

Concerns and Comments of Castle Valley Citizens Group

Potential Negative Impacts of the BLM Project

1) Little or no fire reduction

The project is billed as a “Wildfire Mitigation Project” on the WRI (Watershed Restoration Initiative) website, with the primary objective being to:

Reduce the risk of destructive fires to Castle Valley by creating fuel breaks of mosaic open patches and thinning.

At this time, given the lack of definitive science (see., e.g., the review of literature on mechanical vegetation treatments, Jones 2019) several things are not clear to us:

- (1) that the proposed thinning of up to 70% of the pinyon and juniper throughout the project or 100% removal in particular sites is necessary to reduce the risk of destructive fires to Castle Valley
- (2) that even with the proposed thinning wildfire would not sweep through under particular fire conditions
- (3) that thinning at the southern end of the project brings any particular protection to Castle Valley
- (4) that lop-and-scatter doesn't increase fire danger
- (5) that thinning at the northern end of the project, where juniper trees are not dense, brings any particular benefit
- (6) that the plans to clearcut 100% of pinyon and juniper in some patches serves any purpose
- (7) that hand thinning small juniper wouldn't be sufficient to prevent densification of the juniper; or
- (8) that the greatest value wouldn't be a program to make sure the surroundings of the homes in Castle Valley have been managed for fire-safety.

Other Concerns:

- a) Loss of most pinyon
- b) Reduction of biocrust
- c) Reduction of water due to evapo-transpiration
- d) Increased bare ground and erosion
- e) Decreased habitat for birds using pinyon-juniper
- e) Increased invasive species on disturbed ground
- f) Creation of motorized roads
- g) Visual impairment
- h) Loss of mule deer cover
- i) No significant increase in “forage” for wildlife and livestock

Elements of a more beneficial approach to the project

- Limit the project to Phase 1 only and any other PJ actions in the watershed would be proposed with a separate NEPA process and analysis.
- Use chainsaws only
- No clear-cut patches
- No cutting of any pinyons
- No cutting within 50 feet of washes
- Cut junipers only under 4”
- No lop and scatter
- Remove debris or chip into piles (not scattered chips)
- No firewood collection
- Close all user-created routes (i.e., those not authorized by BLM via NEPA) to motorized travel
- Close all washes to motorized travel
- Educate/supervise the hand-thinning crew on low impact methods to limit impacts to biological soil crust to the extent possible