



COLORADO

Department of Natural Resources

Executive Director's Office
1313 Sherman Street, Room 718
Denver, CO 80203

December 8, 2017

Grand Mesa, Uncompahgre, and Gunnison
National Forests
Attn: Plan Revision Team
2250 South Main Street
Delta, CO 81416

RE: Colorado Department of Natural Resources Comments on GMUG Draft Assessment Reports

Dear Grand Mesa, Uncompahgre, and Gunnison Forests Planning Staff:

Thank you for the opportunity to submit comments on the draft Assessment Reports for the Grand Mesa, Uncompahgre, and Gunnison (GMUG) Forest Plan Revision. We appreciate your willingness to collaborate early on in this process and look forward to continued coordination with you.

The Colorado Department of Natural Resources submits the following comment letters prepared by two of our divisions: Colorado Parks and Wildlife (CPW) and the Colorado Water Conservation Board (CWCB). CPW and CWCB have provided both general comments encouraging the reference of other background and planning documents and specific comments in reference to a particular Assessment report.

CPW has provided specific comments on the following draft Assessment Reports:

- Benefits to People: Assessing Multiple-Uses, Ecosystem Services, and the Socio-Economic Environments
- Recreation
- Terrestrial Ecosystems: Integrity and System Drivers and Stressors
- Aquatic and Riparian Ecosystems
- Rangeland Management
- Renewable and Nonrenewable Energy Resources, Mineral Resources, and Geologic Hazards

CWCB has provided specific comments on the following draft Assessment Reports:

- Designated Areas
- Watersheds, Water, and Soil Resources

We look forward to working with you throughout the forest planning process. If you have any questions, please contact myself at 303-866-3311 or division contacts.

Sincerely,

Amy Moyer
Assistant Director for Water





COLORADO

Parks and Wildlife

Department of Natural Resources

Southwest Region Office
415 Turner Drive
Durango, CO 81303
P 970-375-6702 | F 970-375-6705

December 8, 2017

Grand Mesa, Uncompahgre and Gunnison National Forests

Attn: Plan Revision Team

2250 South Main Street

Delta, CO 81416

gmugforestplan@fs.fed.us

Dear Plan Revision Team:

Thank you for the opportunity to participate in the Assessment Phase of the Grand Mesa Uncompahgre Gunnison National Forest (GMUG) Plan Revision project. Colorado Parks and Wildlife's (CPW) statutory mission is *to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources.* This mission is implemented through our 2015 Strategic Plan¹ and the goals it embraces which are designed to make CPW a national leader in wildlife management, conservation, and sustainable outdoor recreation for current and future generations.

The United States Forest Service (USFS) and CPW have complimentary responsibilities for maintaining wildlife populations and habitat on the Forest. The USFS helps CPW achieve its wildlife population objectives by providing sufficient terrestrial and aquatic habitat quantity, quality, and function for a wide variety of species that occur on the Forest. Diverse, abundant, and interconnected wildlife populations depend upon the thoughtful management of the habitat, uses, and users that can alter wildlife habitat function. Without a strong partnership in wildlife and habitat conservation, neither CPW nor the USFS can achieve our respective missions and fulfill our wildlife management obligations to the people and visitors of Colorado.

With this in mind, CPW has provided below additional information we recommend addressing in the Plan Assessments for the benefit of wildlife and the Public.

Benefits to People: Multiple Uses, Ecosystem Services, and Socioeconomic Sustainability

In our letter to the GMUG dated June 27, 2017, CPW provided a list of additional data sources to consider for the plan assessments that includes a reference to Southwick Associates (2014) regarding county-by-county specific economic benefits from hunting and fishing activities (Attachment 1). Please include this report in your list of Best Available Science (p.2).

¹ Colorado Parks and Wildlife 2015 Strategic Plan (November 2015)
<http://cpw.state.co.us/Documents/About/StrategicPlan/2015CPWStrategicPlan-11-19-15.pdf>



For the year 2013, the combined economic benefit of hunting and fishing to the ten Counties included within the boundary of the GMUG was over \$114.8 million dollars. Hunting and fishing activities in these counties annually produce over \$18.3 million dollars in federal, state and local taxes, and support 1,908 jobs². In addition, 80 percent of CPW's programs, including conservation programs for non-game species, are funded through hunting, fishing, and recreational shooting. These long-term sustainable economic benefits are dependent on the continued abundance of wildlife and fisheries resources and access to quality hunting and fishing recreation opportunities.

County	Output (\$thousands)	Labor Income (\$thousands)	GDP Contribution (\$thousands)	State/Local Taxes (\$thousands)	Federal Taxes (\$thousands)	Jobs
Delta	\$7,303	\$2,630	\$4,532	\$641	\$558	171
Fremont	\$5,841	\$2,157	\$3,438	\$529	\$333	87
Garfield	\$22,593	\$9,463	\$14,874	\$1,747	\$2,008	322
Gunnison	\$17,041	\$5,960	\$10,170	\$1,413	\$1,281	277
Hinsdale	\$2,177	\$895	\$1,412	\$231	\$166	47
Mesa	\$33,688	\$12,468	\$20,007	\$2,438	\$2,694	484
Montrose	\$12,021	\$4,621	\$7,609	\$931	\$936	218
Ouray	\$2,644	\$918	\$1,665	\$242	\$202	55
Saguache	\$6,905	\$2,700	\$4,457	\$696	\$494	184
San Miguel	\$4,637	\$1,926	\$3,086	\$367	\$385	63
SUM	\$114,850	\$43,738	\$71,250	\$9,235	\$9,057	1,908

Please incorporate this information, as appropriate, into Tables 2, 3, 4, and 5, and in the *Outdoor Recreation and Human Enjoyment of Fish and Wildlife Species* section (p.20-21). The economic contributions of hunting and fishing (numbers depicted in the above table) have been aggregated from across the hunting (big and small game) and fishing spectrum of sportspersons activities. Please incorporate sustainable hunting and fishing activities as an important economic driver for these counties (p.12).

CPW believes that is important to look at the hunting and fishing user numbers in a broader context than just as a percent of total visitors on the forest. For example, when and where hunting and fishing occurs across the forest can provide insight to its application to the Recreation Opportunity Spectrum (ROS) and compatibility with other uses (see CPW comments on Recreation Assessment below). CPW believes that the jobs, revenues produced, and recreation opportunities provided by hunting, fishing, and wildlife viewing are long-term sustainable resources that are not mutually exclusive to other user activities on the forest, but it is incumbent upon CPW and the USFS to identify in the Forest Plan population limiting wildlife habitats and include appropriate standards and guides to coordinate winter and

² Southwick Associates. 2014. The economic contributions of outdoor recreation in Colorado: a regional and county level analysis, Fernandina Beach, FL 32pp.

summer recreation and other user activities in these areas so that competing uses are managed sustainably.

Recreation

Please incorporate more of an emphasis on hunting, fishing, and wildlife viewing opportunities throughout the Recreation Assessment. Colorado has the largest elk population in the world. Consequently, CPW can provide sustainable elk hunting opportunities found few other places in the West. Per the Socioeconomic Assessment (p. 21), the GMUG planning area Game Management Units (GMUs) contain 18% of Colorado's elk population, and in 2016 some 42,514 elk hunters obtained licenses to hunt in the planning area, resulting in an estimated 234,856 recreation days for elk hunting alone.

Most of the GMUs within the GMUG have unlimited "over-the-counter" elk hunting licenses for archery and in the second and third rifle seasons. This unique opportunity allows hunters the ability to hunt every year if they are not successful in the limited license draw, and often provides the only consistent year-to-year elk hunting opportunity for the non-resident elk hunter nationwide. The importance of maintaining this elk population and the unique recreation and economic opportunities it provides both within Colorado and nationally cannot be overstated.

Colorado also has one of the largest mule deer populations in the country. The GMUs within the GMUG planning area contain approximately 21% of Colorado's mule deer population and hunting licenses for mule deer provided another 45,450 recreation days in the planning area in 2016. Colorado's combined mule deer and elk populations provide a legacy for future generations and are a management concern of the highest priority for CPW. The recreational opportunities these wildlife populations provide also provide a broad range of economic opportunities to local service providers and landowners, as well as local and national outdoor retailers.

Recreation, pages 1-2, *Overview of Recreation Programs and Key Attractions*: Please add big game hunting as a key attraction and desirable recreation opportunity for both residents and visitors to the state.

Recreation, pages 2-3, *Key Issues*: Please include maintaining wildlife populations and quality hunting and wildlife viewing opportunities in the face of anticipated human population growth and demand for other expanded uses on the GMUG as a key issue. It is important to note that moving away from a Management Prescription Emphasis and ROS of "Semi-Primitive Non-Motorized Recreation Opportunity" to one with higher road and trail densities and more motorized use will decrease quality hunting and wildlife viewing opportunities in these areas.

Recreation, pages 3-4, *Recreational Opportunities and Use Conflict*, and p. 6-7, *Current Recreation Settings* (ROS): Wildlife habitat fragmentation (impacting habitat function) and wildlife distribution (especially with species like elk) is greatly affected by other recreational uses on the Forest. This makes wildlife a key consideration for planning other recreational uses to avoid recreation conflicts and potential impacts to adjacent private landowners from game damage. For example, expanded winter recreation and development of a winter ROS in crucial big game winter ranges without spatial and temporal management standards designed

specifically to avoid displacing wintering wildlife will negatively impact big game populations and affect future hunting opportunities. CPW can assist with identification of crucial big game winter ranges and the development of a detailed spatial and temporal use analysis to coordinate winter recreation activities and the development of a winter ROS so that both recreational opportunities are maintained. Please add this information to your list of identified conflicts and ideas to address them.

Recreation, pages 5-6, *Use of Best Available Science*: CPW supports the concept of Best Available Science. CPW can provide a reference list of research evaluating the affects of various recreational uses on wildlife and wildlife distribution to assist with recreation planning to avoid conflicting uses and impacts to wildlife, hunters, and nearby landowners.

Recreation, pages 7-8, *Conditions and Trends for Recreation Settings*: There is a need for winter travel management planning on the GMUG. The availability and access to quality winter range habitat is population limiting for many species including elk, mule deer, and bighorn sheep. As described above, impacts to habitat function and wildlife distribution are key factors for consideration during the planning process for winter travel and recreation on the GMUG.

Recreation, page 12, *Developed Recreation Opportunities by Geographic Area, San Juans*: The influence of recreation in all its forms in the interior San Juans/Lake City/Ouray/Alpine Loop (Triangle) is under-represented. BLM estimates that the Alpine Loop Area receives upwards of 600,000 visitors a year. USFS trailheads for the Uncompahgre, Matterhorn, and Wetterhorn are receiving extremely high use and are in need of restrooms. CPW recommends that GMUG staff work closely with BLM for input on the Recreation Assessment and Plan revision as it relates to this area. A significant amount of high alpine and rare ecosystems (fens and riparian) are adjacent to one another on BLM and USFS lands. This part of the GMUG is unique and rare as it encompasses the only high mountain/alpine BLM in the nation.

Recreation, pages 15-16, *Dispersed Recreation Opportunities by Geographic Area*, and Appendix A: High quality hunting opportunities existing in each of the five geographic areas identified as described below - please incorporate this information into Appendix A and the summary provided on pages 15-16. Table 7 indicates that a higher percentage of people identify hunting and fishing as their primary dispersed recreation activity as compared to motorized use, yet only two geographic area summaries mention hunting and fishing, while all but one mention some form of motorized use as the most common activities. This is not consistent with Table 7.

Recreation, pages 15-16, *Dispersed Recreation Opportunities by Geographic Area, Grand Mesa*, and Appendix A, *Grand Mesa Geographic Area*: Grand Mesa is extremely popular for fall big game (mule deer and elk) hunting. Please add a description of this important fall use to recreation opportunities in this geographic area.

Recreation, pages 15-16, *Dispersed Recreation Opportunities by Geographic Area, North Fork*, and Appendix A, *North Fork Geographic Area*: The summary (pages 15-16) accurately describe the Raggeds and West Elk Wilderness Areas as very popular hunting destinations. Please modify the language in Appendix A, p. 59 to positively highlight the popularity of this

seasonal use and potential need to increase hunting opportunity on the GMUG to spread out users to satisfy demand in this area.

Recreation, pages 15-16, *Dispersed Recreation Opportunities by Geographic Area, Gunnison*, and *Appendix A, Gunnison Geographic Area*: Taylor Park is a very popular and important fall hunting area, particularly for archery and the first, second, and third big game rifle seasons. Likewise, in the Crested Butte area, Kebler Pass and Lake Irwin are both very popular hunting areas for archery and the second and third big game rifle seasons. Please add this information to the recreation opportunities identified in the summary (p. 15) and Appendix A for the Gunnison geographic area.

Recreation, pages 15-16, *Dispersed Recreation Opportunities by Geographic Area, San Juans*, and *Appendix A, San Juan Geographic Area*: Please add hunting as a predominant/common use in the fall and an important part of the local economy in this geographic area.

Recreation, pages 15-16, *Dispersed Recreation Opportunities by Geographic Area, Uncompahgre Plateau*, and *Appendix A, Uncompahgre Plateau Geographic Area*: Hunting remains one of the most popular dispersed recreational uses on Uncompahgre Plateau. Maintaining high quality habitat and hunting opportunities in this area is a priority for CPW.

Recreation, page 24, *Recreation Opportunities on Other Federal and State Lands*: CPW staff will provide the GMUG a list of State Wildlife Areas (managed primarily for quality hunting, fishing, and wildlife viewing opportunities) and State Parks within the GMUG area to incorporate into this discussion. It is important that the Plan recognize the management goals on these lands, particularly when they are in close proximity or adjacent to the GMUG.

Recreation, page 27-31, *Recreation Demand and Preferences on the GMUG*: The big game license sales data and hunter use data provided in the Socioeconomic Assessment (p. 21) seems to contradict the information provided in Tables 14 and 17. In addition, it is important to recognize that the geographic area required in order to provide a quality user experience for each recreational activity identified in Table 17 varies greatly. Downhill skiing has the largest percentage participation but requires a small percentage of the overall acreage on the GMUG to provide a quality experience to these users. In contrast, wildlife related recreation (hunting, fishing, wildlife viewing) occurs on nearly all of the GMUG in some capacity and intensity. While hunting, fishing, and wildlife viewing may have fewer participants than downhill skiing, the need for much larger landscapes is essential for safety, to maintain wildlife habitat and populations, and to provide a quality wildlife recreational experience.

Recreation, pages 35-36, *Dispersed Recreation, Recreational Conflicts and Incompatibilities*: Please include a discussion of the potential conflicts between expanded trail-based recreation and wildlife recreation opportunities. These conflicts may take several forms: 1) expanded trail networks and trail use displace wildlife to private or other non-accessible lands so that quality hunting and wildlife viewing opportunities are reduced on the GMUG, and/or 2) expanded trail networks and trail use in crucial limiting wildlife habitats (breeding/wintering/migrating) reduce the functionality of these and adjacent habitats and negatively impact wildlife populations such that quality hunting and wildlife viewing opportunities are reduced on both public and private lands.

Recreation, page 40, *Financial Sustainability of the Recreation Program*: This discussion is enlightening. Please incorporate in Chapter 9 a discussion of the need to address the critical funding constraints for the recreation program. Decommissioning developed campgrounds and restrooms as described on p. 33 is going to exasperate environmental issues in these and surrounding areas given the user trends and predicted increase in demand. In addition, the acknowledgment that existing trails are not being maintained (p. 36) should mandate plan direction that incorporates decommissioning of existing low-use or poor condition trails to offset any new trail construction.

Recreation, page 49, *Forest Plan Management Direction for the GMUG Recreation Program, Dispersed Recreation*: The trail capacity/crowding discussion as it relates to maximum persons at one time/acre ROS capacity thresholds described in Table 24 is confusing and difficult to interpret. It appears that the semi-primitive non-motorized and semi-primitive motorized trail use capacity thresholds are equal in Table 24. In other words, a mile of trail being used by five mountain bikers feels equally crowded as the same trail with five ATVs. This seems counter-intuitive. Please provide additional explanation on how the ROS capacity thresholds were established.

Recreation, page 50, *Forest Plan Consistency with External Recreation Plans*: Please add CPW's 2015 Strategic Plan and the goals and objectives it contains regarding maintaining sustainable wildlife populations to support the broad array of recreation opportunities they provide. In addition, please add CPW's 2016-2026 Statewide Trails Strategic Plan and the strategic goals and objectives it contains regarding emphasizing trails that protect sensitive species and wildlife habitat. Please also add a reference to CPW's DAU plans as they describe CPW's wildlife population objectives that tie directly to recreational hunting opportunities within their boundaries.

Recreation, pages 51-52, *Potential Need for Change of the Forest Plan to Respond to Recreational Issues, Dispersed Recreation*: Please incorporate the following issues into your discussion of potential need for change in the Forest Plan:

- There is a need to consider specific strategies for expanding quality hunting opportunities on the GMUG to alleviate crowding in popular areas during hunting seasons. This issue is tied directly to the proliferation and impact of dispersed camping.
- As GMUG staff consider public concerns about trail opportunities, there is a need to provide clear Plan direction and standards for route (road/trail) densities that are consistent with maintaining the function of population-limiting wildlife habitats and quality hunting opportunities.
- The lack of funding identified for maintaining the existing trail system (p. 36) necessitates some Plan direction on limiting expansion of the total trail miles on the GMUG to that which can be maintained and patrolled with identified funding sources. Consider incorporating Plan direction for decommissioning existing trails that have disproportionate impacts on wildlife to offset any new desired trail construction.

- There is a need to provide clear Plan direction on any expanded winter recreation activities (fat-biking, cross-country skiing, and other over snow travel), so that expanding these activities does not coincide with crucial winter ranges for big game and other limiting wildlife habitats.
- There is a need to provide direction for permitting recreation special uses so that these permitted uses do not conflict with limiting wildlife habitats and important hunting areas/seasons.
- CPW has had a significant increase in complaints on both the upper Gunnison and Taylor rivers in recent years regarding illegal river outfitting. It is expected to continue to increase at the current levels of use on the rivers. We are also hearing from registered hunting outfitters in the Gunnison Basin that many are beginning to feel crowded. Including a discussion on a cap on the number of outfitters and guides on the GMUG may allow the Forest to better administer those recreational resources.

Terrestrial Ecosystems:

Terrestrial Ecosystems, page 2, *Key issues*: CPW agrees that some systems would benefit from additional monitoring to understand the impacts from ecological stressors. CPW encourages additional monitoring of herbivory between domestic and wild ungulates. Allocating more resources to monitoring will allow data-driven discussions and decisions during CPW's herd management planning, USFS grazing permit renewals, etc.

Terrestrial Ecosystems, page 8, *Key Ecosystem Characteristics*: Please incorporate wildlife as a key ecosystem characteristic. Wildlife populations are indicators of ecosystem health and meet the criteria outlined by the GMUG for selection as a key ecosystem characteristic: a) available information, b) can be measured or assessed, and c) respond to direct or indirect management, or will inform management in the plan area. Under key ecosystem characteristics, please identify appropriate wildlife species that are good representatives of the different ecosystems as well as multiple ecosystems to monitor ecosystem health and changes over time. Species incorporated should be species of concern, sensitive species, and big game (deer, elk, bighorn sheep, moose) as they are important to CPW management and the public for hunting and economic input into local communities.

Terrestrial Ecosystems, page 16, *Management Influences, Recreation*: CPW agrees that recreation is an ecosystem stressor. The implementation of travel management, and importantly, an increased focus on enforcement of travel management are important tools to reduce the impacts of recreation that should be discussed in this assessment section. In addition, please consider adding a discussion regarding the benefits of concentrating high intensity uses in specific areas and providing adequate infrastructure (campgrounds, restrooms, etc.) to minimize spreading impacts from dispersed uses across the forest. Closing areas to dispersed camping (p. 17) will likely force the problem elsewhere and result in greater impact to wildlife resources across the Forest.

Terrestrial Ecosystems, page 16, *Management Influences, Recreation*: CPW is concerned about increased volume of use associated with climbing 14ers, and the impacts of this increased use on wildlife distribution, particularly bighorn sheep and elk in alpine

environments. Please elaborate on the alpine impact identified in this section to add a description of this concern.

Terrestrial Ecosystems, pages 51-53, *Key Characteristic Patch Size and Habitat Connectivity*: CPW agrees that patch size and habitat connectivity are very important issues to address in the Plan. Habitat fragmentation and reduced functionality of wildlife habitats are a critical concern for CPW as these issues directly impact CPW's ability to achieve its mission. Adequately addressing patch size and connectivity in the Plan will help address CPW's concerns regarding big game distribution and increasing quality big game hunting opportunities on the GMUG. Focal species for fragmentation analysis and patch habitat desired condition should include mule deer and Rocky Mountain elk.

Terrestrial Ecosystems, pages 60-62, *Potential Need for Changes to Respond to Terrestrial Ecosystem Integrity Issues*: Please incorporate the following issues into your discussion of potential need for change in the Forest Plan:

- In order to anticipate and prevent unwanted ecological impacts from increasing levels of recreation on the GMUG, it is critical to have increased USFS presence on the landscape. Over the past several years there are fewer USFS personnel out on the GMUG (certainly in the Gunnison Basin) than prior years during the fall hunting seasons. With travel management, additional camping restrictions (Tincup/Taylor Park), seasonal closures (campgrounds, some roads/trails) and an increasing population/visitation it is necessary to have staff presence on the ground to post/sign, educate, monitor, ensure compliance and take enforcement action. Currently there is one USFS LEO (Law Enforcement Officer) to cover the entire Gunnison Basin and North Fork. With the amount of use currently and anticipated increases in use, the planning effort and concepts it puts forth will not succeed without people on the ground helping with implementation, education, and enforcement.
- CPW agrees with the general need identified by the GMUG to increase focus on proactively managing to retain resiliency. Please incorporate in this discussion the need to manage habitat and wildlife populations using this same "manage for resiliency" approach. This is particularly relevant to managing for the key characteristics of patch size and habitat connectivity. With the large scale habitat alterations occurring due to spruce beetle, mountain pine beetle and other insects and impacts, we encourage a more proactive management approach including salvage, use of prescribed fire, "let it burn" in appropriate settings, and other tools.
- Consider management direction regarding removal of encroaching pinion-juniper in sagebrush parks. Also evaluating young pinion-juniper forests that have sagebrush understory to open up the overstory to maintain and promote the sagebrush understory.
- Consider management direction requiring no new public roads as a result of timber management - administrative access only during timber management projects.
- Consider management direction specifically designed to improve infrastructure (campgrounds, restrooms, etc.) and capacity in highly popular areas to help

concentrate high intensity recreational uses and avoid accelerating the spread of dispersed recreational uses across the forest. Please consider improving infrastructure and capacity in these existing popular areas as an alternative to closing dispersed camping to reduce impacts. CPW is concerned that closing dispersed camping will simply push the problem to new areas and further spread the impact to wildlife and other forest resources.

Terrestrial Ecosystems, Appendix G, page 115: In the projections for the future section wildlife species should be evaluated to determine how wildlife populations will respond as ecosystem type conversions occur within the three identified climate change scenarios. A variety of species should be used for this analysis including mule deer and elk.

Terrestrial Ecosystems, Table 49, page 127: Please evaluate additional wildlife species that utilize different ecosystems as well as multiple vegetation communities to understand impacts of climate change on wildlife populations and diversity. CPW strongly encourages the GMUG evaluate the impacts of changing plant communities on mule deer, elk, and bighorn sheep since these species use a variety of vegetation types. Managing vegetation types for different climate change scenarios will affect population distribution and abundance for these species. GMUG management scenarios will affect how CPW manages wildlife populations and shift wildlife distribution and hunting opportunities. This will affect CPW, hunters, outfitters, and economic inputs into the local communities within the GMUG.

Terrestrial Ecosystems, Table 49, page 131: In the recreation section please include wildlife-related recreation opportunities (hunting, fishing, and wildlife viewing) as highly vulnerable to climate change and identify the direction and magnitude of potential changes to these recreational opportunities.

Aquatic and Riparian Ecosystems:

Aquatic Ecosystems, page 26, *Potential Need for Plan Changes to Respond to Riparian and Wetland Ecosystem Issues*: CPW agrees that additional monitoring for fish and amphibian populations is desired. CPW has conducted a variety of amphibian monitoring efforts on the GMUG - primarily for boreal toads. CPW will provide this information to GMUG staff under separate cover.

Rangeland Management:

Rangeland Management, page 12, *Environmental Sustainability of Rangeland Management*: Wildlife populations tend to be regulated by drought conditions through poor body condition and lower reproductive success. CPW issued drought licenses to increase antlerless elk harvest and improve range conditions, during the drought in the early 2000's. Currently, on the Uncompahgre Plateau, elk numbers have been reduced to objective and are projected to go below objective due to poor calf recruitment. At this time, the poor recruitment appears to be related to both pregnancy rates and calf survival. Factors affecting female elk reproductive success include age and body condition associated with available quality forage.

Rangeland Management, page 12, *Environmental Sustainability of Rangeland Management*: Please incorporate a reference to the USFS/BLM/CDOA/CWGA/CPW MOU regarding the management of domestic sheep and bighorn sheep.

Rangeland Management, page 13, *Environmental Sustainability of Rangeland Management*: Please include a discussion about how hunting, angling and livestock grazing can coexist with minimal conflict, particularly where livestock may be present into mid-November.

Rangeland Management, page 14, *Economic and Social Sustainability of Rangeland Management*: Please incorporate into the discussion of reduced grazing permittees a discussion of the trend in number of permits and acreage affected.

Rangeland Management, pages 16-17, *Potential Need for Plan Changes to Respond to Rangeland Management Issues*: Please incorporate the following issues into your discussion of potential need for change in the Forest Plan: Consider plan direction regarding removing stray domestic sheep left in an allotment.

Renewable and Nonrenewable Energy Resources, Mineral Resources, and Geologic Hazards Assessment:

Renewable and Nonrenewable Energy Resources, pages 11-14, *Nonrenewable Energy Current and Projected Development Activity*: Please include in this discussion a description of the development activity occurring in the adjacent Bull Mountain and Deadman Gulch Units. While these neighboring Units do not occur on the GMUG, some of the infrastructure being constructed in them (frac ponds, gas and water gathering pipelines, transportation pipelines, electrical utility lines, compressor stations, injection wells, roads, etc.) is being constructed with expanded development on the GMUG in mind. Development on the GMUG will be more cost-effective and likely to accelerate once the infrastructure is completed in these adjacent Units.

Renewable and Nonrenewable Energy Resources, page 36, *Environmental Sustainability of Renewable and Nonrenewable Energy Resources, Mineral Resources and Geologic Hazards*: Relatively high density oil and gas development has been documented to have population-level negative impacts on wildlife, which in turn negatively impacts hunting and wildlife viewing opportunities. In addition, while hunter perceptions of oil and gas development activity are mixed, hunting success decreases in highly roaded landscapes such as those in active oil and gas developments. Please include a description of unavoidable impacts to wildlife populations and loss of hunting and wildlife viewing opportunities as oil and gas development activities increase.

Renewable and Nonrenewable Energy Resources, pages 31-32, *Potential Need for Change*: Consider management direction to address the displacement of big game and loss of hunting and wildlife viewing opportunities on the GMUG as oil and gas development activities expand. Management direction should include avoidance and facility/road density limitations in the most sensitive habitats to minimize impacts, as well as measures to address unavoidably impacted habitats to offset the loss of habitat function (habitat improvement or habitat replacement - compensatory mitigation).

Conclusion

CPW appreciates the opportunity to participate in the Assessment Phase of the GMUG Forest Plan Revision project. We look forward to release of the At-Risk Species Assessment. If you have any questions or would like clarification on any comment in this letter please contact Southwest Energy Liaison, Jon Holst at 970-375-6713.

Sincerely,

Jon Holst for

Patricia D. Dorsey, SW Region Manager

xc: JT Romatzke, NW Region Manager
J Wenum, Area 16 Wildlife Manager
Renzo Delpiccolo, Area 18 Wildlife Manager
Scott Wait, SW Region Senior Terrestrial Biologist
Brad Petch, NW Region Senior Terrestrial Biologist
John Alves, SW Region Senior Aquatic Biologist
Lori Martin, NW Region Senior Aquatic Biologist
Michael Warren, NW Region Energy Liaison



COLORADO

Parks and Wildlife

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ATTACHMENT 1

Grand Mesa Uncompahgre and Gunnison National Forests
Attn: Planning Staff
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Delta, CO 81416
Email: gmugforestplan@fs.fed.us

June 27, 2017

RE: Colorado Parks and Wildlife (CPW) Stakeholder Assessment Comments for the Grand Mesa, Uncompahgre, Gunnison National Forest Plan Revision, 2017.

Dear Forest Planning Staff:

Thank you for the opportunity to participate in the Grand Mesa Uncompahgre Gunnison (GMUG) National Forest Plan Revision Project. CPW appreciates the opportunity to be involved in the process, and we welcome the opportunity to provide input with regard to potential impacts and conservation actions for wildlife and their habitats.

CPW has a statutory responsibility to manage all wildlife species in Colorado. This responsibility is reflected in CPW's mission to protect, preserve, and manage Colorado's wildlife for the people of the State and its visitors. One specific way that CPW carries out this responsibility is to provide comments on major land use planning efforts like this one.

Wildlife resources in the state of Colorado are a long term, sustainable social and economic resource. For the year 2013, the combined economic benefit of hunting and fishing to Mesa, Delta, Gunnison and Montrose Counties was over \$70.1 million dollars. Hunting and fishing activities in these counties annually produce over \$10.8 million dollars in federal, state and local taxes, and support 1,150 jobs (Southwick Associates 2014). These economic benefits are dependent on the continued abundance of wildlife and fisheries resources, access to quality outdoor recreation opportunities, and sound land management.

Implementation of the policies, programs, goals and objectives of the GMUG National Forest Plan may have implications on how wildlife species persist on the forest landscape. The select list of reference documents identified below contains State policies, plans, goals and objectives for wildlife and their management. CPW encourages GMUG staff to review these documents as appropriate and incorporate consistent plan direction, objectives, lease stipulations, standards, and guidelines that promote the preservation, conservation and enhancement of these species and their habitats.

We are happy to provide you with any of the identified documents upon request. Many of them are available on our web page at: <http://cpw.state.co.us/> and we can transmit others electronically. The USFS is a signatory to many of the conservation strategies listed below, and we anticipate that local Forest Service District Offices already have copies of these documents. If there are specific documents that the GMUG staff would like us to transmit, please let us know.

Data Analysis Units Plans (DAU)

Big Game Populations are managed to achieve population and sex ratio objectives established for Data Analysis Units (DAU). A DAU is a geographic area that represents the year-round range of a big game herd and includes all of the seasonal ranges of a specific herd. Each DAU usually is composed of several Game Management Units. The purpose of a DAU is to integrate the plans and intentions of CPW with the concerns and ideas of land management agencies and interested public to determine how a big game herd should be managed.



Below is a list of DAU Plans that cover portions of the GMUG.

- Antelope: A27, A99
- Bear: B5, B12, B17
- Deer: D12, D13, D18, D19, D22, D40, D51
- Desert Bighorn Sheep: DBS60
- Elk: E14, E15, E19, E20, E35, E43
- Lion: L6, L9, L21, L22
- Moose: M4, M5, M12, M13
- Mountain Goat: G11, G8, G1
- Rocky Mountain Bighorn Sheep: RBS13, RBS21, RBS23, RBS25, RBS30

Management/Policy Documents

The following management/policy documents may be useful for the GMUG staff while assessing baseline conditions for the plan revision:

Carlson, Amanda. 2013. Mapping Seasonal Habitat Suitability for the Gunnison Sagegrouse in Southwestern Colorado, USA: Species Distribution Models Using Maximum Entropy Modeling and Autoregression. MS Thesis. The University of Edinburgh.

Colorado Sagebrush: A Conservation Assessment and Strategy. 2005. Colorado Parks and Wildlife.

Colorado West Slope Mule Deer Strategy. 2014. Colorado Parks and Wildlife.

Colorado Parks and Wildlife. 2008. Recommended buffer zones and seasonal restrictions for Colorado raptors. Colorado Parks and Wildlife. Denver, CO.

Colorado River Cutthroat Trout multi-state Assessment 2010 update. 2013. Colorado River Cutthroat Trout Conservation Team.

Conservation Plan and Agreement for the Management and Recovery of the Southern Rocky Mountain Population of Boreal Toad. 2001. The Boreal Toad Recovery Team and Technical Advisory Group.

Conservation Strategy and Agreement for the Colorado River Cutthroat Trout in Colorado, Utah, and Wyoming. 2006.

Grand Mesa Special Management Area. 1997. Bureau of Land Management, Grand Junction Field Office.

Gunnison Sage-Grouse Range-wide Conservation Plan. 2005. Colorado Parks and Wildlife.

Gunnison's and White-Tailed Prairie Dog Conservation Strategy. 2010. Colorado Parks and Wildlife.

Habitat Management Plans (for the Gunnison Basin, North Fork, Uncompaghre and Grand Mesa Habitat Partnership Committees). Plans can be accessed at <http://cpw.state.co.us/aboutus/Pages/HPP-Committees.aspx>

Memorandum of Understanding for Management of Domestic Sheep and Bighorn Sheep. 2014.

Memorandum of Understanding among Bureau of Land Management, Colorado State Office, U.S. Forest Service Rocky Mountain Region, and Colorado Oil and Gas Conservation Commission. Concerning Oil and Gas Permitting on BLM and NFS Lands in Colorado. 2009.

Memorandum of Understanding between the Colorado Department of Natural Resources and the USDA, Forest Service Rocky Mountain Region. Colorado Roadless Rule. 2013. Agreement No. 13-MU-11020000-069.

Range-Wide Conservation Agreement and Strategy for Roundtail Chub *Gila Robusta*, Bluehead Sucker

Catostomus discobolus, and Flannelmouth sucker *Catostomus latipinnis*. 2006. Utah Department of Natural Resources Division of Wildlife Resources.

SCORP (2013). Survey of Outdoor Recreation in Colorado. *Colorado Parks & Wildlife, Statewide Comprehensive Outdoor Recreation Plan*. Unpublished data.

State Wildlife Action Plan: A Strategy for Conserving Wildlife in Colorado. 2015. Colorado Parks and Wildlife.

Habitat Maps

CPW maintains an up-to-date set of data and spatial reference - Species Activity Maps (SAM). SAMs are updated every four years, for 32 game and non-game species. The SAM data is derived from CPW field personnel and updated on a four year rotation with one of the four CPW Regions updated each year. The most recent update for the Southwest Region was 2015 and the latest update for the Northwest Region was 2014. The maps (Arc shape files) can provide invaluable assistance in the development of the forest plan revision; the link will take you to the files: [SAM Maps](#)

Thank you for the opportunity to comment on this very important forest plan revision. We value the opportunity and ability to work together with the GMUG on this project. If you have any questions or would like clarification on any comment in this letter, please contact Southwest Energy Liaison, Jon Holst at (970) 375-6713.

Sincerely,



Patricia D. Dorsey, Southwest Regional Manager

xc: Ron Velarde, Regional Manager, NW Region
Dean Riggs, Deputy Regional Manager, NW Region
Heath Kehim, Deputy Regional Manager, SW Region
Renzo Delpiccolo, Wildlife Manager, Area 18
J Wenum, Wildlife Manager, Area 16
JT Romatzke, Wildlife Manager, Area 7
Jon Holst, Energy Liaison, SW Region
Brian Magee, Land Use Coordinator, SW Region
Michael Warren, Energy Liaison, NW Region
Taylor Elm, Land Use Specialist, NW Region
SWR file



COLORADO

**Colorado Water
Conservation Board**

Department of Natural Resources
1313 Sherman Street, Room 718
Denver, CO 80203

December 6, 2017

Grand Mesa, Uncompahgre, and
Gunnison National Forests
Attn: Plan Revision Team
2250 South Main Street
Delta, CO 81416

Dear Grand Mesa, Uncompahgre, and Gunnison Forest Planning Staff:

The Colorado Water Conservation Board (CWCB) appreciates the opportunity to comment on the draft assessment reports for the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests in this initial stage of the U.S. Forest Service's (FS) forest planning process. Our agencies have a longstanding partnership, as recognized in the 2015 Memorandum of Understanding between the State of Colorado's Department of Natural Resources, the CWCB, and the Rocky Mountain Region of the FS. As stated in the MOU, we are committed to working together to identify steps that can be taken to better integrate federal and state laws and activities concerning protection and management of riparian resources, aquatic habitat and instream flows on National Forest System (NFS) lands. We encourage you to review this MOU and include it as appropriate among other policy documents that provide background for the revised forest plan.

In addition, CWCB believes that Colorado's Water Plan and the Basin Implementation Plans (BIPs) for the Gunnison, Southwest, and Colorado Basins could provide useful policy background for the Forest planning staff. We encourage you to consult these documents for information on how the State and the stakeholders of the GMUG region are working to foster a strong natural environment while meeting the water supply demands of our growing population.

CWCB appreciates the inclusion of multiple references to our agency's Instream Flow (ISF) Program. We strongly encourage the FS to employ the ISF Program as a mechanism to protect flow-related values in lieu of pursuing federal reserved water rights. CWCB has historically maintained that federal reserved water rights are not the best method for protecting flow-related Outstandingly Remarkable Values (ORVs) in river corridors. Likewise, we have consistently expressed concerns regarding potential federal permitting implications associated with determining certain stream segments to be eligible or suitable for Wild and Scenic designation. The draft assessment report regarding Designated Areas indicates that the



GMUG plans to complete the identification and eligibility evaluation for Wild, Scenic and Recreational rivers through a separate public engagement process. CWCB wishes to play an active role in that process, including identifying existing and pending ISF-protected stream reaches. We request additional information be made available about this planning process as soon as is feasible. In particular, we wish to learn the scope of the analysis—whether the FS will pursue only an eligibility study, or if it will also undertake a suitability study. We also encourage the FS to develop a robust process for stakeholder engagement and intergovernmental coordination to avoid unnecessary conflicts.

CWCB's ISF Program provides a means to meet other FS goals, as acknowledged during the 2000-2004 Pathfinder Project. The Pathfinder Project was the joint effort of the FS, CWCB, and multiple stakeholder groups to explore options for protecting instream flow values on the GMUG. The Steering Committee of the Pathfinder Project recommended that the FS rely, primarily, on the state's ISF Program rather than imposing conditions for bypass flows on special use permit renewals. Our staff provided you with a copy of the Pathfinder Project Report on June 23, 2017. We encourage you to continue to take advantage of our ISF Program, as discussed in this report.

The draft assessment report on Watersheds, Water, and Soil Resources acknowledges that the current Forest Plan direction to “obtain rights to instream flow volumes” is not permitted under State law and thus needs to be updated in the next report. This is correct; only the CWCB can hold ISF water rights. While our agency holds this singular role, we work with partners like the FS to identify and secure ISF water rights to protect valuable stream reaches. The GMUG recommended two ISF water rights in 2014: one on Schaefer Creek, which was appropriated by the CWCB in 2015; and one on Kelso Creek, which was postponed as additional data collection is needed. We appreciate that you have provided us this information, and we want to continue to partner with you in this vein.

CWCB asks that future planning documents and drafts acknowledge existing ISF water rights. The CWCB holds ISF water rights on approximately 1,184 miles of stream on the GMUG. We ask that this information be included in the second full paragraph of page 21 of the draft Watersheds, Water, and Soil Resources assessment report. The CWCB holds ISF water rights on approximately 13 of the 19 stream segments that were identified as eligible for Wild and Scenic designation per the 2005 Planning Rule (set forth in Table 12 of the Designated Areas assessment report). For your information, we have attached a tabulation of the ISF water rights on these streams. Because Table 12 does not identify reaches, it is not clear to what extent the ISF reaches coincide with the eligible stream reaches.

CWCB also holds ISF water rights on the Spring Creek hydrologic site discussed on page 40 of the Designated Areas assessment draft. Those water rights are for all of the unappropriated flow from the headwaters of Spring Creek to the spring outlet, and for 0.5 cfs (10/15-4/14), 2.7 cfs (4/15-8/14), and 0.8 cfs (8/15- 10/14) from the spring outlet to the headgate of the Downing Ditch. Identifying existing state protections in FS planning documents will provide a more complete description of the resource's status.

Thank you for the opportunity to comment. If you have any questions, or would like more information about any of the documents or concepts discussed in this letter, please contact CWCB Stream and Lake Protection Section Chief Linda Bassi at linda.bassi@state.co.us or 303-866-3441, ext. 3204.

Thank you,

A handwritten signature in black ink, appearing to read "Lauren Ris". The signature is fluid and cursive, with a large initial "L" and a long, sweeping tail.

Lauren Ris
CWCB Deputy Director

Attachment



Colorado Water Conservation Board Instream Flow Tabulation - GMUG



Water Court Div.	Case Number	Stream	Watershed	County	Upper Terminus (UTM)	Lower Terminus (UTM)	Length (miles)	Amount(dates) (CFS)	Approp Date
4	84CW0428	Bear Creek	San Miguel	San Miguel	headwaters in vicinity of E: 251529.38 N: 4196446.13	confl San Miguel River at E: 253619.56 N: 4202289.70	4.2	2 (1/1 - 12/31)	07/13/1984
4	05CW0147 (increase)	Bear Creek	San Miguel	San Miguel	headwaters in vicinity of E: 251529.38 N: 4196446.13	confl San Miguel River at E: 253619.56 N: 4202289.70	4.2	4.2 (5/15 - 8/14) 2 (8/15 - 5/14)	01/25/2005
4	84CW0364	Cow Creek	East-Taylor	Gunnison	headwaters in vicinity of E: 376268.31 N: 4297472.11	confl Willow Creek at E: 369136.65 N: 4297129.74	5.6	1 (1/1 - 12/31)	05/04/1984
4	98CW0235	Cow Creek	Upper Gunnison	Gunnison	headwaters in the vicinity of E: 302377.90 N: 4278356.71	confl Soap Creek at E: 298215.85 N: 4268999.34	7.5	0.5 (8/15 - 3/31) 1.25 (4/1 - 8/14)	05/11/1998
4	84CW0420	Cow Creek	Uncompahgre	Ouray	confl Wildhorse Creek at E: 274137.68 N: 4215081.58	hdgt div near Forest Service bndry at E: 268772.88 N: 4224687.60	7	18 (4/1 - 7/31) 5 (8/1 - 3/31)	05/04/1984
4	82CW0255	East River	East-Taylor	Gunnison	headwaters at lake at E: 323262.39 N: 4319662.06	confl Copper Creek in E: 327604.32 N: 4313585.01	8	8 (10/1 - 4/30) 15 (5/1 - 9/30)	06/03/1982
4	83CW0226	East River	East-Taylor	Gunnison	confl Copper Creek in E: 327604.32 N: 4313585.01	confl Brush Creek at E: 334462.37 N: 4305251.90	9.4	15 (10/1 - 4/30) 25 (5/1 - 9/30)	06/03/1982
4	83CW0230	East River	East-Taylor	Gunnison	confl Brush Creek at E: 334462.37 N: 4305251.90	confl Alkali Creek at E: 338987.51 N: 4287248.25	13.9	10 (1/1 - 12/31)	06/03/1982
4	83CW0228	East River	East-Taylor	Gunnison	confl Alkali Creek at E: 338987.51 N: 4287248.25	confl Taylor River at E: 339296.06 N: 4281068.42	12.8	27 (10/1 - 4/30) 50 (5/1 - 9/30)	06/03/1982
4	05CW0250	Escalante Creek	Lower Gunnison	Mesa	confl EF & MF Escalante Crks at E: 203296.68 N: 4275899.57	hdgt Knob Hill Ditch at E: 204287.75 N: 4280745.40	3.9	11.5 (4/1 - 6/14) 3.2 (6/15 - 7/31) 1.3 (8/1 - 2/28) 3.2 (3/1 - 3/31)	01/25/2005
4	80CW0093	Oh-be-joyful Creek	East-Taylor	Gunnison	headwaters at outlet Blue Lake at E: 316920.32 N: 4309726.05	confl unnamed tributary at E: 318298.32 N: 4310751.03	1.5	1 (1/1 - 12/31)	03/17/1980
4	80CW0093	Oh-be-joyful Creek	East-Taylor	Gunnison	confl unnamed tributary at E: 318298.32 N: 4310751.03	confl Slate River in E: 324443.27 N: 4308523.98	4.8	3 (1/1 - 12/31)	03/17/1980
4	80CW0092	Slate River	East-Taylor	Gunnison	headwaters in vicinity of E: 318698.99 N: 4318743.23	confl Poverty Gulch at E: 321387.33 N: 4312815.03	4.5	5 (1/1 - 12/31)	03/17/1980
4	80CW0092	Slate River	East-Taylor	Gunnison	confl Poverty Gulch at E: 321387.33 N: 4312815.03	confl Oh-Be-Joyful Creek in E: 324443.27 N: 4308523.98	3.7	8 (12/1 - 3/31) 15 (4/1 - 11/30)	03/17/1980

Colorado Water Conservation Board Instream Flow Tabulation - GMUG

Water Court Div.	Case Number	Stream	Watershed	County	Upper Terminus (UTM)	Lower Terminus (UTM)	Length (miles)	Amount(dates) (CFS)	Approp Date
4	14CW3096 (increase)	Slate River	East-Taylor	Gunnison	confl Poverty Gulch at E: 321387.33 N: 4312815.03	confl Oh-Be-Joyful Creek at E: 323966.16 N: 4308782.62	3.69	30 (5/1 - 7/15)	01/28/2014
4	11CW0144	Tabeguache Creek	San Miguel	Montrose	confl NF Tabegauche Creek at E: 197554.38 N: 4253516.36	confl Forty Seven Creek at E: 192633.18 N: 4252653.69	3.66	3.5 (4/1 - 6/30) 2 (7/1 - 10/31) 1.6 (11/1 - 3/31)	01/25/2011
4	83CW0232	Taylor River	East-Taylor	Gunnison	headwaters in vicinity of E: 344881.69 N: 4314949.33	confl Eyre Creek at E: 349650.62 N: 4317129.96	3.4	3 (1/1 - 12/31)	06/03/1982
4	83CW0205	Taylor River	East-Taylor	Gunnison	confl Eyre Creek at E: 349650.62 N: 4317129.96	confl Italian Creek at E: 358831.67 N: 4312702.92	8.9	12 (1/1 - 12/31)	07/07/1983
4	87CW0261	Taylor River	East-Taylor	Gunnison	confl Italian Creek at E: 358831.67 N: 4312702.92	confl Illinois Creek at E: 364482.23 N: 4303541.23	7.7	18 (11/1 - 4/30) 36 (5/1 - 10/31)	10/02/1987
4	74W2377	Taylor River	East-Taylor	Gunnison	confl Illinois Creek in E: 364482.23 N: 4303541.23	confl Taylor Park Res in E: 364031.37 N: 4302445.47	1	55 (1/1 - 12/31)	09/19/1974
4	87CW0257	Taylor River	East-Taylor	Gunnison	gage below Taylor Park Res at E: 360322.45 N: 4297811.04	confl Spring Creek in E: 345706.96 N: 4287535.69	13.1	50 (10/1 - 4/30) 100 (5/1 - 9/30)	10/02/1987
4	87CW0264	Taylor River	East-Taylor	Gunnison	confl Spring Creek in E: 345706.96 N: 4287535.69	confl East River in E: 339296.06 N: 4281068.42	6.6	80 (10/1 - 4/30) 200 (5/1 - 9/30)	10/02/1987
4	98CW0225	West Elk Creek	Upper Gunnison	Gunnison	confl Buck Wallow at E: 305223.90 N: 4280564.81	confl Blue Mesa Res at E: 301778.77 N: 4264519.28	11.5	10 (4/15 - 7/14) 4 (7/15 - 4/14)	05/11/1998
4	98CW0226	West Soap Creek	Upper Gunnison	Gunnison	headwaters in vicinity of E: 297350.11 N: 4287194.36	confl Soap Creek at E: 298129.96 N: 4279805.67	6.1	2.5 (5/1 - 7/31) 1 (8/1 - 4/30)	05/11/1998

<p>Totals for Water Division 4</p>	<p>Total # Appropriations = 24 Total # Appropriation Stream Miles = 156.6 Total # Increase = 2 Total # Increase Stream Miles = 7.9 Total # Acquisitions = 0 Total # Acquisition Stream Miles = 0 Total # Acquisitions (Cases) = 0</p>
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