



Promoting the wise use of all natural resources

August 31, 2022

Curtis Keetch, District Ranger
c/o Christopher McDonald
220 E. Market Street, Meeker, Colorado 81641

Subject: Yellow Jacket Project

Dear Mr. Keetch,

Thank you for the opportunity to provide comments on the EA and draft FONSI for the Yellow Jacket Project in the Blanco Ranger District. As noted in the previous scoping comments, the White River and Douglas Creek Conservation Districts (Districts) support and strongly encourage the implementation of silviculture practices to improve the health of the forest and watershed. The Districts support alternative #2 that will authorize approximately 2,300 acres of vegetation management activities, two road realignments, and material source development to maintain and repair existing roads in the area.

The Districts are political subdivisions of the State of Colorado with authorities, powers, and structure contained in the Colorado Revised Statutes, Title 35, Article 70. The Districts promote the wise use of natural resources and address rangeland health, wildlife, forest health, water, and soil erosion through information, education and technical assistance. The Districts work and partner with local, state, and federal/national entities to implement on-the-ground conservation utilizing local expertise and knowledge.

The two Districts include private and public lands within Rio Blanco County, Colorado. Approximately seventy five percent (75%) of the land mass is publicly managed, with the Blanco Range District managing 352,917 acres.

In July 2022, the Rio Blanco County Board of County Commissioner, along with the White River and Douglas Creek Conservation Districts adopted the updated 2022 Rio Blanco County Land and Natural Resources Plan and Policies (“LNRPP”). Pursuant to §30-11-101(k) C.R.S., and the following federal statutes, policies and rules: 43 U.S.C. § 1712, the National Environmental Policy Act of 1969, 42 U.S.C. § 4321 et seq., 40 U.S.C. § 3312, 16 U.S.C. §530, 16 U.S.C. §1604, and 40 C.F.R. parts 1500 to 1508, Colorado county governments have the authority to coordinate with the United States Secretary of the Interior and the United States Secretary of Agriculture to develop land management plans that address hazardous fuel removal and other forest management practices, water development and conservation measures, watershed protection, the protection of air quality, public utilities protection, and private property protection on federal lands within such county’s jurisdiction. Thus, based on these statutory authorities, the policies and powers of Rio Blanco County and the White River and Douglas Creek Conservation Districts encompass the obligation to protect the customs and culture of the local citizens, to

provide for community stability, and to protect the natural environment and resources. As required by the current National Environmental Policy Act and other federal statutes, federal agencies are required to give meaningful consideration to policies asserted in plans developed by local governments.

Succinctly stated, the primary reason for local governments to develop a Land Use Plan is to ensure the local socioeconomic wellbeing, the culture and customs of the constituents, and conservation of natural resources are considered in the federal decision-making process. To review this document in its entirety, please contact the Districts' office or visit their website at wrcd-dccd.colorado.gov.

Timber harvesting is in accordance with the Rio Blanco County Land and Natural Resources Plan and Policies (Plan) for public lands in Rio Blanco County. Please see the full section (Section 4.4) on Forest Management, Wildfire, and Community Wildfire Planning on pages 19 – 27. Below are specific policies supporting timber harvest.

4.4.3 Policy Statements:

- #4. The reduction of fuels through silviculture and livestock grazing is necessary. Proactive management practices such as selective timber harvest and thinning, livestock grazing, and prescribed burns on federal lands will encourage ecosystems with varied age classes and successional states that support a variety of species and uses (including watershed improvement improved wildlife habitat), and decrease the risk of catastrophic wildland fires and disease.
- #5. Long-term (i.e., 20-year) timber harvest leases, based on local market value, are important to allow private industry to take the financial risk and make an investment in the infrastructure necessary to maintain the timber industry and forest health in the County.
- #6. Increased timber harvests (above the 425,000 acres identified in the 2002 WRNF revision) should be analyzed in the next forest plan update to improve the economic viability of logging in the County and improve forest condition.
- #19. Management must focus on watershed health for all public land.
- #20. Support forest thinning and burning to improve watershed health.

In addition to the above information, the White River Integrated Water Initiative has identified upland vegetation management as one of the priorities for ensuring a healthy White River. This is a locally led community-based initiative with a mission to, “identify actions promoting a healthy river that ensures a vibrant economic community capable of securing the future vitality of agriculture, fisheries, recreation, municipalities, and industry while protecting water rights, quantity, and quality with respect for the local customs, cultures, and property rights”. One of their four priorities is to “Protect and enhance water quantity and quality through promoting best management practices for forest health.” The Yellow Jacket Project Alternative #2 will support the mission and priorities of this group.

Thank you again for the opportunity to provide support for alternative #2 that will authorize approximately 2,300 acres of vegetation management activities, two road realignments, and material source development to maintain and repair existing roads in the area. Please contact the District office at 970-878-9838 with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Marc Etchart', with a stylized flourish at the end.

Marc Etchart, Vice President
White River Conservation District

A handwritten signature in blue ink, appearing to read 'William R. Hume', with a stylized flourish at the end.

Bill Hume, President
Douglas Creek Conservation District