

Data Submitted (UTC 11): 10/6/2020 6:00:00 AM

First name: David

Last name: Honea

Organization:

Title:

Comments: Reference: Southern HD's Landscape Restoration Project 58742

Dear Sir:

The purpose of this letter is to submit public comment regarding the HD Restoration

Project 587 42. I am a landowner and resident (redacted) whose residence is

located (redacted).

First allow me to state that I understand the need and justification for proactive forest management and fire mitigation in the HD's. Those of us who live in the area are acutely aware of the issue of fire and constantly are on lookout for lightening strikes that might ignite a wildfire. We are very much aware of the steep slopes and difficulty in access.

In reference to the Scoping Notice Map, I can understand the value in opening a fire line that would run from the end of C.R. 525 east to the east end of private property, then north, apparently through Long Canyon, and ultimately connecting with the Saul's Creek road system.

That being said, I am very much opposed to opening that fire line to OHV traffic by designating it an OHV Trail. My reasons for opposing such a designation are based on the following issues.

The Ute Creek Trail 666 which starts at the end of C.R. 525 is already an OHV accessible trail into the Ritter Canyon complex. There is no need for another OHV trail in such close proximity. It is also my understanding that none of the OHV clubs or organizations in La Plata and Archuleta Counties are requesting additional trails. I therefore question the validity and need for another OHV trail in light of the numerous negative impacts that would accrue from it.

Those negative impacts cover a wide spectrum from disruption of wildlife, off-trail

surface damage, poaching and trespass hunting, law enforcement, and noise/traffic

impacts to residences immediately adjacent to the proposed fire line. Allow me to

expand on each of these issues in the following paragraphs.

I am not familiar with the north end of the proposed fire line at its connection with the Saul's Creek road complex. My comments and observations pertain to the section of the proposed fire line that runs from the east end of C.R. 525 through Armstrong Canyon and Long Canyon.

The end of C.R. 525 does not have adequate parking to easily support the current seasonal use of Ute Creek Trail 666. The parking there is an informal dirt pad that may provide parking for about four vehicles. There is often significant congestion at the end of C.R.525 during hunting season and sporadically during other timeframes. If the proposed fire line were open to OHV use, with a connection to Saul's Creek, it is reasonable to assume that traffic on relatively narrow C.R. 525 would increase. Multiple parking for vehicle/trailer/OHV rigs would become a more serious issue that would impact school bus access, USPS service access to mail boxes, and 14 residences.

The proposed fire line would run in very near proximity to eight residences that are situated near the USFS/private land boundary. Some OHV vehicles are adequately muffled and others are not. The latter case is a particular issue with regards to dirt bikes which are often very loud. Since there is no proposed restriction identified in the scoping notice that would restrict time of day or seasonal access, noise pollution would be a major negative impact to what is normally a relatively quiet area.

This matter is already an issue during hunting seasons when early morning and late evening OHV use is present on the Ute Creek Trail 666. The primary difference is that the Ute Creek Trail quickly deviates from the private land boundary and crosses over into Ritter Canyon where there are no residences. The proposed Armstrong Canyon fire line would route the OHV traffic in close proximity to many more residences.

There has been a long history of trespass issues in this area, particularly during hunting season. The proposed fire line paralleling private property creates access that increases the possibility of these problems. If the fire line is opened to OHV traffic during hunting season, hunting pressure will likely increase significantly due to the ability of hauling out carcasses by OHV. This inevitably will increase trespass hunting because the animals are often out feeding in the private land flats adjacent to the USFS boundary. Not only is this situation a trespass issue but negligent discharge of firearms onto private property also includes risk of bodily harm or livestock damage.

The areas of Armstrong, Trail and Long Canyons are wildlife sanctuaries due to the limited access currently available to motorized traffic. These areas also act as a critical transitional migratory route between the higher elevations of the Beaver Meadows corridor and the elk and deer wintering grounds that include the entire HD Mountains ecosystem. Bear and mountain lions frequent these drainages as well.

If the proposed fire line is opened to motorized traffic, then that area will likely become subject to not only greatly increased hunting pressure but also several damaging criminal misuses of the area. Due to its isolated nature, law enforcement monitoring of hunting activity will most likely be limited. As a result, instances of shooting from an OHV, traveling with a loaded weapon, leaving the fire line to travel off the designated trail, and hunting outside legal timeframes may well be prevalent.

It is understood that enforcement of hunting regulations is the responsibility of CPW and not the USFS. Although designating the fire line as an OHV trail does not automatically result in violations, it certainly enhances the probability of them by creating situations and opportunities where they can more easily occur. The mentality of many OHV based hunters, and particularly non-resident hunters, only exacerbates the problems.

In addition to hunting violations, two other potential problems can occur from OHV

misuse. The soils in the area are clay and weathered slate. When wet they are easily deeply rutted and subsequently heavily eroded during run-off. OHV travel off the fire line for any reason can easily damage delicate surfaces. There is already considerable evidence of this type of abuse reported in higher alpine elevations.

A second problem can result from OHV travel. Since OHV's are not required to be cleaned and inspected before using a trail, the propagation of noxious and invasive weeds is certainly present through under-carriage transport and subsequent dispersal along the trail edges or off the trail.

I understand the concept of multiple use of public lands. Unfortunately some multiple uses are inherently incompatible. To prevent conflict in the use of public land some types of use must be segregated. These situations occur primarily when motorized travel is allowed on the same trail as foot and horseback travel. Not only does the often noisy and high speed OHV traffic degrade the experience for foot traffic, it also constitutes a hazard for horse back riders. High speed head-on confrontations between dirt bikes and OHV's often result in a horse back rider being thrown when the horse rears or shies away.

In my opinion there are more than ample roads and trail systems open to OHV use in the Beaver Meadows area, the La Plata River Canyon, as well as the higher elevations near Purgatory, Silverton, Ouray, the areas on both sides of the Dolores River, and Telluride.

Designating the Armstrong/Trail/Long Canyon fire line as an OHV trail is totally unnecessary and potentially very damaging to a unique and very fragile ecosystem.

I would also like to comment on the topic of prescribed burning in this area. As indicated at the beginning, I understand and support fire mitigation using fuel thinning and mastication techniques. I am very much opposed to any prescribed burning in the Armstrong/Trail/Long canyon complexes. This area has three characteristics that make it very dangerous to attempt prescribed burns. Much of the topography is comprised of steep convergent up-slopes that would propagate a fire east very quickly, especially with

the prevailing westerly day time winds.

Equally importantly, the Armstrong/Trail/Long Canyon complex is considerably drier than the average precipitation attributed to similar elevations further west. In fact, although the canyons are only about 7 miles east of Bayfield itself, Bayfield receives substantially more precipitation than these canyons. As a result the moisture content of fuels in the area is very low and declining in the face of the persistent drought.

A significant health issue would also be present if prescribed burns were attempted in the Armstrong/Trail/ Long Canyon complexes. During the previous prescribed burns in Beaver Meadows, the Yellowjacket Pass area, and Fosset Gulch, major incursion of smoke into the Crowbar Creek and Armstrong Canyon drainages occurred. This incursion resulted from the nighttime cooling of the air and smoke which reversed the daytime prevailing west winds. There were at least 15 residences that were severely impacted.

If prescribed burns were attempted in the Armstrong/Trail/Long Canyon complexes, down-slope and down-canyon nighttime air flow conditions with the much closer proximity would render these 15 residences uninhabitable due to severely degraded air quality from smoke.

In summary, I strongly urge you to not designate the C.R. 525 to Saul's Creek fire line an OHV trail. Not only is allowing OHV use unnecessary, it would involve a multitude of negative impacts and problems with little to no benefit.

I also encourage you to use mechanical thinning and other non-burn fuel reduction techniques in this area. Prescribed burns would be very dangerous as well as almost certainly hazardous to the health of nearby residents.

Thank you for your consideration of these comments.

Sincerely

David L Honea