



Board of County Commissioners
Matt Salka, Chair
Marsha Porter-Norton, Vice Chair
Clyde Church, Commissioner

ACCOUNTABILITY · INTEGRITY · RESPECT

1101 East 2nd Ave
Durango, CO 81301
(970)382-6219

February 23, 2024

Columbine Ranger District
P.O. Box 439
367 Pearl Street
Bayfield, CO 81122

RE: Spring Creek EA Comments

Dear Mr. Glidden,

La Plata County has reviewed the Draft Environmental Assessment (EA) for the *Catamount Spring Creek Pipeline and Associated Fruitland Coal Gas Drilling Projects – Draft Environmental Assessment #63036*. As stated in the comment notice, “The proposed action is the Forest Service approval of a Surface Use Plan of Operations for expansion, operation, and maintenance of the existing Pargin Mtn Ut #2 (API#: 05-007-06098) well pad; Forest Service issuance of a Special Use Permit (SUP) for construction, operation, and maintenance of the 8.4 mile natural gas and produced water pipeline system; Forest Service issuance of a permit for road reconstruction, use, snow plowing, and maintenance; BLM issuance of Sundry Notice for the recompletion of the existing Pargin Mtn Ut #2 CBM well; BLM approval of seven Applications for Permit to Drill for new CBM wells from the existing Pargin Mtn UT#2 well pad. The entire proposed action is located on SJNF lands.”

After review of the Draft EA, La Plata County Board of County Commissioners (the “Commission”) requests additional consideration in the following areas of concern.

1. Water – Public input by the San Juan Citizens Alliance (SJCA) has identified two domestic water wells within the 1,000. The Commission supports the SJCA request for these residential wells to be included in the Final EA and to site the proposed pipeline to minimize risks to these resources.
2. Water Influence Zone (WIZ) – The project area overlaps a WIZ (defined as the zone located on either side of a stream that is 100 feet in width). Additional protections are required within the WIZ, however portions of the pipeline fall within this protected area. The Commission requests additional planning (i.e., a Storm Water Management Plan or other mitigation measures) is done in order to ensure there are not short- or long-term negative impacts to the WIZ.

3. Vegetation (invasive species) – The Draft EA identified that invasive species would be treated on an annual basis. Additional measures should be considered in accordance with La Plata County’s Weed Management Program.
4. Wildlife – The Commission relies on Colorado Parks and Wildlife (CPWs) for their expertise in impacts land disturbing activities has on the local wildlife. The Commission echoes CPWs concern in their comment letter submitted January 9th, 2024 surrounding the impacts the proposed development would have on the elk and mule deer wintering habitat and the need for habitat enhancement equal to or greater than the acreage disturbed by development. The Commission concurs that a prohibition of construction activities between December 1 and April 30 will minimize disturbance when big game are most vulnerable, and the reductions in surface disturbance from the proposal will benefit the elk and mule deer population. In addition, CPW calls for a “raptor nest survey to be conducted within 0.25 miles of the well pad and pipeline ROW when the ROW is in forested areas” which is supported by the Commission.
5. Noise – The Commission is concerned that the noise during construction as well as long term operations will not only negatively affect the wildlife, but will also deter from the recreational components of the USFS land.
6. Soils/ Landslides – The proposed land disturbance is located in areas with a high potential for landslides and mass wasting (the movement of rock and soil down slopes under the force of gravity).
7. Spring Creek Archaeological District – As stated in the Draft EA, “the proposed pipeline crosses the Spring Creek Archaeological District. The District was nominated to the National Register of Historic Places in 1983. The District has an extensive period of occupancy, possible beginning as early as 300BC and extending through the Basketmaker and Pueblo periods of the Ancestral Puebloans and into the proto-historic Athabaskan and Ute Indian occupancy”. The Commission is concerned that increased disturbance in the Archaeological District could jeopardize the integrity of the area and artifacts. The proposed project should avoid construction in this district.
8. Fire Mitigation – The Commission is recommending additional measures to ensure adequate fire mitigation. It is recommended a 200’ circumference of cleared vegetation surrounding well and oil pads and clearance of vegetation in the pipeline easement be included on future submittals. In addition, areas cleared of vegetation should be maintained in this condition for the duration of proposed uses.


We appreciate the opportunity to provide comment. Please reach out if you have any questions or would like to discuss our comments.

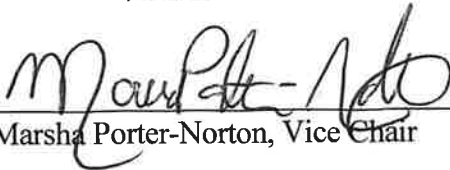
Sincerely,

ATTEST:


Clerk to the Board

BOARD OF COUNTY COMMISSIONERS
LA PLATA COUNTY, COLORADO


Matt Salka, Chair


Marsha Porter-Norton, Vice Chair


Clyde Church, Commissioner

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