DELTA COUNTY, COLORADO

BOARD OF COUNTY COMMISSIONERS

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December 8, 2017

TO: Grand Mesa, Uncompahgre, and Gunnison (GMUG) Forest Plan Revision

Thank you for the opportunity to provide comments on the Draft Assessment of the Grand Mesa, Uncompahgre, and Gunnison Forest Plan Revision. Public lands are critical to the economic sustainability of Delta County and decisions made in this document have a real impact on the county and our constituents. Delta County will be participating in the full plan development as a cooperating agency and thus these comments will be limited in scope and scale.

Benefits to People: Multiple Uses, Ecosystem Services, and Socioeconomic Sustainability:

1. Include sole propietship business to accurately reflect the importance and interrelationships between USFS lands and our business community in Delta County.
2. Delta County supports the exploration of Payment for Ecosystem Services for the GMUG as funding for projects and treatments continues to decline. This will create partnerships that will benefit the landscape.
3. Rangeland health as described by excellent, good, fair and poor are listed appropriately, however to lump a conflict with domestic sheep as a condition for range condition is not appropriate use of the classification. The conflict is a factor but not an indicator of rangeland health. Additionally, comparing this area to Arizona if the climate continues to change is a stretch given the time frame of the Forest Plan.
4. Ranches that utilize USFS allotments for livestock grazing provide a significant buffer around existing public lands as documented by Forest Service bulletins. This buffer and the benefit to wildlife, public and view shed needs to be added to this section.
5. The paragraph on page 22 that lists drought etc. affecting outdoor recreation cultural service does not appear to fit here. Fits better in the last paragraph of that section.
6. Forest health should also be listed as a benefit under Timber.
7. Fens should be addressed in the document but detailed as to how to work with them and not use them to shut necessary projects down.

Renewable and Nonrenewable Energy Resources….:

1. Delta County encourages the full spectrum of energy uses where it is practical and feasible. All uses are encouraged and the forest plan should be written to provide for flexibility in the energy portfolio.
2. Energy projects are polarizing; however, there are areas of the USFS where it is practical and viable. Delta County urges the USFS to use the intent of a Forest Plan and locate energy projects where feasible.
3. Legislative proposals must include surrounding counties and not just the county that brings the proposal forward due to the landscape impact on decision making.
4. Research Natural Areas and Special Interest Areas should not become defacto

wilderness areas in this document. Delta County is not opposed to these areas as long as they are not in perpetuity similar to Wilderness Study Areas

Infrastructure:

1. Include County recreation and master plans in the list of resources and document their long term plans that would impact the USFS.
2. Long term maintenance of energy corridors should be addressed in the forest plan so that lengthy processes are not the norm when proactive fire suppression and vegetation treatments are needed. Energy corridors and open areas for this infrastructure are in the best interests of all including wildlife.
3. If the long term plan for road maintenance includes counties than be sure to put into place uses that generate funds for counties to benefit from. USFS should not add to the county expenses and reducing activities that help fund counties.
4. Delta County supports increasing the size of reservoirs wherever possible.
5. Add maintenance of infrastructure to the list of broader issues

Recreation

1. Delta County encourages the USFS to maintain the current broad areas of use for recreation. If areas are too narrowly defined, additional conflicts will result.
2. Recreation should not trump all other uses as these are multiple use landscapes and evolved under disturbance driven events.
3. Public lands management seems to manage via the pendulum instead finding a balance. Be careful not to allow the management of recreation to go too far and becomes similar to the National Park Service.

Scenic Character

1. Vegetation treatments that are restricted result in large landscape events, i.e. fires and insect infestations. Do not be too restrictive in a rush to not look like anything has occurred. Lessons from the past and now should point to the mistakes of "loving something to death".

Rangeland Management

1. Do not move toward utilization and stubble height for rangeland management analysis. These tools do not measure rangeland health and are very poor indicators of management. Concentrate on existing language, data, monitoring trends and methodologies that are used by the GMUG to manage livestock and landscapes.
2. Concentrate on altering time and timing for livestock grazing to provide for the specific needs of the resource.
3. Suggesting that landscapes will return to natives by removing livestock is not substantiated by research. It is not appropriate to include generalizations like this in a Forest Plan Revision document.

Delta County looks forward to working with the GMUG staff as they work through the entire process.

Sincerely,

Delta Board of County Commissioners

C. Douglas Atchley, Chairman

J. Mark Roeber, Vice Chairman

Don Suppes, Commissioner