



# COLORADO

## Parks and Wildlife

Department of Natural Resources

Director's Office  
6060 Broadway  
Denver, CO 80216  
P 303.297.1192

November 1, 2021

Mr. Frank Beum  
Regional Forester  
USDA Forest Service Rocky Mountain Region  
1617 Cole Blvd., Building 17  
Lakewood, CO 80401

**Re: Colorado Parks and Wildlife Species-Specific High Priority Habitat Avoidance, Minimization, and Mitigation Recommendations for Land Use Development Activities**

Dear Frank,

As you know, Colorado Parks and Wildlife (CPW) has statutory authority to perpetuate the wildlife resources of Colorado, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations. This mission is implemented through our 2015 Strategic Plan<sup>1</sup> and the goals it embraces are designed to ensure that CPW is a national leader in wildlife management, conservation, and sustainable outdoor recreation for current and future generations. Part of this implementation includes responding to local, state, and federal agency requests for recommendations to avoid, minimize, and mitigate the impacts of various types of land use development activities on wildlife resources in Colorado.

CPW has adopted several internal guidance documents prepared specifically to guide our staff and promote statewide consistency when making land use development recommendations across jurisdictions, species, and habitat types in Colorado. In early 2020, CPW's internal subject matter experts consulted with peers in other agencies and academic institutions to update these guidance documents to incorporate new information and the best available science. *CPW's Recommendations to Avoid and Minimize Impacts to Wildlife from Land Use Development in Colorado* (Attachment 1) reflect this latest update. These recommendations are now CPW policy to guide staff when commenting on site-specific land development proposals. They will also guide our staff when engaged with the USDA Forest Service (USFS) on NEPA projects, including large scale planning efforts such as Forest Plan revisions (e.g., the Grand Mesa, Uncompahgre and Gunnison National Forest Plan revision) as well as individual projects such as recreation and energy development proposals. Note that these recommendations have also been incorporated into the Colorado Oil and Gas Conservation Commission's revised regulations implementing SB 19-181.

While the recommendations outlined in the Attachment 1 document do not cover all wildlife species in Colorado, they do cover the species and habitats that CPW is concerned about for which we have spatial data and reliable information (peer-reviewed published research) to make defensible management

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<sup>1</sup> Colorado Parks and Wildlife 2015 Strategic Plan (November 2015)  
<https://cpw.state.co.us/Documents/About/StrategicPlan/CPWStrategicPlan.pdf>



recommendations during site-specific land use analyses. Our intent is to update our recommendations every 3-5 years, or as needed when new wildlife science becomes available. Note that Attachment 1 includes only biological recommendations. In addition to these biological recommendations, CPW recommends development avoidance buffers for some special management areas significant to wildlife and wildlife recreation in Colorado, including State Wildlife Areas, State Parks, and Colorado Natural Areas.

In summary, to promote the landscape-scale habitat function necessary to maintain robust wildlife populations across Colorado, CPW strives to make consistent recommendations for all types of development relative to wildlife across jurisdictions. With that in mind, please accept the attached recommendations as CPW policy to guide our input for development activities occurring on all lands in Colorado, regardless of ownership. CPW is currently engaged in multiple USDI Bureau of Land Management (BLM) and USFS land management plan revisions, as well as with the Colorado State Land Board, local agency planning, land use development permitting. We are submitting these same recommendations across jurisdictions to guide planning and permitting efforts statewide. CPW anticipates that the recommendations included with this letter will be integrated, as appropriate, into relevant chapters and appendices within the USFS Forest Plans that are currently being revised, and upcoming federal, state, and local permitting processes. These recommendations can also be found on our webpage here: [https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/CPW\\_HPH-Map-Layers.pdf](https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/CPW_HPH-Map-Layers.pdf)

We appreciate the opportunity to engage with the USFS on the wildlife and land use issues across Colorado. We look forward to continuing our close coordination with you and your staff in the coming months and years. Please let us know if we can provide additional information that you would find helpful as a follow-up to this letter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Prenzl", is written over a large, circular blue scribble.

Dan Prenzl  
Director

Encl: Attachment 1. Colorado Parks and Wildlife Recommendations to Avoid and Minimize Impacts to Wildlife from Land Use Development in Colorado

cc: CPW: Cory Chick, Jacob Brey, Garrett Watson, Brett Ackerman, Mark Leslie, Jeff Ver Steeg, Reid DeWalt, Taylor Elm, Karen Voltura, Brandon Marette, Brian Magee, Danielle Neumann