



DELTA COUNTY, COLORADO

Board of County Commissioners

Delta County Courthouse • 501 Palmer Street • Suite 227 • Delta, Colorado • 81416-1796

Phone: (970)874-2100 Fax: (970) 874-2114

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Dist. 1: Mike Lane - Dist. 2: Don Suppes - Dist. 3: J. Mark Roeber

Friday, June 13, 2019

United States Forest Service
Grand Mesa, Uncompahgre and Gunnison National Forests
ATTN: Plan Revision Team
2250 South Main Street
Delta, CO 81416

RE: Grand Mesa, Uncompahgre and Gunnison National Forests—Preliminary Draft Revised Land Management Plan

Dear Forest Plan Revision Team,

Thank you for the opportunity to provide comments on the Preliminary Draft Revised Land Management Plan. Delta County offers the following for your review and consideration.

Plan Features

The Preliminary Draft Plan includes several features that will allow greater administrative flexibility throughout the lifetime of the plan, and a greater ability for the GMUG to respond to changing conditions, technology, and user needs over the next 30 years. The County applauds this approach, supports these specific features and advocates for their inclusion in the final Plan.

- Management Approaches are delineated in the Plan, but are optional and may be changed administratively (pg. 4)¹
- Suitability criteria are inclusive rather than exclusive. In other words, projects or activities may occur in an area unless specifically identified as unsuitable. If the Plan is silent with respect to the suitability of a project, it is assumed to be suitable (pg. 3).

General Socioeconomics:

- **FW-DC-SCEC-01** (pg. 8) – This desired condition states that the GMUG will provide forest goods and services. However, it does not state that the GMUG will be actively managed to provide those goods and services, at levels sufficient to sustain local business, at levels commensurate with past provisions, or otherwise. The County advocates for language that recognizes the Forest Service’s active role in providing those goods and services, and that makes a commitment to do so.
- **FW-DC-PART-02** (pg. 8) – Lease and permit holders are not included in the list of partnerships and coordination that will be prioritized. In the interest of citizens and

¹ All page number citations refer to the page numbers of the “Grand Mesa, Uncompahgre, and Gunnison National Forests - Preliminary Draft Revised Land Management Plan” released April 2019 to cooperating agencies only, and not to the public.

businesses that hold leases or permits on the GMUG, the County would like to see them included, so that the informal coordination that the GMUG currently practices with lease/permit holders will be formalized in the Plan.

- **FW-DC-AQ-05** (pg. 9) – The Plan identifies air-quality preservation in Class I Wilderness Areas as a priority, and specifies that visibility be set on a path towards natural conditions. The County is concerned that air quality management for the West Elk Wilderness (a Class I Area) has the potential to impact and restrict agricultural activities off of the Forest, including ditch burning, tilling, harvesting, and other activities that produce incidental particulate air matter. Although these activities take place primarily on private land, much of the water and water infrastructure used to support the agricultural activity is on GMUG land, and is therefore subject to Forest Service approvals for construction, maintenance, and repair. The County recommends the inclusion of language that specifically addresses and exempts normal agricultural activities from consideration. The County is also concerned that activities on lands or dust from area far outside the Forest boundary (such as private and BLM lands across western Colorado and eastern Utah) would therefore preclude any additional activities on Forest lands within Mesa County which may create additional particulate generation (such as timber harvesting, prescribed fire, oil and gas exploration and development). The stipulations of a Class I airshed are effectively making it such that any additional activities on Forest lands could be denied based on hazy conditions in the West Elk Wilderness.
- **FW-GDL_AQ-11** (pg. 10) – The Plan identifies air-quality preservation in Class I Wilderness Areas and specifically references oil and gas projects as items of concerns with regard to critical pollutant loads. The County is concerned that air quality management for the West Elk Wilderness (a Class I area) has the potential to preclude oil and gas development in the North Fork Valley areas, and to restrict development in other nearby areas such as the Collbran Valley.
- **FW-OBJ-ENMI-171** (pg. 38) – The Plan proposes to revise oil and gas leasing within 3 years. The County supports the goal of completing the revision as quickly as possible, to provide regulatory and operational certainty to oil and gas operators and to encourage investment in local energy resources.
- **Ongoing Monitoring** (pg. 63) – The plan proposes a regular and comprehensive monitoring program to track performance and evaluate management prescriptions. This monitoring includes items of great interest to the County, including public use and benefit of the forest, and the provision of forest goods. However, there does not appear to be an inclusion of grazing performance and provision in the monitoring plan. The County is concerned that existing grazing permit holders be considered in this process, and that economically-viable grazing operations on the GMUG be allowed to continue. In addition, the County would like to have an opportunity to contribute data to the biannual monitoring efforts, specifically with regards to economic activity such as tourism trends and tax receipts for forest-dependent businesses.

Access & Management:

- **FW-OBJ-TEV-16** (pg. 12) – This Objective stipulates that “climate refugia” will be identified and monitored. The County is not in support of additional land management designations that entrain additional restrictions and redundant regulation and contends that

existing management plans and designations are adequate to provide functional equivalency (e.g., Wilderness Areas, Roadless Areas).

Water Quality & Water Development Comments:

- **FW-STND-RMGD-34** (pg. 15) – The County is not in support of the riparian management framework which identifies a protective zone extending across the entire “inner gorge” of perennial and intermittent streams. In many cases (e.g., recently-glaciated valleys, mature floodplains) the “inner gorge” as defined could extend for large distance from the stream, far more extensive than the typical 100ft-200ft protective buffers typically used for stream protection. This blanket application could have the effect of curtailing most or all surface-disturbing activities in large portions of the GMUG (see next comment).
- **FW-STND-RMGD-35** (pg. 17) – The restriction on all activities that do not maintain or improve long-term stream health within the riparian management zone could preclude large numbers of economically-important activities, including water diversions, grazing management, road construction, timber harvest, and so forth. At a minimum, the County suggests that the restriction should be limited to those activities that demonstrably harm water quality, and/or provide the ability to minimize and mitigate potential impacts.
- **FW-DC-WTR-131** (pg. 32) – The County appreciates and approves of the Forest Service’s commitment to work with stakeholders to provide water supplies to surrounding communities. Given the water quality challenges created by the natural soil conditions in our region, local water suppliers and utilities are equally concerned about the protection of water quality as they are about water supply. The County suggests amended language to highlight the role that stakeholders have in water quality issues, as well as supply concerns.

Wildlife & Biological Concerns

- **FW-GDL-SPEC-83** (pg. 25) – This guideline suggests that no disruptive activities should be authorized in big game severe or critical winter range or in production areas. The language is not clear as to whether the restriction applies only to the winter use of the areas, or to the use of these areas generally. In addition, the blanket restriction does not allow for a more nuanced, project-specific consideration of impacts and potential minimization/mitigation measures. CPW’s winter range mapping efforts are often done at a high-level and are acknowledged by CPW as being very coarse; attaching strict regulatory guidance to coarse mapping efforts commonly creates confusion and frustration, and the County does not support attaching regulatory guidance to admittedly coarse maps. In general, the County is not in support of management prescriptions that apply universal restrictions on development, with no opportunity to consider mitigating factors.
- **FW-GDL-SPEC-84** (pg. 26) – This guideline suggests that “30-100% of a sub-watershed should provide wildlife security habitat.” It is unclear what this means, how it would be measured, or what the practical outcome would be. However, the County is concerned at any management guideline that proposes to place up to 100% of a given watershed under restrictive management, and requests additional clarification on this item.
- **FW-GDL-SPEC-85** (pg. 26) – This guideline suggests that no heavy equipment should be allowed to operate within 1.6 miles of boreal toad breeding ponds, except under snow-covered or frozen conditions. This statement should be amended to clarify that it applies to

known “occupied” habitats, and not to habitats that have a potential to be occupied, either currently or in the future. Regardless of this clarification, however, the County is concerned because this amounts to a de facto ban on all construction in these areas, since heavy equipment operation is generally not feasible in winter on the GMUG. For example, this guideline would effectively preclude timber harvest or oil and gas development within 1.6 miles of these breeding ponds. It would also preclude water developments. Further, this stipulation only addresses heavy equipment use, which is not a significant driver in boreal toad population declines. Fungal infections are generally considered to be responsible for the species’ declining populations. The County is not in support of a management policy that would so drastically limit potential activities on the forest, in the absence of more information about the number and extent of these breeding ponds, and which appears to be reactionary while not addressing actual cause and effect issues related to boreal toad declines.

Recreation

- **Travel Management** – The County recognizes that travel management is not a part of this Plan revision. However, the County does wish to re-emphasize the continued commitment to providing public access to the GMUG, and is not in support of management goals or targets that would lead to additional route closures at a later time.
- **Motorized Recreation** – The County is aware of some conflicts between ATV users and UTV users. ATV trails have been developed and designated for vehicles of 50” in width, but UTVs represent a new vehicle category that is intermediate between full-size vehicles and ATVs, typically 54-72” wide. There is no specific designation for these vehicles, and although they are nominally limited to jeep roads currently, there are consistent reports that the UTVs use ATV trails, damaging the trails and negatively affecting users and resources in the process. The UTV vehicle category should be addressed in the Plan revision, either by explicitly including them in the full-size vehicle category or by creating a new vehicle category for them.

Range

- **FW-STND-RNG-201** (pg. 42) – This standard stipulates alteration of grazing practices or management direction if grazing objectives are not met. Grazing objectives include metrics such as canopy cover, vegetation response to grazing, etc. The County is concerned that the standard does not stipulate “if grazing is determined to be the causal factor for non-attainment through quantitative measurement” or similar language. As currently written, this standard could be used to alter grazing practices based purely on measured conditions, without confirming that grazing practices are responsible or that reduced grazing would ameliorate the issue.
- **FW-GDL-RNG-206** (pg. 43) – This guideline suggests that grazing should be limited and rotated “to allow plants time to recover (grow).” The County suggests that simple plant growth is an overly restrictive interpretation of rangeland health, and suggests that the language be altered to a more flexible and general goal such as “to improve rangeland health and resiliency” or similar. For example, in grazing allotments where undesirable vegetation is increasing in abundance, proper management may include targeted grazing pressure to reduce vegetation abundance. The proposed revision would allow scope for such situations.

- **FW-OBJ-RNG-198** (pg. 42) – This objective suggests annual assessment and adjustments to grazing “when necessary to respond to changing ecological conditions or resource concerns.” As previously stated, the County is concerned that this language does not include a stipulation to the effect of “if grazing is determined to be the causal factor for non-attainment through quantitative measurement.” As currently written, this objective could be used to justify altered and/or reduced grazing practices based on external objectives for resources other than rangeland health, without confirming that grazing practices are responsible for the identified issue, or that reduced grazing would ameliorate the issue.

Timber

- **Suitable Timber Areas** (pg. 175) – The County supports the Forest Service’s proposal to increase the suitable timber acreage on the GMUG, in recognition of the need for more proactive fuels and forest health management, ecological restoration, and modern harvesting techniques and new technology.
- **Salvage vs Green Wood Timber Sales** (pg. 178) – The County supports the Forest Service’s proposal to prioritize salvage timber sales in the initial years of the plan. Beetle-kill lodgepole and spruce degrade within 5-7 years and lose their value for dimensional lumber. It is not clear from the analysis, however, whether the projected salvage sale (Table 25) of between 1000 and 4000 acres per year would include the majority of the harvestable salvage timber on the GMUG, and what percentage would still be viable for dimensional lumber products. The County advocates that all salvage timber in suitable locations should be available for sale, while taking into consideration the supply needs of local dimensional lumber and whole-log timber processors. A five-year plan of predictable, large volume salvage timber sales would help provide business certainty for the forest products businesses in the region.

Thank you for your consideration of these comments. If you have any questions, please contact Robbie LeValley, County Administrator, at 970-874-2100

Sincerely,

Delta Board of County Commissioners



Don Suppes – Chair
District 2



Mark Roeber – Vice-Chair
District #3



Mike Lane- Commissioner
District #1