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USDI Bureau of Land Management
San Juan Center
Columbine Field Office
<http://www.co.blm.gov/>

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Dear Interested Party,

The *Pre-Decisional Draft Environmental Assessment (EA)* for the ***Animas City Mountain Fuels Reduction Project*** is available for your comment and review. You are receiving this letter because you provided input during earlier project planning.

BACKGROUND

The project seeks to respond to the hazard-fuels reduction goals and objectives of the La Plata County Community Wildfire Protection Plan (2006), San Juan/San Miguel Resource Management Plan (1985), and National Fire Plan (BLM, 2000).

The project analysis area for the Animas City Mountain Fuels Reduction Project is adjacent to and near the west/northwest boundaries of Durango, Colorado. The project analysis area encompasses approximately 1900 acres of public lands, of which, approximately 830 acres administered by the Bureau of Land Management (BLM) are proposed for treatment.

Treatment units consist of ponderosa pine/Gambel oak forests in close proximity to populated areas of Durango, Colorado. These middle-elevation forests historically experienced a relatively frequent natural fire regime. However, the natural cycle of fire was dramatically altered about a century ago, when fire suppression began in earnest with the establishment and expansion of communities, such as Durango.

Without frequent fire to reduce the natural accumulation of vegetative fuels, ponderosa pine forests are frequently denser in structure, with a more continuous Gambel oak/juniper understory. Where these conditions exist, a wildfire can move quickly through the horizontal continuity of fuel, and climb into the canopy through vertical "ladder" fuels, increasing the potential for high-intensity, rapidly moving crown fires.

This project is proposed to treat the project area in a manner that would result in a forest and fuel structure more closely resembling historic conditions. The project is designed to reduce the risk of wildfire to these public lands and adjacent private property, while mitigating adverse effects to recreation and visual aesthetics.

Public involvement has been on-going since early 2007, through scoping letters, public meetings and field trips, press releases, and listing on the San Juan Public Lands quarterly Schedule of Proposed Actions. A Draft EA was released for public comment in the fall of 2008. At that time, the project was put on hold until now, while alternative access and implementation options were further explored. Internal and external scoping revealed seven comment themes relating to the proposal:

- **Comment Theme #1: Need** – The project purpose and need has not been adequately demonstrated.
- **Comment Theme#2: Trail** – Rebuilding or improving the trail on Animas City Mountain would destroy the character of this route as a recreation trail.



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- Comment Theme #3: Wildlife – Wildlife would be negatively impacted, especially wintering big game.
- Comment Theme #4: Recreation/Visual Aesthetics – The proposed treatment would change the recreational experience by leaving an unnatural appearance and diminishing the quality of the scenery.
- Comment Theme #5: Weeds – Soil disturbance and equipment usage could increase the risk for noxious weed introduction and proliferation.
- Comment Theme #6: Costs – The BLM should consider more than the cost of the treatment when designing the Animas City Mountain Project.
- Comment Theme #7: Method of Treatment – Hand thinning or prescribed burning would have fewer negative impacts than hydro-mowing.

Consideration of these comment themes led the BLM to consider four alternatives in detail:

- Alternative I –No Action
- Alternative II –Hand Thinning only
- Alternative II –Hydromowing and Hand Thinning
- Alternative IV –Mini-Mowing and Hand Thinning (The Preferred Alternative)

These alternatives and impacts from them are described in detail in the EA.

PREFERRED ALTERNATIVE

Under this alternative, a small mower mounted on a piece of equipment such as a skid steer (Bobcat) would be utilized to treat the majority of the mountain. Two options could be used to get the mini-mower to the top of the mountain: either drive it up the existing trail, or fly it up using a large helicopter.

If using the trail to access the mountain, the mini-mower would not require trail widening, brushing, or detours to get to the top. A few large rocks in the trail may need to be moved. ATVs/UTVs would be used to supply fuel and service needs to the mower (approximately five ATVs per day).

If the contractor does not feel it is safe to drive their machine up the trail, then the option of using a large helicopter to airlift the machine to the mountain may be used. The helicopter would sling the mini-mower from the Forest Service meadows at Falls Creek to the top of the mountain. The flight time would be minimal and the helicopter would not be flying over any homes. The large helicopter would not be landing on Animas City Mountain but would instead be able to set the equipment down via a long line. There would be one trip to deliver the mini-mower at the beginning of the project, and one trip to remove it at the end of the project. Additionally, diesel fuel to supply the mini-mower could be flown up using a smaller helicopter. Approximately 2-3 trips per week, with flight time of less than 10 minutes would be needed for fuel delivery. The fuel would be stored in barrels within a rubber containment dike. Flights would be completed and the mower removed prior to the winter closure.

Mitigation corridors adjacent to trails would be hand thinned. Outside of the trail corridors, vegetation too large for the mini mower to handle would be thinned by hand. Slash from this hand treatment would be disposed of by limbing and chipping with the mini-mower or hand piling and burning. The mini-mowers could handle approximately 70% of the vegetation requiring treatment; the additional 30% would need to be treated by hand crews with chainsaws.

Additionally, the EA describes a long list of Design Criteria, designed to reduce or mitigate impacts, which will apply to project operations. The EA also describes in detail the treatment prescriptions, which are individually tailored for each treatment unit.

This current proposal differs from that described in the earlier Draft EA in the following ways:

- Addition of the option to use a helicopter to transport equipment and fuel to the top of the mountain in the preferred alternative.

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- No trail reconstruction or rehabilitation work needed or performed under the preferred alternative.
- A fourth unit originally included in this EA (along CR 205) was extracted from this project and authorized separately.

HOW TO COMMENT

The EA is available for review and download at:

http://www.blm.gov/co/st/en/fo/cfo/nepa_documents.html

Written, hand-delivered, and electronic comments concerning this action will be accepted until May 28, 2010. It is the responsibility of persons providing comments to submit them by the close of the comment period.

Written comments may be mailed to: **Cam Hooley, Environmental Coordinator, Columbine Field Office, POB 439, 367 S. Pearl Street, Bayfield, CO 81122**, or hand-delivered to the same address.

Electronic comments can be e-mailed to: **chooley@fs.fed.us**. If comments are sent electronically, please submit them in plain text (.txt), rich text format (.rtf), or Microsoft Word (.doc) format in a common font such as "Times." For electronically mailed comments, it is the sender's responsibility to ensure that the comments were received by the BLM in a timely fashion, such as by sending with an electronic confirmation of receipt.

Comments received in response to this solicitation, including names and addresses of those who comment will be considered part of the public record on this proposed action and will be available for public inspection

You may obtain additional information about this project, or request a hard copy of the EA by calling Shawna Legarza, Project Leader, at (970) 884-1427, or Cam Hooley, Environmental Coordinator, at (970) 884-1414.

The public will also have the opportunity to learn about the proposal and analysis and ask questions at an open house to be held Thursday, May 13, 2010 at the Durango Recreation Center. BLM staff will be on hand to offer information and answer questions from 4:30 to 8 p.m.

Thank you for your interest in the project.

Sincerely,

/S/JED BOTSFORD for

MATT JANOWIAK

District Ranger/Field Office Manager