



November 27, 2018

Richard Truex
Acting District Ranger c/o Brett Crary
PO Box 190
Minturn, CO 81645

Dear Mr. Truex,

Please accept this letter as formal comment for the Muddy Pass- Sheephorn Project and thank you for the opportunity to comment on this project. The Town of Vail would like to formally support this proposed action with consideration for the comments below. The Town of Vail is keenly aware of the elevated risk of wildfire and declining wildlife populations. We feel that this project will help to decrease wildfire risk to neighboring communities and infrastructure while simultaneously improving wildlife habitat in critical winter range. Please consider the following comments in making your decision.

Comment 1: Specifically call out “reduction of wildfire hazard” as a purpose of the proposed action as listed on Page 3. Specific fuel loading and target fire behavior should be included in prescription design at project implementation. Additionally the project should be designed to incorporate the protection of community and infrastructure from wildfire.

Comment 2: The proposed project will decommission a number of existing non-system roads (page 3) this may be counter productive to future wildfire suppression actions. We would recommend evaluating opportunities where these roads can be left in place and placed under “administrative use only” status, instead of being decommissioned.

Comment 3: We support the use of a variety of ground based mechanical logging actions to create more age and species diverse forest landscapes. Of particular importance is the support of pre-commercial thinning in previously harvested stands. This action will greatly improve vigor and decrease insect and disease issues in young forest stands.

Comment 4: Broadcast burning is specifically listed under coppice treatment (page 4) as a way to regenerate aspen stands, reduce conifer regeneration, and improve wildlife habitat. We would request that the positive benefits of broadcast burning on reducing wildfire fuels also be considered. Additionally, we request that consideration be given to expanding the broadcast burn units eastward

into the Dowd Junction and Buffehr Creek areas as a means to improve wildlife habitat and decrease wildfire fuels adjacent to our community.

Comment 5: Slash management is a necessary component of mechanical harvest. On page 5, broadcast burning should be added to the listed slash management methods. Broadcast burning can be a cost effective and beneficial method of slash removal in lop and scatter harvest operations, significantly decreasing wildfire risk.

Comment 6: Our forest environment does not currently contain enough openings. Openings provide a variety of wildlife benefits as well as provide strategic options for wildfire suppression. Many of the mechanical harvest actions have minimum stocking requirements post-harvest. We request that consideration be given to non-stocking as an acceptable post-harvest result and included in the project design.

Comment 7: Under transportation on page 8, 27.74 miles of existing road will be decommissioned as part of the project. To assist in future wildfire suppression actions we recommend that these roads be closed to the public but left in a condition that allows access to firefighting equipment and personnel.

The Town of Vail would like to thank you for the time you have taken to fully analyze this project. If you have any questions regarding these comments please direct them to:

Paul Cada
Vail Fire and Emergency Services
Wildfire Program Administrator
970.477.3475
pcada@vailgov.com

Sincerely,

Greg Clifton
Town Manager
Town of Vail