

Appendix C:  
Public Comments to Draft Mitigation Report

12-03-2001 10:19 FROM-BOISE DISPATCH

208 334 3499

T-037 P-002

F-008

301-417-5801

November 28, 2001  
11618 Emerald Rd.  
Nampa, ID 83686

RECEIVED  
BOISE FIELD OFFICE

2001 NOV 30 AM 9:00

U. S. Department of the Interior  
Bureau of Land Management  
Lower Snake River District  
Boise, ID

Dear Sir:

The following comments apply to the Draft Wildland-Urban Interface Communities-at-Risk Mitigation Assessment for the Silver City Assessment Area. I attended the meeting November 14, 2001 at the Nampa Civic Center. My husband, son and I were in Silver City during the week of the Rough Diamonds Fire in August. We did not leave town until after the fire was contained at the end of the week. We can claim first hand knowledge of the fire situation in Silver City. We own a house on Lot #31 high on the east hillside overlooking Silver City. The BLM fire personnel were professional and easy to work with. They taught us a lot.

#### Escape Routes

The Rough Diamonds fire could have easily cut off all normal escape routes from Silver. There are other ways out of town known to locals that are possibly passable by 4 wheel drive vehicles. But if a fire occurred on a holiday weekend with many tourists in town, the situation could be very dangerous. I strongly urge the BLM to allow maintenance or to maintain at least two roads out of the Jordan Basin. The road up Long Gulch should be rerouted out of the creek bottom and then maintained the rest of the way up to the haul road near the Beaver Ponds. The road up Silver Chord needs maintenance in at least one spot and it could be a viable alternative if the other road was cut off by fire. These two roads would provide escape routes to the east and west of Silver City with both roads culminating in defensible "safe" areas.

#### Helispots

As the owners of the home mentioned east of town, we would be willing to work with the BLM in establishing a helispot behind the house.

#### Dip Sites and Fill Sites

The ice pond above Silver City should be rebuilt. It is mostly intact. It is an historic structure and an historic feature. Water impounded there could be let down to a dip site above the culvert at Jordan Street and/or at another site accessible to the road for access by the tender trucks.

#### Structure Protection

The fire crews that assessed the houses in Silver had to say that some of the structures were not defensible from fire. We passed this word on to various homeowners and they took action to establish defensible perimeters around their homes. Many homeowners have taken no action. I suggest that ANY help the BLM would offer to the Silver City Homeowners Association, such as a fire truck and/or water tank, be tied to proof that the homeowners have trained to fight fire and have established a plan of attack and proper use of resources in case of a fire. I also suggest that the BLM approach homeowners as individuals and not through the Silver City Homeowners Association.

#### Morning Star Mine as a Water Resource

I would suggest follow up on this idea in conjunction with Millers and the mine owner. It would provide a good source of water with minimal visual impact on town.

#### Timber Harvest

I support harvest and thinning of dead and dying firs in the Owyhees. I would like juniper eliminated.

12-05-2001

10:38

FROM-BOISE DISPATCH

208 384 3468

T-037 P.003

P-008

I hope that the action plan proposed can be implemented. I am very wary that nothing will be done. If no dead timber is cut and no plans enacted, Silver City is in grave danger from wildland fires. The danger will only increase with the years. Please don't let this plan become so watered down and bogged down that no action is taken.

Sincerely,



Jan Hyslop

RECEIVED  
BOISE FIELD OFFICE

November 20, 2001

Randy Eardley  
Lower Snake River District  
3948 Development Drive  
Boise, Idaho 83705

2001 NOV 30 AM 8:00

Dear Mr. Eardley,

Silver City people who attended the Fire Plan presentation meeting in Nampa last week tell me that you are interested in hearing about individual problems as well as reactions to the general overall plan. I am sorry I could not attend because I am most interested in fire prevention and all who attended the program report that the presentation was excellent. I hope the information will be available in printed form soon. Below is my situation and my opinion regarding fire protection.

#### GENERAL

The town water system, which has been inadequate since its beginning, is now dangerously dysfunctional. The problem is being compounded because Silver City residents are increasing their water demands by adding modern conveniences and desiring higher health standards. The town governing body (Silver City Property Owners, or SCPO) has refused to acquire additional sources of water. The town could afford it because most of the residents are far wealthier than the average Idaho citizen. However, in the hopes of getting financial aid from the deLamar mines or from the BLM, they have not considered paying for a system. Also a few residents believe that lack of water may curtail public interest in the town's historic values, prevent commercial development and discourage home owners from active use of their property. Now the threat of fire may motivate the residents to address the problem although the lack of participation in your meeting indicates that the usual apathy still reigns.

I strongly urge the following:

Location and development of additional sources of water: new springs and wells sufficient to service a small village of 300 people in 70 homes, tourist facilities for 200 people housed in one hotel, two inns and five rental units and fire protection for 70 buildings.

A fire water storage unit of 30,000 gallons (only 15,000 available now), either a dam or tank or both. Increased fire education and fire drills.

A practical system to fight fires including immediate and protracted response. Immediate response is the better idea.

The BLM could strengthen the building owners' motivation to participate in fire prevention by pointing out that each home owner signed an agreement with the BLM to protect the integrity of his building as part of a historical site and that part of that covenant involves fire protection, paying fire fighting fees, etc..

A citizens' fire board could be appointed by the SCPO board to monitor fire risks and compliance. That board could interact with government agencies on a regular basis, set goals, recruit trainees. If any pressure or control were exerted by the citizens' board and backed up discretely by BLM clout, interest in fire prevention might improve. Some of the Silver City residents might sell their homes because many of them come to Silver to be completely free of all responsibility of all kinds. Good riddance!!!!

BLM should set a good example for residents by exercising good fire prevention management on the public lands entrusted to it. The BLM should provide a fire break around the

town which could be defended in an emergency. The BLM should control the fire potential on the public land within and bordering Silver City. The BLM should involve the building owners adjacent to the public land area that the BLM intends to improve by initiating telephone or personal conferences. Interaction is essential.

The diseased fir stand on the east flank of Florida mountain should be examined by a forestry specialist. Most of the trees there have been in extremely poor condition for many years. They make poor firewood and have been full of bugs (worms, etc.) for many years. What ever the BLM decides to do is acceptable to me as long the action is recommended by a forestry expert who is prescribing for the future as well as for the near-term.

### MY INDIVIDUAL CONCERNS

My properties (three acres of the TipTop millsite and Lots 87, 98, 93, and 105) are interseed with BLM land. I would like to cooperate with the BLM in exercising good fire protection for our common problems. I propose that the BLM and I work out a fire protection plan tailored specifically for our shared lands and that we maintain a minimum but effective amount of communication to make sure that each of us is paying attention to and doing something about implementing the plan.

The stands of quaking aspen and willows on my lands and public lands would normally function as fire retardants. From neglect, dead plant material within them has increased to such a point that they are now fire hazards. I don't know what to do and would appreciate advice from experts. The quaking aspen stands must be guaranteed water on a year around basis or they will continue to die. I own the water rights to the overflow from the city tank. When I allow the SCPO Association to divert some of that water to the winter watchman's use at the IOOF hall, I have to make sure that they don't take it all. There is plenty of water for both uses in the winter months but the town must recognize that the quaking aspens are worth keeping and that the present system of distributing the water is poor. The trees suffer terribly when the town bogs all the city system's capacity. I need to institute a vigilance system to guarantee that the city watchperson and my watchperson effectively cooperate their efforts. The BLM owns about sixty feet of the quaking aspen stand which lies between my Lot 105 and my TipTop millsite. Perhaps the BLM could provide the expertise to figure out a plan, and the town and I could implement the plan and pay the bills.

The public land between the cemetery and my Lot 87 (my primary residence) is a severe fire threat. Some of the plant material in that strip provides stabilization for the embankment next to my house. Whatever clearing of fire fuel is done needs to address stabilization of that embankment. I should be able to get title to the impacted area or else the BLM should pay to stabilize the embankment. Let's talk.

The BLM and I should cooperate on an agreement about the fire hazards that we share, a plan to cure the present problem and develop a plan for future action on all the lands where we are neighbors. I admit that my land management is as poor as those of the BLM. Lets put aside blame and concentrate on solutions. If you have noticed, the whole town watches and often mimics my relationship with authority, trespassers and neighbors. Here's a chance for both of us to set a good example. I'm ready.

I would like to participate in the methods to be used to prevent fire. I am willing to listen to and implement suggestions made by experts. I am willing to share the expenses of work on the public as well as on my private lands but I would like to have the opportunity to tailor the costs

of labor and materials to my specifications. As a rule, I would rather pay a bill than recruit and supervise the labor and purchase materials, but I am wary of cost-plus agreements. Let's talk.

I enjoy working with the BLM and the Fire Agency because I think that you know what land and fire management need. I am a little hesitant to turn all of the the planning and implementing over to the government but I welcome the opportunity to cooperate.

Sincerely,

cc: Jenna Whitlock  
Rosemary Thomas  
Jerry Barker  
Clarence Orton

*Glenn A. Otto*  
250 Austin Ave.  
Atherton, Ca. 94027-4006  
650-368-5004

Barker, Jerry

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From: MOSALIO@aol.com

Sent: Wednesday, November 28, 2001 2:34 PM

To: jbarker@dynamac.com

Cc: randy\_eardley@blm.gov

Subject: Comments on Draft Mitigation Plan Report - Silver City Assessment Area

Pg. 2 Item 1.0 Add - Study water sources on Florida Mt. and develop sources to increase water flow to the Silver City water system.

Change second item to read - Develop and maintain an additional water storage tank for the Silver City water System and improve the "ice pond" on Jordan Creek above Silver City to provide .....

Pg. 3 Item 4.0 para. 1 correction - residents do not remain as caretakers. During the winter the Silver City Property Owners, Inc. hire a watchperson to care for the town. The next sentence should read: Deed covenants and the Owyhee County Silver City Historic Preservation Ordinance requires that all .....

Pg. 10 Item 8.0 para. 1 - add as priority #2 Study water sources on Florida Mt. and develop sources to increase the water flow to the Silver City Water System.

Correct item #2 to read: Develop and maintain an additional water storage tank for the Silver City water system (20,000 to 30,000 gallons) and conduct maintenance on the existing storage tank to extend its life. (sand blast and recoat interior)

Pg. 11 Item 8.1 para. 1 Add: BLM to thin brush on BLM ground within Silver City.

Pg. 12 para. 2 Comment: New road construction and existing road improvement will cause negative impacts to Silver City and surrounding area. Improving roads around Silver City will increase traffic through Silver City and increase other negative impacts associated with increased usage. Use the money for reducing fuels/fire break around Silver City's perimeter. Helicopter logging is preferred plus no logging should be allowed during winter as plowing roads to Silver City causes more problems.

Pg. 12 para. 4 Comment: Please explain the 50% split of costs and provide an estimate.

Pg. 13 Item 8.2 para. 1 Add information about additional water sources development as stated under 8.0 pg. 10 para. 1.

Pg. 13 item 8.2 para. 2 Tank size 20,000 to 30,000 gallons.

Pg. 13 Item 8.2 para. 3 Tank should be located above the existing storage tank.

Also, incorporate somewhere in the plan the proposal to provide Silver City with a newer fire truck.

All these items are items which BLM and myself brought up the night of the meeting in Nampa.

In the back of the plan is Appendix B: Structure Protection Plan. Under page 2 of the plan is the Action Plan. Under Escape Routes is a proposal to improve the Silver Cord road. This is not a good idea. I stated some of the reasons above why not to build new roads or improve existing roads around Silver City. (other than the Jordan Valley and Murphy roads) Other reasons are: cost and upkeep, steep and slow, plus the Silver Cord road runs right back to the Silver City/Murphy road unless you want to improve many many miles of road to Triangle via Boulder Creek or around the head of Jordan Creek to Flint or on to Delamar which is the Jordan Valley Road. In other words its a waist of money plus other impacts need to be considered.

Thank you, Sincerely,

CLARENCE ORTON

12/5/01

Jim Hyslop  
11618 Emerald Road  
Nampa, Idaho 83686

208-466-5064  
(Nampa)

208-890-6718  
(Silver City)

November 15, 2001

Mr. Randy Eardley  
Lower Snake River District  
3948 Development Avenue  
Boise, Idaho 83705

Mr. Jerry Barker  
Dynamac Corporation  
[jbarker@dynamac.com](mailto:jbarker@dynamac.com)

Re: BLM Contact No. 1422-N660-C98-3003, Silver City Assessment Area

To whom it may concern:

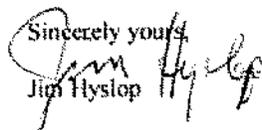
I was one of the few Silver City residents that attended your meeting in Nampa to present the findings of the Dynamac study. The lack of attendance by my neighbors, glaringly points to the truth of your statement on page 11 of the Draft Mitigation Assessment, "the public education and outreach program may, in the long run, prove to be the most effective in reducing wildland fire risk in the Silver City assessment area." Our failure to attend this meeting demonstrates the challenge ahead.

One thing that is mentioned, in passing, in the report is the work by SCA last summer. I encourage BLM to utilize the resource of the Student Conservation Association. More even, to partner with them. It's one of those, bang-for-the-buck opportunities. SCA methods might bring Silver City people along in a way that agency and contractors don't. It's a synergy thing, in my way of thinking. Please facilitate SCA to bring its resource along in the Silver City fire mitigation effort.

Both Jenna Whitlock and Jerry Barker encouraged me to send my comments regarding Jordan Creek impoundments. That is the main point of this letter. We could impound water measured in portions of a million gallons, rather than in thousands of gallons. A new water storage tank might hold 60,000 gallons, but the old ice pond could contain  $\frac{1}{4}$  to  $\frac{1}{2}$  of a million gallons. If we could remove the long-ago-deposited sediments it might hold much more. This sediment is not currently in the stream channel so we wouldn't be messing with the fish habitat and it could be utilized locally to resurface our long-neglected roads. The county road department might even help with the job. The sediment might also be used for additional campsite development; much like was done at the public campground this summer.

Please consider the Ice Pond Plan that I am attaching (below). It has long made sense to me to utilize Jordan Creek as the necessary component to fill the "recharge" requirement that a worthy structural fire fighting system dictates. Its utilization as a wildfire water component makes sense as well.

Thank you for your effort in safeguarding Silver City. Our buildings are a national treasure and worthy of your efforts. Our community will realize this in time and take a more determined stand in its preservation. Also, thank you for your invitation to comment further. I am at your service, should you need further clarification or on-the-ground perusal. My cell phone (above) is my Silver City connection to the outside.

Sincerely yours,  
  
Jim Hyslop

## The Ice Pond Plan

As Envisioned by  
Jim Hyslop, Silver City resident  
11618 Emerald Road, Nampa, Idaho 83686  
Phone: 208.466.5064 or 208.890.6718  
November 15, 2001

Please accept this as a comment to the Draft Mitigation Plan Report, Lower Snake River District, Silver City Assessment Area, Work Assignment No.: BLM4-73, October 2001.

Almost twenty years ago, I was a member of the Silver City Water Committee. Ed Jagels and Martin Peterson were the other members. Ed later retired from the Committee and Bob Leonard took his place. It was during this time that Oscar Anderson was BLM Area Manager. He and I talked about Silver City water system needs. Near the end of one fiscal year, he phoned saying that there may be money that BLM could put into materials for Silver's water system. The tank and pipe system we have now resulted from Oscar's work. Also, it should be commented that BLM-Silver City relations have been greatly enhanced by this contribution. Ultimately, the public has gained unmeasured rewards as well.

Ed Jagels and I visited with people at the Idaho Fire Rating Bureau. We learned of details that are necessary for a worthy fire fighting system. Recharge of the system was a component that our spring seemed unable to accomplish. To achieve the necessary gallonage to accomplish the recharge requirements, we obviously looked to Jordan Creek. USDA's Soil Conservation Service (now NRCS) came to Silver to assess the Ice Pond impoundment concept. Stream flow-speed seemed to be a detractant. However, if there is also a pond in Silver that could serve in an initial fire attack, the ice pond water could be there in time for a sustained attack and for recharge needs.

A two-pond system answers the concern about getting water from the ice pond to town. The ice pond will hold upward to a half million gallons. A pond in town could hold 50,000 gallons or more. Neither pond would have to be maintained at full capacity all year long. They only need to be filled ahead of the time that natural stream-flow drops below necessary fire suppression needs; that is, about the first of July. This being the case, the stream could flow normally from November through June. The mighty spring run-off would flow through the pond area just as it does today, thus minimizing over-flow (spillway) considerations.

I was a farmer in Canyon County for twenty years. I observed simple impoundment structures wherein boards dropped into concrete notches in a headwall served very well to dam up an entire canal. These structures have been in place in Idaho for nearly a century. Properly designed, Silver City could be well served by this low-tech impoundment system.

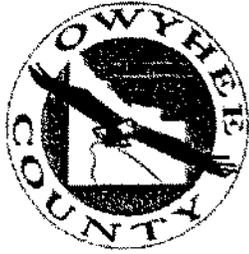
It would be reasonably easy to make an in-town impoundment at the main culvert crossing on Jordan Street. The fill material around the culvert is porous, so a clay layer on the up-stream base of the fill would likely be necessary. Fencing might also be necessary to keep swimmer/waders out. This pond could have a pump station that would discharge directly into the town water system. Or, the pump could be used to fill tenders or fire trucks. Obviously, if creek water were pumped into the town's water system, the pipes would have to be sanitized before culinary water could be delivered again. As Carl Liable said at last night's meeting, "After the fire is suppressed, we would worry about re-cleaning the system."

The issue of impounding water does reach into down-stream user's water rights issues. I believe a reasoned discussion with those users would resolve their concern. Silver City would not actually consume any water impounded, except in the event of a fire. Stream flows would remain the same, in all seasons, except for the hours it would take to fill the ponds initially each year. Having ponds, in addition to the pools that now come with the low water season, fish habitat might actually be enhanced.

Also, you might be well served to know that there were two ice ponds above Silver. The lower pond was just a short distance above the present public campground. There is still a remnant of the concrete check in the streambed. The dam material may all be gone now from this lower ice pond.

Please do not hesitate to contact me if I can be of further service in this, or any other effort to improve Silver City's fire suppression and prevention efforts. Indifference and inaction exacerbate the threat of fire in Silver. I am one, ready to contribute everything possible to assist Silver in its preservation.

Thank you for considering this concept for increasing water supply for fire fighting needs in and near Silver City.



**OWYHEE COUNTY**  
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(208) 845-2035

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February 19, 2002

Randy Eardley  
Fire Mitigation and Education Specialist  
Bureau of Land Management  
3948 Development Avenue  
Boise, ID 83705

Re: BLM Letter of January 17 requesting Comment on Silver City Wildland Fire Mitigation Plan

Dear Mr. Eardley:

This Board asked that the Owyhee County Natural Resources Committee review the Fire Mitigation Plan and recommend appropriate comment. In their review, the Committee found many elements of the plan to be beneficial, constructive actions that will decrease the likelihood of catastrophic fire damage in or around the Silver City Historic District. Unfortunately, the Committee also found several issues that they recommended this Board should bring to your attention.

As you may know, Owyhee County is committed to the protection of private property rights and has a record of strongly supporting the rights of our citizens with respect to their private property holdings. Several elements of the proposed plan are potentially in conflict with our position on property rights. It appears that a significant element of the proposed plan calls for creation of additional water storage capacity for the town of Silver City, with the accompanying requirement to obtain additional water rights. In fact, page 16 of the plan states, "Florida Mountain would be investigated for additional water sources to augment the city's water supply." While that might seem like an acceptable way to moderate fire danger in Silver City, it raises the contentious issue of conflicts between current water rights owners on Florida Mountain and the possibility of contested rights, with the associated costs of such contests. A member of the Committee, employed by the Delamar Mine, advised the Committee that his employer has made an extensive search of Florida Mountain for water and has determined that no significant sources of water are available. While the plan intends to consider the use of waters currently thought to be available from flooded mines in the area, comments made during the Committee Meeting are cause for concern and possible conflict among the varied interests within the County. During the discussion it became apparent that the Silver City residents would prefer that the

search be conducted for potable water which they could use for daily domestic use in addition to occasional firefighting. That apparent preference has the potential to pit one element of the county population against another in contests over water rights and is not something this Board will endorse.

In addition to the specific issue of private property water rights, other questions concerning property rights were raised by the Committee members. Several members present during the discussion owned, or represented the owners of, private property located in the study area, but outside the limits of Silver City. These owners indicate that they have not contacted by BLM or Dynamac regarding this proposal. We believe that this is a significant issue that must be corrected before this report can be considered final. Mr. Ernie Bahem, Owyhee County Assessor, 495-2817 can provide you with a list of private property owners within the study area.

In addition to the comments already made regarding the proposed water storage project, this Board questions the priority established within the project list. The Committee felt, in particular, that placing the last priority (see page 13) on stationing a fire truck in the town during the fire season was incorrect. The members recommended, and we concur, that positioning a means of mobile firefighting in the town during the fire season should be a high priority project. We agree with the Committee in their belief that the equipment should not be a high-tech, state of the art item of equipment. We concur with the Committee's belief that BLM and the Contractor may have placed this item last in priority due to the expense and man-hour cost that would be required to place a high-tech fire truck in the town. We recognize that such a piece of equipment would require the continuous presence of BLM firefighting personnel and would be very difficult for the BLM to support. We concur with the Committee recommendation that a very low-tech item be obtained and positioned that could be operated by the residents as the first line of defense against any fire originating within the town. We agree with the Committee that a project item of this type should be at, or very near, the top of the priority list for this plan.

We appreciate the effort and expense that have gone into the creation of this plan and believe that the amendments suggested will make the plan more effective and beneficial to all concerned.

Sincerely,

  
Hal Tolmie, Chairman

cc: Ernie Bahem, Owyhee County Assessor