



September 25, 2025

Ryan Nehl, C/O Grasslands Plan Revision Team  
Pike-San Isabel National Forests & Cimarron and Comanche National Grasslands  
2840 Kachina Drive  
Pueblo, CO 81008

Subject: Colorado Department of Natural Resources comments regarding the Cimarron and Comanche National Grasslands Land Management Plan

Dear Mr. Nehl:

Thank you for the opportunity to provide comments on the draft assessments as part of the Cimarron and Comanche National Grasslands Land Management Plan (CCNG LMP) revision process. The Colorado Department of Natural Resources (CODNR) mission is to develop, preserve, and enhance the state's natural resources for the benefit and enjoyment of current and future generations. Through its eight divisions, CODNR strives to be a steward of the state's natural resources.

The Colorado Water Conservation Board (CWCB), whose mission is to conserve, develop, protect and manage Colorado's water for present and future generations, is a division of CODNR. On behalf of CWCB, we offer the following comments regarding the Wild and Scenic designation recommendation for the Purgatoire River: As consistent with past practices, it is the state of Colorado's preference for the use of state held instream flow water rights to protect wild and scenic values over federal reserve water rights. Please include language in the CCNG LMP that reiterates this position.

Colorado Parks and Wildlife (CPW), another division of CODNR, has also reviewed the draft assessments and will be submitting its comments and recommendations separately, with a focus on finding greater alignment between CPW's recently-updated SWAP list and the proposed list of species of conservation concern.

We appreciate the opportunity to provide comments and recommendations based on the local knowledge of our experts. CODNR respectfully requests that the USFS takes these recommendations from the CODNR divisions into consideration as the CCNG LMP is being

developed. Please reach out to Lacy Gentry, CODNR Federal Affairs Policy Analyst, ([lacy.gentry@state.co.us](mailto:lacy.gentry@state.co.us)) for any questions regarding our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Gibbs".

Dan Gibbs, Executive Director  
Colorado Department of Natural Resources