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Title: Assistant Director for Parks, Wildlife and Lands  
Comments: December 13, 2019

San Juan National Forest Attn: Becca Smith

P.O. Box 310

Pagosa Springs, CO 81147

RE: Public Scoping Comments, Valle Seco 2019 Land Exchange

Dear Ms. Smith,

Thank you for the opportunity to provide input during the scoping process for the Valle Seco 2019 Land Exchange proposed by the U.S. Forest Service's Pagosa Ranger District in the San Juan National Forest (SJNF). The Colorado Department of Natural Resources (DNR) submits the attached comments its division, Colorado Parks and Wildlife (CPW).

DNR and CPW appreciate the state's ongoing partnership with the USFS on a multitude of shared priorities in southwestern Colorado. Among these, our mutual efforts to protect diminishing winter range and migration corridors are top priorities for ensuring the long term viability of big game herds in Colorado. DNR and CPW have a long-standing commitment to work with our federal partners and other stakeholders toward these priorities. This commitment was recently underscored in Executive Order D2019 11, signed by Governor Polis in August of this year, which directs DNR to identify potential regulatory solutions, as well as opportunities for inter-jurisdictional and inter-state cooperation for advancing these objectives.

In support of these objectives, the proposed Land Exchange presents a unique opportunity to transfer a critical inholding in the San Juan Basin - identified as a priority region for big game conservation in CPW's recently-submitted "Colorado Action Plan for Implementation of SO 3362" - to the public domain as part of the National Forest System in the SJNF. CPW has mapped the Valle Seco area as part of both an important migratory corridor and severe winter range for big game. Under USFS management, the Valle Seco parcel would be protected from future private development and managed as habitat to benefit mule deer and elk herds co[shy] managed by Colorado, New Mexico, and the Southern Ute and Jicarilla Apache tribes. This aspect of the proposal would further our efforts to respond to the Governor's EO, as well as the 2018 DOI Secretarial Order 3362, which outlines similar goals.

However, further analysis is required to evaluate trade-offs between the ..gains" for big game conservation represented by the acquisition of the Valle Seco parcel, as compared to potential public benefit compromises inherent in the loss of the lands slated for disposal.

Notably, the proposed exchange includes approximately 176 acres of land within designated Colorado Roadless Areas (175.48 acres in Parcel 1 within the South San Juan Adjacent CRA; .66 acres in Parcel 2 within the Turkey Creek CRA). DNR recognizes that CRAs were established to protect exceptional uroadless" characteristics, such as undisturbed soil, air and water quality; plant and animal diversity; traditional cultural properties (TCPs); sensitive species habitat; natural and highly scenic landscape qualities; and recreational accessibility via primitive and semi-primitive roads.

According to the 2012 Colorado Roadless Rule FEIS (36 CFR 294), there are extensive roadless characteristics associated with the two CRAs that would be impacted by the proposed exchange, including: vegetative diversity; sensitive species habitat (including for Canada lynx); big game habitat and migration corridors; year-round recreation access; and numerous TCPs associated with the Ute Mountain Ute, Southern Ute, and other Indian tribes.

DNR recognizes that the disposal lands proposed by this exchange could produce management and administrative efficiencies as a benefit to the public. However, the change in land ownership would also revoke protective management provisions, and could result in the loss or degradation of scenic, environmental, recreational and cultural qualities on CRA lands.

CRA inventories were developed with public input and review, and were ultimately designated for their exceptional characteristics. For this reason, any proposed reduction in total CRA acreage or adjustments to CRA boundaries should be carefully considered. We encourage USFS to undertake a parcel-level analysis of roadless characteristic impacts on the lands proposed to be removed from the CRA system in a future EA.

Additionally, we encourage the USFS to detail any changes in water rights or planned uses associated with the exchange, and to elucidate the potential development opportunities and uses of the lands that would be transferred to private ownership

With this additional analysis, the state of Colorado and the public will be able to provide more informed input to the decision process regarding the Valle Seco Land Exchange proposal in future reviews.

We look forward to continued engagement in the process.

Sincerely,

Doug Vilsack

Assistant Director for Parks, Wildlife and Lands Office of the Executive Director

Colorado Department of Natural Resources