

Promoting the wise use of all natural resources

P.O. Box 837
351 7th Street
Meeker, CO 81641
(970) 878-9838

April 16, 2024

Blanco District Ranger
Attn: Andre Delcalzo
220 E. Market Street
Meeker, CO 81641

RE: Southwest Blanco Wildlife Habitat Enhancement Project (SBWHEP) NEPA EA

Supporting documents:

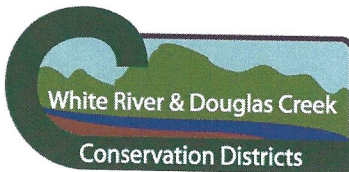
2002 White River National Forest Land and Resource Management Plan (WRNF LUP)
2022 Rio Blanco County Land & Natural Resource Plan and Policy (RBC LUP)

Thank you for the opportunity to provide input on the Southwest Blanco Wildlife Habitat Enhancement Project (SBWHEP) NEPA EA.

The Districts are political subdivisions of the State of Colorado, made up of locally elected officials whose special expertise is to provide leadership in the wise use of the natural resources within the Districts' boundaries. The Districts' authorities, power, and structure are contained in the Colorado Revised Statutes, Title 35, Article 70.

Conservation districts in Colorado are defined as "local governments" thus have the responsibility to participate in government-to-government interactions with the federal agencies. The Districts within Rio Blanco County have developed the Land & Natural Resource Use Plan and Policy (LNRUPP) to translate our statutory mandate (Colo. Rev. Stat. § 35-70-108) into land management policy and direction guided by local landowners. One of the Districts' responsibilities is: "To prepare a plan for the care, treatment, and operation of the lands within the district." Colo. Rev. Stat. § 35-70-108(1)(k). Additionally, Colorado conservation districts were created by the state legislature to provide for constructive methods of land use providing for the conservation of natural resources, including adequate underground water reserves, the control of wind and water erosion, and the reduction of damage resulting from floods. The purposes of the conservation districts are to "insure the health, prosperity, and welfare of the state of Colorado and its people . . ." Colo. Rev. Stat. § 35-70-102.

Purpose: *To make available technical, financial, and educational resources, whatever their source, and focus or coordinate them so that they meet the needs of the local land manager with conservation of soil, water, and related natural resources.*



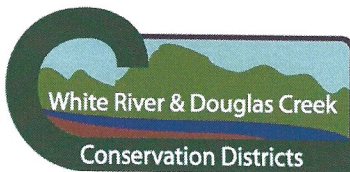
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The Districts support this project as it benefits wildlife and other multiple uses.

1. SBWHEP NEPA Page 34, Appendix A – Preliminary Project Design Criteria. Reference Wildlife. RBC LUP pg. 97, Section 4.15 Wildlife Management, Policy Statement 4.15.3 #1 Create wildlife management objectives based on the carrying capacity of the habitat including all multiple use mandates (livestock grazing, mineral extraction, wild horses) on federal land.
While the Districts support the wildlife section of the project design criteria table (raptor, migratory birds, elk, snags and woody debris), the Districts are also looking at this from a point of not only managing the mentioned wildlife, but also how this plan can support multiple uses of the land to benefit wildlife. Specifically, to consider minimizing the impacts to livestock grazing. What is good for wildlife is also good for improving the amount of feed for livestock. RBC LUP pg. 28 Section 4.4 Forest Management, Wildfire, and Community Wildfire Planning, Policy Statement 4.4.3, #11 Managed livestock grazing is an appropriate and important management tool for revegetation and fuels reduction.
2. SBWHEP NEPA pg. 14, Purpose and need for Action “The purpose of the proposed action is to improve wildlife habitat by creating a mosaic of vegetation conditions...”
RBC LUP pg. 97, Section 4.15 Wildlife Management Policy statement 4.15.3, #6. Encourage habitat improvements on federal lands that increase forage to reduce private land conflicts with wildlife in consultation with the County, Districts, and permittees.
The proposed Habitat Improvements of creating a mosaic of vegetation conditions will help reduce private land conflicts with wildlife.
3. SBWHEP NEPA Page 34, Appendix A – Preliminary Project Design Criteria. Reference Wildlife. RBC LUP pg. 34 Section 4.5 Livestock Grazing policy statement, 4.5.3 #3d. Rangeland Improvement Projects: Installation of wildlife-friendly range improvements (e.g., Wildlife-friendly fence, bird ramps in tanks) are an important component of range improvements.
The Districts encourage you to work with Colorado Parks and Wildlife (CPW) Grazing Committee and the Districts in rangeland improvements that would also benefit wildlife in these areas. RBC LUP, pg. 27-28, Policy Statements 4.4.3 #4-8
4. Page 14, SWBHEP NEPA EA, Management Direction, Forest Plan Goals & Objectives. Goal 1 Ecosystem Health, and Objective 1d, Strategy 1d7 and Strategy 1d9 and Goal 5, Public Collaboration.
The Districts encourage you to add additional goals from the 2002 WRNF LUP to support the Habitat Improvement aspect of the management plan.
 - a. *INCLUDE from 2002 WRNF LUP pg. 22, Objective 1c ‘Help ensure viability of species of concern for the White River National Forest’ and Strategy 1c.1 ‘Develop and implement management strategies needed to support desired population levels and trends for species identified as having a viability concern’.*
 - b. *INCLUDE from 2002 WRNF LUP pg. 21-22, Objective 1b ‘Provide ecological conditions to sustain viable populations of native and desired nonnative species and to achieve objectives*

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for Management Indicator Species (MIS)'. Strategy 1b.4 'within 15 years, demonstrate positive trends in habitat availability, habitat quality or other factor affecting sensitive species and MIS'.

- i. 1982 National Forest Management Act require that MIS be identified as part of the forest plan. Each forest plan must establish objectives that maintain and improve habitat for MIS (1982 rule provision 219.19(a)). Population trends of the MIS will be monitored and relationships to habitat changes determined (1982 rule provision 219.19(a)(6)).
- ii. RBC LUP pg. 28 Section 4.4 Forest Management, Wildfire, and Community Wildfire Planning Policy Statement 4.4.3 #18. Coordinate with the County and Districts to select and describe Management Indicator Species and their role in determining forest health.
- c. *For further reference to support adding Objective 1c and Objective 1b* is SWBHEP NEPA EA, Desired Condition, pg.2. states "the habitat required for minimum viable populations of both elk and mule deer should be comprised of approximately 60% forage habitat and 40% cover habitat". "The habitat types across the project area are on average 40% forage habitat and 60% cover habitat".
- d. *For additional reference to support adding Objective 1c and Objective 1b* is SWBHEP NEPA EA, Purpose and Need for Action pg.14, 'the purpose of the proposed action is to improve wildlife habitat by creating a mosaic of vegetation conditions.

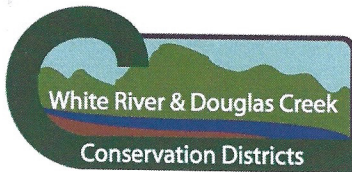
SBWHEP NEPA Proposed Action pg, 15, 'the project would not exceed 500 acres of mechanical, hand and weeding treatments per year.

The Districts respectfully request striking sentence in '500 acre limitation' so you can manage as much as you can on annual basis.

Based on the above information, the Districts support the enhancement project to manage mountain shrub and aspen communities with vegetation management techniques including mechanical treatment, prescribed fire, hand treatments, seeding/planting, and rehabilitation, but request adding more information and 2002 WRNF LUP goals as it pertains to Wildlife Habitat Enhancement and striking the 500 acre per year treatment limit.

In addition, the Districts ask for an earlier engagement in the future for all NEPA scoping processes based on the following policy statement from the Rio Blanco County Land and Natural Resources Plan and Policies. RBC LUP, pg. 6, Section 2.3 Land Use Planning Process and Legal Framework Policy Statement 2.2.3, The National Forest Management Act (NFMA), which governs the US Forest Service (USFS), requires the agency to "coordinate," to encourage local governments to seek cooperating agency status and to consider a 'consistency review'.

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[T]he Secretary of Agriculture shall develop, maintain, and, as appropriate, revise land and resource management plans for units of the National Forest System, coordinated with the land and resource management processes of State and local governments and other Federal agencies (16 U.S.C. § 1604(a); see also 36 C.F.R. §219.4(1)).

The fact that the USFS is directed to "coordinate" with local governments implies, by its plain meaning, that the USFS must engage in a process that involves more than simple "considering" the plans and policies of local governments; it must attempt to achieve compatibility between USFS plans and local land use plans. (36 C.F.R. §219.4(b)(2)(i)-(iv)).

Thank you for the opportunity to provide input on this NEPA EA. Please contact our office at 970.878.9838 with any questions.

Sincerely,

Chris Collins, President
White River Conservation District

Rosaly Coombs, President
Douglas Creek Conservation District

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