



DELTA COUNTY, COLORADO

BOARD OF COUNTY COMMISSIONERS

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May 24, 2018

USFS Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG)

Attn: Shane Walker

2250 South Main Street

Delta, CO 81416

RE: GMUG Plan Revision Scoping Document-Delta County comments

Delta County appreciates the opportunity to provide comment and will work with the GMUG as a cooperating agency during the Revision process.

Specific to the scoping comments:

Delta County concurs with Montrose County in requesting that the economic importance of the GMUG to local communities be specifically mentioned in the vision statement and supported throughout the entire document.

Delta County is fully supportive of Adaptive Management and Direction for the GMUG. Adaptive management should be defined in that it will allow for the monitoring to in part determine the direction. The push and tendency will be to make adaptive management prescriptive and that restricts the flexibility and the shared learning that cooperative monitoring can provide. Include in the adaptive management plan the flexibility to add the public as part of the joint monitoring of projects. Conservation biology principles and managing for ecosystems were part of the 2012 planning rule, however it would be important for the GMUG to include in the forest plan that it is the components of the ecosystems that are to be managed and that reasonable efforts will be made at the species level but there will be times when not every species in every location can be management priority.

Adaptive management should also be used across the other disciplines as well including recreation, timber and vegetation management. The efficacy of adaptive management depends on monitoring of indicators that provide information on trend. Without trend monitoring, there is almost no ability to learn if "the plan" actually had the intended impact. Monitoring is very important in terms of transparency and avoiding conflict. In addition to its critical role in informing adaptive management, monitoring can be a place where all parties can learn and participate.

Recreation is a driver on the GMUG and Delta County encourages recreation management in the Forest Plan, however it should not trump every other use on the landscape and the first bullet under social and economic sustainability indicates it will. Similar to zoning in a county not every use is going to be accommodated on every

acre, however the Forest Plan should set the tone that while recreation is important it is not put above the other uses to the detriment of other economic drivers.

Managing for scenery is a precedent that will be difficult to provide. The ecological potential of the landscape is the limit of the scenery and to constrain management to an interpretation of scenery is opening the door to misinterpretation and being used as a hammer. When the forest is managed for the conservation biological principles and at the ecosystem level, the scenery will be provided for.

Delta County agrees with the timber management direction and focus and encourages the same language to be used for livestock grazing.

Delta County agrees with the focus on increasing water storage through expansion but the emphasis should not be limited to just expansion. The need for water storage is going to increase and the flexibility to provide additional storage should be in the GMUG forest plan to address future needs. Both expansion and new construction should receive equal billing in the plan. The specific Overland Reservoir conundrum needs to be addressed in the Forest Plan to give the USFS the tools to address this self-inflicted quagmire.

Given the variety of concerns within in the various watersheds it will not be practical to have one plan for watersheds. Focus on adaptive management for the different watersheds that would include consistent management where appropriate.

Agree with adding major fiber optic lines and broadband infrastructure. Include the ability to maintain ROW without significant NEPA roadblocks and language that allows for perfection of easements.

Clarification that riparian areas are not a dominant ecosystem on the GMUG. They are important but in this area they are not a dominant feature.

Delta County is concerned that managing for not degrading air resources will be used as a means to stop or delay vegetation management projects that include fire. This bullet and focus should be reworded to allow for temporary degradation of air quality resources for long term forest health benefit. Timber management and harvest should be added here to improve long term air quality resources.

When maintaining diversity of plant and animal communities, Delta County recommends that vegetation management be included in the tools for providing for biodiversity. Too often these types of statements involve a preservation approach instead a combination of active and passive management. Specific to the fen ecosystem, see note above to add to the management options the ability to mitigate so that the Overland Reservoir can be expanded. Include language in the forest plan that minimizing wildlife and livestock conflict does not mean that the livestock are the mitigation tool of choice.

There is a significant number of existing areas with restrictions already in place such as Wilderness and Roadless. These areas should be the basis for requested quiet recreation, backcountry and habitat needs. This allows for greater flexibility and multiple-use on the remainder of the GMUG. The restricted areas provide a cumulative landscape that should be utilized to address the requirements of the Natural Processes, Special and Unique Landscapes and Backcountry.

Delta County looks forward to working with the GMUG through the entire Forest Plan Revision process.


C. Douglas Atchley, Chairman


J. Mark Roeber, Vice Chairman


Don Stippes, Commissioner