



COLORADO

Parks and Wildlife

Department of Natural Resources

Northwest Regional Office
711 Independent Ave
Grand Junction, CO 81505
P 970-255-6100 | F 970-255-6111

September 9, 2022

White River National Forest Supervisors Office
900 Grand Avenue
P.O. Box 948
Glenwood Springs, CO 81601-3601

Attention: Scott Fitzwilliams, White River National Forest Supervisor

Regarding: White River National Forest Water & Riparian Resources Forest Plan Amendment

Mr. Fitzwilliams,

Thank you for the opportunity to comment on the White River National Forest Water & Riparian Resources Forest Plan Amendment. Colorado Parks and Wildlife (CPW) has a statutory responsibility to manage all wildlife species in Colorado; this responsibility is fulfilled through CPW's mission to protect, preserve, enhance, and manage the wildlife of Colorado for the use, benefit, and enjoyment of the people of the State and its visitors.

The purpose of this effort is to amend the 2002 White River National Forest Land and Resource Management Plan by adding a forest-wide standard to Chapter 2, Forest-wide Standards and Guidelines, Section One Physical, Water, and Riparian Resources. CPW supports the general intent of the Amendment, which is to provide long-term site protection for all stream, wetland, and riparian areas established, restored, or enhanced through compensatory mitigation actions associated with the Colorado Western Slope In-Lieu Fee Program (ILF) established by the Army Corps of Engineers (USACE). This language will apply to additional USACE-approved compensatory mitigation programs. This effort is a programmatic planning action and is being considered a categorical exclusion from an environmental assessment or environmental impact statement under the National Environmental Policy Act.

The Proposed Action adds Standard 14 to the Plan: "For all stream, wetland, and riparian areas established, restored, or enhanced through compensatory mitigation actions associated with a formal In-Lieu-Fee program or other U.S. Army Corps of Engineers-approved compensatory mitigation program, provide long-term site protection, preclude incompatible uses and, as applicable, comply with long-term and adaptive management requirements outlined in all current Project Development Plans associated with compensatory mitigation sites." Project-level NEPA analysis would identify specific ILF project sites in which this Water and Riparian Resource Standard 14 would apply. After project-level sites are restored or enhanced through the In-Lieu Fee program, ILF sites would be added to the Automated Lands Project (ALP) database or similar database as an "Aquatic Resource Mitigation Area" to track the location and document long-term management goals for each ILF project site.

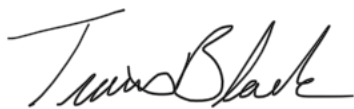


The scoping materials requested that interested parties provide input to identify issues that would be addressed in the forthcoming environmental review. During the environmental review, and when considering the framework that facilitates water and riparian resources mitigation, CPW makes the following requests:

1. Consider the Species of Greatest Conservation Need identified in CPW's [State Wildlife Action Plan](#) (SWAP). The SWAP identifies wildlife species that are in need of conservation attention in Colorado, with a focus on native species. The SWAP groups Species of Greatest Conservation Need into Tier 1 and Tier 2 categories, reflecting a relative degree of conservation priority.
2. Consider species identified in CPW's [High Priority Habitat](#) table. Habitats identified in the HPH table are home to species for which CPW has sound spatial data and research-informed Best Management Practices.

Improving habitat for species found in these two documents should be prioritized for mitigation efforts when the frameworks of the USACE In-Lieu-Fee program, and other USACE-approved compensatory mitigation programs, allow. CPW appreciates the opportunity for our comments to be considered in the White River National Forest's planning process. Please contact Danielle Neumann, Northwest Region Land Use Specialist, at (970) 366-1223 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Black". The signature is fluid and cursive, with the first name "Travis" and last name "Black" clearly distinguishable.

Travis Black
Colorado Parks & Wildlife Northwest Region Manager

CC. Garrett Watson, CPW NW Region Deputy Region Manager
Danielle Neumann, CPW NW Region Land Use Specialist
Ben Felt, CPW NW Region Senior Aquatic Biologist
Taylor Elm, CPW NW Region Energy Liaison