the opportunity to comment on this project action and seek greater understanding and clarification of the proposed action and the related potential impacts. We look forward to your thoughtful replies.

Sincerely,

Andrew Rothman

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