



COLORADO

Parks and Wildlife

Department of Natural Resources

Durango Service Center
151 East 16th Street
Durango, CO 81301
P 970.247.0855 | F 970.382.6672

March 27, 2020

Mr. Derek Padilla,
Dolores District Ranger District
29211 Hwy 184
Dolores, CO 81321
(970) 882-6830

RE: Salter Vegetation Management Project

Dear Mr. Padilla,

Colorado Parks and Wildlife appreciates the opportunity to review and provide scoping comments on the proposed Salter Vegetation Management Project within the San Juan National Forest. The project proposes using a variety of mechanical vegetation thinning, timber harvest, and would potentially use fire on the entire project area to achieve a suite of vegetation goals on 35,000 acres. Most of the goals are interrelated and strive to create a healthier, more natural forest, thereby benefitting many forest users, including wildlife. Colorado Parks and Wildlife understands that the project may require the construction of temporary roads as well as use of roads currently listed as Maintenance Level 1 Roads.

The project area encompasses a variety of ecosystem types, including Ponderosa/Gambel oak forest, stands of aspen, and stands of mixed conifer. These different forest types are generally lacking a diversity of tree size and age, which makes them more susceptible to dwarf mistletoe and many different bark beetles. The project area provides habitat for a multitude of wildlife species including elk, mule deer, black bear, mountain lion, coyote, fox, bobcat, Merriam's turkey, dusky grouse, Cooper's hawk, Red-tailed hawk, Sharp-shinned Hawk, Northern goshawk and many other species. The area incorporates valuable fawning and calving grounds for deer and elk, as well as critical winter range for these same species. The area also incorporates nesting habitat for a suite of both migratory and non-migratory birds.

Big Game

The analysis area contains or is adjacent to calving elk. Colorado Parks and Wildlife recommends that timber harvest activities and or burns be coordinated as closely as possible to avoid crucial sensitive periods for wildlife. Avoiding timber management activities from May 15 through June 30 within mapped elk production area would minimize disturbance during this critical production period for big game.

Logging operations in the area will remove overstory and should promote growth of native grass, forbs, and shrubs in the treatment area as well as regeneration of trees. This will encourage use



by big game. Live stands of trees and corridors to stands of trees outside of the treatment area should be maintained. These trees provide important hiding and thermal cover near what will become an attractive foraging area. Please include design features for project implementation that will ensure treatment areas will provide security and thermal cover for big game.

Prescribed burns within the project area should be planned to attempt to provide a mosaic of habitat for wildlife. Smaller, patchy fires that maintain pockets of cover and shelter will provide the greatest benefit to both big and small game.

Travel Management

Road densities can impact the use and occurrence of many wildlife species. Colorado Parks and Wildlife is very supportive of travel management decisions with the long-term goals of preserving blocks of unfragmented wildlife habitat, and holding big game, on public lands where they are available for harvest by public land hunters. Road densities, vegetation management, and recreation management are some of the major activities that may impact effective use of habitat by mule deer, elk, and other species. Maintaining or reducing road density will provide more usable habitat within the treatment area for wildlife.

Colorado Parks and Wildlife recommends that all closed system roads, non-system roads, and new temporary roads that would be opened or constructed for the project be closed and rehabilitated after the project is completed. Access to the closed roads should be gated or, where the topography is appropriate, obliterated to prevent use by motorized vehicles. Please incorporate design features that address how project roads will be managed during the project and after project's completion.

Raptors

There is an established body of evidence that human activities and habitat alteration in close proximity to raptor nest sites may adversely impact nest success (Oxley et al. 1974, Scott 1985, Knight and Skagen 1988, Watson and Langslow 1989, Homes et al. 1993, Schomburg 2003, Fuller 2010). Many raptor species return to the same nest locations annually, making their annual breeding success sensitive to direct and inadvertent human disturbance and habitat alteration at existing nest sites (Megown et al. 2007). Protecting existing raptor nest sites and the reproductive activities at those sites is critical for managing long-term raptor population trends in Colorado. Please include in the environmental assessment a discussion on how active raptor nests will be conserved within the analysis area.

Aquatic Species

The project area encompasses several smaller drainages that do not directly support fish, but that drain into the McPhee Reservoir which is a destination trout fishery as well as small/ largemouth bass and supports other fish species including Kokanee Salmon, Crappie, and Perch. Colorado Parks and Wildlife's primary concern regarding aquatic species is to maintain water quality by limiting erosion and sedimentation into streams. Water quality can be maintained by minimizing drainage crossings and surface disturbing construction activities near these resources. Controlled burns should also be planned with an effort to minimize erosion within the watersheds. Please incorporate design features to protect fisheries and water quality from the proposed project.

Non-native Invasive Weeds

Colorado Parks and Wildlife views one of the biggest threats to ecosystem health on federal lands in this area as non-native invasive weeds. Many invasive weeds can already be found throughout the project area. Invasive weeds generally flourish following disturbance, and active weed management should be incorporated post-treatment for any project. Any equipment used for treatments should be cleaned beforehand so that it does not harbor weed seeds and aid in their spread. Please incorporate design features to prevent and reduce the spread of noxious weeds from the proposed project.

Conclusion

Thank you for the opportunity to comment on this proposed project. If you have any questions concerning these comments, please feel free to contact myself at (970) 749-1435. We look forward to working with you for the benefit of wildlife and would be willing to attend any informational meetings that the Forest Service proposes for this project.

Sincerely,

A handwritten signature in black ink that reads "Matt Sturdevant" with a stylized star or flourish at the end.

Matt Sturdevant
District Wildlife Manager

Cc: Matt Thorpe, Area Wildlife Manager; Cory Chick, SW Regional Manager; J. Holst SW Region Energy Liaison; B. Magee SW Land Use Coordinator; B. Weinmeister Area 15 Terrestrial Biologist; Area 15 File

References

Fuller, M. R. 2010. Raptor nesting near oil and gas development: an overview of key findings and implications for management based on four reports by Hawk Watch International. U.S. Dep. Inter. Bur. Land Manage. Tech. Note 432. Denver, CO. 11pp.

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