



COLORADO

Parks and Wildlife

Department of Natural Resources

Area 8 - NW Region
0088 Wildlife Way
Glenwood Springs, CO 81601
P 970.947.2969 | F 970.947.2936

U.S. Forest Service
Leanne Veldhuis, District Ranger, c/o Ryan Hughes
Eagle - Holy Cross Ranger District
PO Box 190
Minturn, CO 81645

April 7, 2022

Dear Ms. Veldhuis & Mr. Hughes,

Thank you for the opportunity to provide comments on the Booth Creek Fuels Treatment project. Colorado Parks and Wildlife (CPW) has a statutory responsibility to manage all wildlife species in Colorado. This responsibility is embraced and fulfilled through CPW's mission to perpetuate the wildlife resources of Colorado and to provide sustainable outdoor recreation opportunities that educate and inspire future generations.

CPW has reviewed the Forest Service's (FS) Notice of Proposed Action, dated March 2022. We offer the following comments for your consideration:

CPW supports the White River National Forest's efforts and planning to address fuels in and around the Vail, CO area. CPW has been actively involved in coordination and planning with local FS staff as part of this project. Furthermore, CPW is enthusiastic about the potential wildlife benefits that this project will provide for. As local FS staff is aware, various fuel types across certain portions of the Eagle/Holy Cross district are decadent and resemble a climax seral stage, and contribute to significant fuel loading. These conditions result in decreased forage productivity for wildlife and a subsequent lower carrying capacity for various species. Due to these factors, the Booth Creek Fuels Treatment project has become increasingly necessary from both a fuels management perspective and wildlife habitat improvement perspective.

Due to the complexity of the proposed project area, and presence of sensitive species within the project area, CPW encourages continued collaboration and coordination during the implementation phases of the fuel treatments. Additionally, CPW offers the following recommendations:

- Unit 110 and 112, broadcast burning: CPW recommends only a spring burn window be utilized for these units. This will allow for the longest period of time for new growth and regeneration prior to the next immediate winter, therefore, providing first year benefits for wintering bighorn sheep.
- Further adding to the complexity of a spring burn window is the timing considerations around bighorn sheep lambing. CPW recommends a May 10 cutoff date for unit 112 and the north eastern portions of unit 110 in closest proximity to Booth Creek. This timing is aimed at minimizing aerial and displacing type disturbances prior to bighorn sheep lambing season. Close coordination with CPW is recommended prior to operations in units 110 and 112.



- Units 104, 106 and 108: For these units utilizing mechanical treatments and pile burning, CPW recommends that occasional slash, dead and down, and piles be strategically left to provide cover habitat for small mammals at a ratio of roughly 10:1 burn vs. leave pile. CPW also encourages continued coordination, site visits etc. to identify the most effective way to achieve small mammal habitat goals.
- Timing considerations for Units 104, 106 and 108: CPW recommends timing considerations around treatment to these units, where chainsaw use and other mechanical thinning operations falls outside the elk calving season. Access to the area may also be limited during calving season, therefore not overly restricting viable treatment timelines. Similar to other USFS trail and area closure dates, CPW recommends a June 21 start date for surface disturbance within units 104, 106 and 108. CPW would subsequently recommend, when feasible, a late fall burn window for pile burning in these units.
- CPW recognizes that disturbances will be inherently part of the proposed work, however, CPW also recognizes the significant need for fuels treatment and habitat improvement. Therefore, CPW believes the long term benefits will outweigh the temporary disturbance or displacement of wildlife related to this project.
- CPW also recognizes the high degree of variability and difficulty in alignment of burn windows with a multitude of other factors, therefore CPW is committed to working closely with FS staff and maintaining sufficient flexibility in order for both the FS and CPW to achieve desired project outcomes.

CPW looks forward to continued discussions and work with USFS staff as this project moves forward. Thank you for the opportunity to provide comment. If you have any questions or concerns, please reach out to District Wildlife Manager Devin Duval at (970) 930-5264.

Sincerely,



Matt Yamashita
Area Wildlife Manager

Cc. Devin Duval, District Wildlife Manager

