



COLORADO

Parks and Wildlife

Department of Natural Resources

Durango Area 15 Office
151 East 16th Street
Durango, CO 81301
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Columbine Ranger District
Attn: District Ranger James Simino
PO Box 439
Bayfield, CO 81122

September 13, 2021

RE: Southern HD's Landscape Restoration Project EA

Dear Mr. Simino,

The Colorado Parks and Wildlife (CPW) has reviewed the HD's Landscape Restoration Project EA located near Bayfield, CO. The project is planning to implement vegetation treatments on approximately 34,000 acres with prescribed fire, thinning, mowing/mastication of brush and small trees, grazing, and seeding. This project is within the Columbine Ranger District, on US Forest Service lands, which are highly valuable to migrating and wintering deer and elk herds.

CPW commented on the scoping notice back in October of 2020. In the scoping comments CPW provided, the US Forest Service did address some of our issues/concerns that were raised and we would like to address a few other items.

On page 12, of the EA, under heading Wildlife, it states:

1. In mapped Critical Winter Range, Severe Winter Range, and Winter Concentration Areas: from December 1 through April 30, mechanical and prescribed fire burning operations will generally be limited to no more than two active work locations at one time. If treatment occurs during the restriction period, operating hours will be between 0900 and 1500. For prescribed fire operations only, operating hours may be extended to 1700 on up to three days during the period of December 1 to April 30.
2. In mapped General Winter Range: from December 1 through April 30, mechanical operations will generally be limited to no more than four active work locations at one time. If treatment occurs during the restriction period, operating hours will be between 0900 and 1500. Mechanical operations include chain saw work in hand thinning units, mastication, timber sale operations and biomass removal. Prescribed fire burning, pile burning, and hand-line construction are not restricted at any time.
3. At known peregrine falcon eyries, no treatments would occur within a half mile from 15 March through 1 July except as may be modified by the district ranger, in consultation with the district biologist."

In our scoping comments we identified disturbance and increased human activity in the area may negatively affect big game animals survivability during the winter months and other wildlife species that inhabit the area. We recommended not working on the project during the Big Game Winter Closure from December 1- April 30. Since, the EA clearly contemplates



working in the Big Game Winter Closure Area in the winter, we recommend that the concentrating work locations in close proximity to each other. This will help localize the disturbance in one area and the animals can remain relatively “undisturbed” and less stressed in the rest of the area.

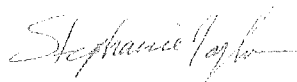
In the EA it is stated under Recreation, on page 42, “In the winter, the area is closed to motorized users because it is part of a big game winter wildlife closure for the area. There is an insignificant amount of use during winter by non-motorized users for short hikes on plowed roads from the oil and gas operations, snowshoeing, and cross-country skiing.” CPW recognizes there is an increase of winter use among these non-motorized users: dog walkers, fat tire bikers, hikers, skiers, snowshoeing, horseback riders and people camping in the parking lots. Even though these are non-motorized users, there is still some level of disturbance to wildlife in these wintering areas.

The project mentions livestock grazing, namely goats. The project areas are already heavily grazed by cattle at various times of the year. In our scoping comments, we highlighted our concerns that the extensive vegetation treatments could reduce the overall forage for deer and elk particularly in the winter months. In our review of the EA we did not see an evaluation and monitoring program on how forage allocations would occur to ensure that habitat conditions are not degraded with domestic grazing. Would the goat grazing on the forest be in addition to cattle grazing? How long of a grazing period would the goats utilize in conjunction with or opposed to cattle? As the Forest Service stated the goats are utilized for their herbivory, they are also a source of weed spreading through droppings and seeds catching in their fur. The Forest Service will still need to have a weed management program and continue weed spraying and monitoring.

Please include more information regarding the process, and monitoring program to ensure that habitat conditions for wildlife are not degraded as a result of the grazing action. CPW recommends resting of the areas after vegetation treatments including burning for a minimum of 3 years to let the grasses and forbs rejuvenate and establish root systems before they are grazed. Southwest Colorado has been experiencing severe to extreme drought conditions. These dry conditions have led to crop and pasture losses, water shortages, and decreased availability of forage for wildlife and domestic animals.

If you have any questions or additional comments to provide regarding this project, please contact District Wildlife Manager Stephanie Taylor at the Durango Service Center at (970) 247-0855. Thank you for the opportunity for CPW to provide comments during the scoping period.

Sincerely,



Stephanie Taylor
District Wildlife Manager, Durango South
Xc: CPW- Thorpe, Magee, Area File