

May 9, 2018

Delta County Planning Commission Delta County Commission 501 Palmer Road, Suite 115 Delta, CO 81416

RE: Draft Master Plan Revision Comment

Dear Planning and County Commissioners:

The Western Slope Conservation Center submits these comments regarding the draft Delta County Master Plan on behalf of the staff, Board of Directors, and 600 current members. The Delta County Master Plan is an incredible opportunity to set in place guiding principles and values which, if done thoughtfully, could ensure long-term sustainable stewardship of our most cherished lands, water, air, and wildlife for generations to come. The Conservation Center recognizes the remarkably high quality of life our members enjoy in Delta County, and we will continue to support planning and decision making at all levels that conserves our natural resources as well as quality of life for the communities of the Western Slope.

The Conservation Center thanks the Planning and County Commissioners, along with Delta County staff and contractors, for the significant amount of time, energy, and attention they have devoted to the Master Plan and Master Trails Plan process to date. These resources will pay dividends if we as a county can finalize and implement sustainable land use guidance. It is with these sentiments in mind that we submit the following comments on the draft Master Plan document:

Water and Air

We understand that the Master Plan is a guiding document, but it does not yet adequately address the challenge of protecting the health, safety and welfare of county residents from water demands and impacts of agricultural, commercial, and industrial development. Sufficiently large setbacks from existing neighboring properties is one method to protect neighboring property values and the health and welfare of existing neighbors. We strongly support buffers and setbacks for large-scale development of all kinds, with Concentrated Animal Feeding Operations and Oil and Gas wells being the two most concerning at this moment in time.

We hope that the upcoming working groups along with corresponding land use recommendations, stipulations, or zoning will include more specific buffers or setbacks for mitigating future conflicts from water and air quality impacts. In the Master Plan, we recommend additional language that specifically identifies the need to protect water and air quality, not just water quantity, whether it be for commercial, agricultural, or residential use. Similarly, we believe the Master Plan should include language regarding ensuring the health and welfare of existing county residents and their properties from potential impacts on existing neighboring properties from new commercial, agricultural, and residential development.



We believe water and air quality will continue to pose increasing concern to the health, welfare, and quality of life of Delta County residents over the coming years. These concerns are based on acute developmental pressures as well as larger state and regional trends, as evidenced in CO Department of Health and Environment Air Quality Technical Documents and Reports https://www.colorado.gov/airquality/tech doc repository.aspx>.

Agriculture and Economy

The Conservation Center believes that preserving open space and existing irrigated agricultural land should be an explicit priority along with preserving agriculture more generally. Industrial-scale animal production facilities that close off open space and reduce useful irrigated land run counter to preserving agriculture and often denigrate/diminish water and air quality. Along with water quality concerns already mentioned, we encourage the county to provide more specific land use restrictions through future land use planning processes in order to safeguard against impacts to open space and agricultural practices from industrial-scale agriculture and commercial operations.

We also recommend that the final Master Plan provide a clearly stated vision for an economy that integrates tourism, recreation, agriculture and industry to steward our resources and provide employment opportunities for future generations. Agricultural development by new or changed operations should not be able to harm existing neighboring properties. Additionally, promotion of tourism, including agritourism, as well as preserving the agricultural heritage of the county should also be a stated goal.

Public Lands and Wildlife

The county has acknowledged during the Master Plan process that it must work closely with public lands agencies in order to ensure protection for wildlife and the remarkable public lands on which they depend. The Conservation Center recommends explicit language in the final Master Plan that acknowledges this management cooperation. The draft Master Plan identifies agriculture as the backdrop of the county. We believe that it is our public lands that are truly the backdrop of Delta County as well as the foundation for our agriculture and economic well being.

The draft Master Plan includes language regarding energy and recreation as primary drivers of economic development on public lands. While both of these will surely play a role in the future of the economy of Delta County, both can also have permanent and negative impacts on our public lands and as well as the county as a whole. As the Draft Master Plan points out, 56% of the county is public open space. The county has a critical role to play in making sure that those public lands do not become fragmented islands of habitat for big game and other wildlife. If large-scale energy and/or recreation development is allowed to occur on our public lands, it will create significant barriers for animals to move across our valley in historic migrations patterns. It is critical that the needs of the wildlife be considered in all development plans, and that the various federal, state, and county plans coordinate with each other. This will require mapping and protection of corridors across farms and ranches as well as future commercial, agricultural, and residential development areas.



The Conservation Center recommends including additional language that identifies and designates wildlife corridors and key habitat areas across the county, both on public and private lands. Healthy local wildlife improves community well being, quality of life, and adds to Delta County economy through hunting and tourism. This would an innovative action that would assure the overall vitality of the wildlife that is so important to the rural character of Delta County.

Trails and Recreation

The Conservation Center has engaged in the Trails Master Plan and is appreciative for all of the time and resources that the county has devoted to this concurrent process. Even so, we recommend including a goal in the Master Plan for the development and implementation of plans to improve recreational opportunities through the thoughtful development of hiking trails, bikeways and access to hunting, fishing and boating potential on federal and county lands.

We support the proposed future projects at the Paonia High School/Middle School, including the Grand Avenue crossing infrastructure improvements and creation of the hiking trail loop system. This infrastructure is necessary to ensure the safety of River Park users and students who travel to/from the High School and Middle School. Additionally, creation of the trail system at the high school property along the North Fork of the Gunnison will give students and community members access to more trails close to town and greater connection with the outdoors.

The Conservation Center also supports the creation of a Paonia River Trail Corridor Interest Area that connects the community with the North Fork of the Gunnison and its associated riparian areas, while respecting private property rights and maintaining wildlife habitat. The Paonia River Park is a prime example of a healthy riparian corridor that allows users to explore the riparian area with minimal impacts to wildlife habitat. We support seasonal closures to any new trails along the Paonia River Trail Corridor. The Paonia River Park is extremely popular with the community and many residents express an interest in expanding the trail system to connect the Paonia Library to the trestle bridge across the North Fork of the Gunnison at the old Bowie Coal Loadout facility. This would include the proposed trail system at Paonia High School (see attached maps). Expanding the trail system along the North Fork of the Gunnison in a manner that protects wildlife habitat should be a priority for the Delta County Trails Master Plan.

The Conservation Center supports improved access to river recreation opportunities along the North Fork and Gunnison Rivers. We have been working with Delta County for several years to improve the boat ramp at the Delta County Fairgrounds in Hotchkiss and are happy to see this as a priority in the Trails Master Plan. We plan to continue our work with the County and all project partners to ensure timely completion of this project.

In addition, we want to ensure that all future proposals to create new trails consider the impacts to wildlife and habitat in Delta County. Specifically, the Western Slope Conservation Center is concerned about impacts to wildlife within the identified Elephant Hill and McDonald Mesa Interest Areas. These areas are already identified and managed as prime habitat for elk and mule



deer populations. We support historic and existing uses in these areas, and will encourage the BLM and USFS to limit any future motorized or mechanized route development in all areas that overlaps important elk and deer habitat. Similarly, we support careful management of the existing Jumbo Mountain trail system, including possible seasonal closures, for wildlife.

Transportation

The Master Plan states that "rail infrastructure is available along the North Fork of the Gunnison River corridor and passes through four municipalities as well as through the historic townsite of Lazear. Most of the track through this designation runs along the highway, the river, and agricultural land." The Conservation Center recommends explicit language that prioritizes the current railroad infrastructure for goods and rail mass transit along Hwy 92 to minimize air pollution, safety risks, and upkeep costs as the county population and economy grows.

Conclusion

In the draft Master Plan, the Land Use and Development section states "Delta County's land use processes will be fair, predictable, defensible and easily understood. Growth and development in the county supports the community's desired future while enhancing overall health, quality of life and fostering innovation." We strongly support this statement, and wish to continue to engage our members and the communities of Delta County in county planning efforts. Thank you for making this historic planning process happen. We look forward to continuing our engagement with land planning in Delta County.

Sincerely,

Alex Johnson
Executive Director
Western Slope Conservation Center
PO Box 1612
Paonia, CO 81428
970-527-5307x201
www.westernslopeconservation.org