COLORADO
Parks and Wildlife
Department of Natural Resources

Southwest Regional Office
415 Turner Drive
Durango, CO 81303
P 970.375.6703 | F 970.375.6705

December 29, 2020

Mr. Kyle Beagley
Manti-La Sal National Forest
Supervisor's Office
599 West Price River Drive
Price, UT 84501
**mlnfplanrevision@fs.fed.us**

RE: Manti-La Sal National Forest Land Management Plan Revision

Dear Mr. Beagley,

Thank you for the opportunity to provide comments on the Manti-La Sal National Forest Draft Revised Land Management Plan (September 2020). Colorado Parks and Wildlife's (CPW) 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 Plan[1] 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 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. These habitats must be able to fulfill the life cycle needs of the species which inhabit these lands throughout the year. Forest use and users can alter wildlife habitat function. We recommend the Draft Plan incorporate Standards and Guidelines to protect the value and functionality of these important areas for wildlife. Specifically, CPW has mapped portions of the Manti-La Sal NF as elk winter concentration areas, severe winter range, elk production areas, mule deer winter concentration areas, and mule deer severe winter range within Colorado. Additionally mule deer and elk seasonally migrate from higher elevations in the La Sal Mountains in Utah to lower elevation winter ranges in Colorado. CPW Species Activity Mapping (SAM) data is available online to identify these critical habitats by species: https://cpw.state.co.us/learn/Pages/Maps.aspx.

As you are aware, recreational use has continued to increase within the Forest. Summer recreational use around Buckeye Reservoir and the surrounding lands is reaching capacity. CPW is concerned that increased recreational road and trail development and use could adversely impact wildlife habitat on the Forest. There

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

is a large body of evidence documenting the effects of roads on habitat quality for a wide range of wildlife species (Foreman et al. 2003, Hebblewhite 2008, Nietvelt 2002, Sawyer et al. 2006 and 2009). Doherty et al. (2008), Hebblewhite (2008), Sawyer et al. (2009), Wilbert et al. (2008), and others have used spatial models to characterize the effects of road/route density on overall habitat quality within a given geographic area. The response to roads and routes for individual species varies. In many cases, responses have been documented as displacement distances or avoidance buffers for individual species. When the average documented displacement distance or avoidance buffer for a given species exceeds the distance to the nearest road across available habitats, the habitat quality for that species has decreased significantly and may result in population level adverse effects (Hebblewhite 2008, Doherty et al. 2008, Ingelfinger and Anderson 2004, Sawyer et al. 2006 and 2009).

According to a recent literature review of ungulate response to road and well development, significant impacts to ungulate populations begin to manifest themselves when road densities reach 0.5 - 1.0 mile of road/sq. mile (Hebblewhite 2008). A similar road density threshold has been implicated for maintaining sustainable populations of sage grouse, large carnivores and bears (Doherty et al. 2008, Van Dyke et al. 1986, and Clevenger et al. 1997).

In August 2019, Colorado Governor Polis signed Executive Order (EO) D2019 011 *Conserving Colorado's Big Game Winter Range and Migration Corridors*. Specifically, this order directs CPW to identify and work stakeholders to preserve and enhance winter range and migratory movements of big game in Colorado. To address CPWs wildlife population concerns we recommend that the Forest incorporate the following Goal, Standard, and Desired Conditions:

> ***Goal:*** *Planning area is capable of meeting state population objectives. These areas provide sustainable forage and habitat in areas with acceptable levels of human disturbance which do not reduce habitat effectiveness. Anthropomorphic activity and improvements across the planning area are be designed to maintain and continue to provide effective habitat components that support critical life functions for wildlife. This includes components of size and quality on the landscape providing connectivity to seasonal habitats (wildlife travel corridors), production areas, critical winter range, severe winter range, and winter concentration areas, along with other habitat components necessary to support herd viability.*
>
> ***Standard****: To maintain habitat function and provide security habitat for wildlife species by minimizing impacts associated with roads and trails, there shall be no net gain in system routes, both motorized and nonmotorized, where the system route density already exceeds 1 linear mile per square mile, within areas mapped by CPW as elk production, elk winter concentration, elk severe winter range, mule deer winter concentration areas, mule deer severe winter range, and migration corridors[2]. Additions of new system routes within these polygons shall not cause the route density in a proposed project's zone of influence[3] to exceed 1 linear mile per square mile. Exception: this does not apply to administrative routes.*
>
> ***Desired Condition:*** *Habitat blocks of sufficient size and quality exist across the landscape to support wildlife populations. Travel routes provide necessary access while maintaining relatively undisturbed high quality habitat blocks greater than 1000m (0.62 mile) from open motorized system routes and 660m (0.41) from open non-motorized system routes sufficient in size to*

---

[2] System route density at the point of interest as calculated using the Line Density Tool in ArcGIS with a 1 mile grid cell size and a 1.5 mile search radius from the center of the grid cell.

[3] Zone of influence for motorized routes is 1000m (0.62 mile); zone of influence for non-motorize routes is 660m (0.41 mile)(Wisdom et al. 2018).

*provide necessary security areas for populations of big game and other species.*[4] *Relatively undisturbed migration and movement corridors exist across the landscape that provide sufficient security and habitat quality to allow for relatively unabated movement of big game and other species.*

Thank you for the opportunity to comment on the Draft Plan. We look forward to continuing to work with the Manti-La Sal National Forest on the plan amendment. If you have any questions regarding our comments, please contact myself or Southwest Region Land Use Coordinator, Brian Magee at 970 375-6707.

Sincerely,

Brian Magee for

Matt Thorpe
Southwest Deputy Regional Manger
Colorado Parks and Wildlife

XC: Cory Chick, SW Region Manager, Brian Magee, SW Land Use Coordinator, Vanessa Mazel Department Of Natural Resources, Rachel Sralla Montrose Area Wildlife Manager, SWRO File, Area 18 File

Literature Cited

Bartman, R. M., G. C. White, and L. H. Carpenter. 1992. Compensatory mortality in a Colorado mule deer population. Wildlife Monographs 121, Supplement to the Journal of Wildlife Management.

Bishop, C. J., G. C. White, D. J. Freddy, B. E. Watkins, and T. R. Stephenson. 2009. Effect of enhanced nutrition on mule deer population rate of change. Wildlife Monographs 172, Supplement to the Journal of Wildlife Management. 28 pp.

Doherty K.E., Naugle D.E., B.L. Walker B.L., and J.M. Graham. 2008. Greater Sage-Grouse Winter Habitat Selection and Energy Development. Journal of Wildlife Management 72(1): 187-195.

Hebblewhite, M. 2008. A literature review of the effects of energy development on ungulates: Implications for central and eastern Montana. Report prepared for Montana Fish, Wildlife and Parks, Miles City, MT. 125 pp.

Nietvelt, C.G. 2002. The effects of roads on wildlife: bibliography. Report prepared for U.S. Forest Service Bridger-Teton National Forest, Jackson, Wyoming. 73 pp.

[4] Big game species require relatively large habitat blocks with adequate canopy cover for security areas (Paton et al. 2017, Ranglack et al. 2016).

Sawyer, H., Kauffman M.J., and R.M. Nielson. 2009. Influence of well pad activity on winter habitat selection patterns of mule deer. Journal of Wildlife Management 73:1052-1061.

Sawyer, H., Nielson, R., Lindzey, F., and L. Mcdonald. 2006. Winter habitat selection of mule deer before and during development of a natural gas field. Journal of Wildlife Management 70(2), 396-403. 2006

Wilbert, M., Thomson, J., and N. Culver. 2008. Analysis of habitat fragmentation from oil and gas development and its impact on wildlife, The Wilderness Society ecology and economic research department, Washington, D.C. 31 pp.