



COLORADO

Parks and Wildlife

Department of Natural Resources

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October 17, 2022

Chad Stuart
Forest Supervisor
GMUG National Forest
2250 South Main Street
Delta, CO
81416

RE: Mt. Emmons Land Exchange Scoping Comments; File Code 5430

Dear Mr. Stuart,

Colorado Parks and Wildlife (CPW) has reviewed the scoping materials provided by the Grand Mesa, Uncompahgre, and Gunnison National Forest (GMUG) for the proposed Mt. Emmons Land Exchange. The proposed exchange involves the GMUG acquiring four parcels of land containing approximately 626 acres while transferring three parcels totaling approximately 550 acres to Mt. Emmons Mining Company (MEMC). All of the federal parcels are adjacent and contiguous with MEMC patented mining claims associated with the historic Keystone Mine.

Non-Federal Parcel Acquisitions

Non-Federal Parcel A (Three Peaks Ranch) lies within the 15,000-acre Whetstone Colorado Roadless Area and, should the agency acquire the parcel, the ranch improvements would be removed to be consistent with management of the surrounding roadless area. The parcel includes the confluence of two upper branches of Carbon Creek and contains over 33 acres of wetlands and habitat for Canada lynx, a federally listed threatened species.

Non-Federal Parcel B (Monchego Creek) contains about 143 acres of designated critical habitat for Gunnison sage-grouse, a federally listed threatened species. There are 2.31 acres of wetlands and 0.48 miles of stream course in this parcel. Ownership of the road segment through this parcel would be acquired. This road segment serves also as the Continental Divide National Scenic Trail and the Colorado Trail; thus, the road segment acquisition would also secure the segments of these two trails.

Non-Federal Parcels C (Sheep Creek) and D (Spanish Creek) together would provide 8.35 acres of wetlands and 2.85 miles of stream course. Ownership of a segment of FST 769 would also be acquired and its acquisition would provide opportunities to extend FST 769 to the south to connect to the Continental Divide National Scenic Trail. Acquisition of both inholdings would



consolidate ownership by the United States and reduce the amount of property lines and survey corners to be maintained.

Federal Parcel Acquisitions

The acquisition of three federal parcels would be transferred into private ownership of the MEMC.

- Parcel 1 encompasses approximately 466 acres and lies east of MEMC's Keystone Mine holdings and southward to include the Kebler Pass Road. This parcel is currently occupied by MEMC's water treatment plant. Tailing storage facility, retention ponds, and other structures.
- Parcel 2 is approximately 81 acres in size and is located west of MEMC's Keystone Mine holdings.
- Parcel 3 is approximately 3 acres in size and lies between MEMC's Keystone Mine holdings and the Daisy Mine patented claims. This parcel is surrounded by private land and currently has no public access.

These three parcels consolidate land ownership for MEMC and remove a public parcel that currently does not have public access.

Wildlife Habitat

Parcels to be acquired by MEMC

- Federal parcels that would be acquired by MEMC lie within CPW mapped mule deer and elk Migration Corridors and are considered High Priority Habitats (HPH) with Colorado. Given the existing developments and operations of the water treatment plants there is likely some avoidance and modified use of the parcels for big game.

Parcels to be acquired by the USFS

- Parcel A lies within CPW mapped mule deer and elk Migration Corridor HPH as well as elk Production Area HPH. These corridors are an extension of the Flat Top ungulate migration corridor to the south. CPW continues to document the significance of this area as a key migration route for elk and mule deer in the Gunnison Basin and surrounding Game Management Units. The area surrounding this private inholding has traditionally been a popular destination for big game hunters willing to hike around the inholding. The reduced human activity, especially outside of hunting seasons, has increased the wildlife value of the area and its status as an elk Production Area. CPW is especially concerned with elk distribution in the Ohio Creek drainage and on agricultural lands along the Highway 135 corridor to the east, based on the burgeoning use by elk on private lands. This increased use by elk on private lands may be a result of pressures on public lands in this area. Due to its proximity to the vast network of trails in the Crested Butte area, and the potential for additional trail connections or expansions in the headwaters of Carbon

Creek, this area could see a large increase in human disturbance bisecting the migration area and prime elk habitat. CPW encourages the USFS to maintain minimally fragmented elk habitat on public land adjacent to private lands in the Carbon Creek, Red Mountain, and Ohio Creek areas by maintaining the current route system with no additional new routes should the Three Peaks Ranch be acquired by the GUMG. Any novel access for the public should be designated as foot or horse. This area was also recently proposed to be a Wildlife Management Area in the Draft Forest Plan for the GMUG (2021). CPW recommends adopting the WMA area, maintaining low route density to preserve this migration corridor, preserving security areas for big game, and maintaining quality hunting and wildlife viewing opportunities.

- Parcel B falls within Gunnison sage-grouse (GUSG) Occupied Habitat HPH. Public acquisition of this parcel will help to ensure that GUSG conservation is a priority.
- A portion of Parcel D falls within CPW mapped elk Winter Concentration Area HPH.

Conclusion

Thank you for the opportunity to provide scoping comments on the proposed Mt. Emmons Land Exchange. Our intent on commenting is to give an evaluation of the wildlife and public access values of each parcel proposed for exchange. It is our conclusion that the proposed exchange is an opportunity to protect and preserve GUSG habitat and important migration, production areas and winter ranges for big game. Public access is improved with the exchange, but future management of access and use of these parcels may necessitate additional management to preserve the value of these areas for wildlife.

If you have any questions or would like to discuss our recommendations, please contact Area Wildlife Manager, Brandon Diamond at (970) 641-7069.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. R. Thorpe", followed by the number "#997".

Matt Thorpe
Deputy Regional Manager, SW Region

cc: Area 16 and 17 File; Southwest Regional File; Southwest Region Manager, Cory Chick; Area Wildlife Manager, Rick Basagoitia; Southwest Energy Liaison, Brian Magee; Southwest Region Land Use Coordinator, Pete Foote.