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RE: Valle Seco 2019 land Exchange Scoping Comments Dear Ms. Smith,

Colorado Parks and Wildlife (CPW) has reviewed the scoping materials provided by the Pagosa Ranger District of the San Juan National Forest (SJNF) for the proposed Valle Seco 2019 Land Exchange. The proposed exchange involves the U.S. Forest Service (USFS) acquiring two parcels containing approximately 900 acres while transferring eleven (11) parcels totaling approximately 472 acres of National Forest System (NSF) land to a non-federal party. All of the federal parcels are adjacent to and contiguous with the non-federal party's existing ownership.

The 880 acre private inholding Valle Seco parcel (Parcel A) is entirely surround by NSF lands within the SJNF. Currently, Forest Road 653 (FS 653) stops at the northern boundary of the Parcel A. Historically, the public was allowed south through the private property and then back onto FS 653 for another 1.7 miles. Today, there is no public access through Parcel A. Consolidation of land ownership could improve both USFS and non-federal management of these parcels. The land exchange proposal involves approximately 175.48 acres of designated Colorado Roadless Area (CRA) lands within the South San Juan Adjacent Roadless Area (Parcel 1) and 0.66 acres in the Turkey Creek Roadless Area (Parcel 2). Additionally, the proposal includes approximately 20 acres within the Middle Fork Piedra River along a segment that has been designated as Suitable Wild and Scenic River Corridor (Parcel 10), and the acquisition of 20 acres within the same corridor (Parcel B), are among the 11 parcels proposed for disposal under this exchange.

Valle Seco Parcel

The Valle Seco parcel presents significant conservation value for wildlife and big game species. CPW has mapped the Valle Seco area as severe winter range and a winter concentration area for both mule deer and elk. This area is one of the most important areas for wintering big game animals within the San Juan Basin. CPW routinely classifies thousands of wintering animals in this area annually as they migrate from high elevation summer ranges in the San Juan Mountains to low elevation winter range in Colorado and New Mexico. Big game winter habitats and migratory corridors are known to be a limiting factor on big game populations in western Colorado and other high mountain areas of the western United States (Sawyer et al. 2009, Bishop et al. 2009). Habitat loss, fragmentation, and development associated with regional human population increases are reducing

habitat availability for wintering wildlife.

Further development of the Valle Seco Parcel would result in habitat fragmentation and considerable habitat loss which would likely have serious negative impacts on mule deer and elk herds under shared management between Colorado, New Mexico, the Southern Ute Indian Tribe (SUIT), and the Jicarilla Apache Tri be. Further, a recent proposal to high fence the entire parcel by the current landowner would impede migrations and movements across the landscape. Both outcomes could result in detrimental impacts ta the San Juan deer and elk herds.

Priority Migration Corridor

CPW recently submitted Colorado's Action Plan for Implementation of Deportment of the Interior Secretarial Order 3362: "Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors" 2019-2020 (Action Plan). In the Action Plan, CPW identifies the San Juan Basin as one of five priority areas wit hin the State to guide efforts to implement Secretarial Order (SO) 3362 and conserve big game migration corridors and winter range

(Attachment A - Colorado Action Plan for Implementation of SO 3362). This area contains the second largest mule deer herd and the third largest elk herd in Colorado. Movements of big game animals have been closely documented for over 15 years (Map 1- Big Game Movements in the Valle Seco Area).

This area has the added benefit of being multi-jurisdictional, with the majority of lands managed by the USFS, BLM, and Southern Ute Tribe, interspersed with private lands, and it contributes to seasonal big game movements crossing into New Mexico. We encourage the Forest Service to meaningfully engage with all of these stakeholders as the environmental analysis of the proposed action is conducted.

In August 2019, Colorado Governor Polis signed Executive Order (EO) D2019 011 Conserving Colorado's Big Game Winter Range and Migration Corridors. Specifically, this order directs CPW to identify and work with Colorado Department of Transportation (COOT) and other stakeholders to preserve and enhance winter range and migratory movements of big game in Colorado. Additionally, COOT has identified this corridor as a focus area for implementing highway-crossing structures to facilitate seasonal wildlife movements (Attachment B - West Slope Wildlife Prioritization Study). The proposed exchange would further collective efforts to advance the objectives in EO D2019 and SO 3362.

Parcels Proposed for Exchange

CPW has evaluated the 11 existing public land parcels proposed for exchange. These parcels vary greatly in their size from 0.02 acres to 175.48 acres. One of these parcels (Parcel 7, El Rancho Pinoso) contains approximately 20 acres of CPW mapped elk production habitat. The 10 other parcels are not mapped as elk production, or severe or winter concentration areas for mule deer or elk. According to our analysis based on preliminary information, the proposed parcel exchanges would not result in land lacking other parcels of NSF lands or constitute impediments to public access to the SJNF.

To fully evaluate the public benefit of each parcel CPW recommends the EA include a parcel-level examination of the trade-offs and benefits such as pub li c access, habitat quantity and quality, functional habitat use by wildlife including big game, aquatic, and sensitive species. The EA should also detail the potential land uses/development opportunities on the parcels slated for exchange and disposal. Finally, the EA should disclose any anticipated impairments to existing water rights, or planned changes in water use that could affect wildlife and aquatic habitat.

Fluid Minerals and Future Management

CPW understands that the fee minerals are severed from the fee surface ownership of the Valle Seco parcel. Fluid mineral development and other types of authorized uses of this parcel are a concern. In order to maintain the functionality of the Valle Seco parcel as high quality habitat for big game, CPW recommends that the USFS obtain the fluid minerals and apply appropriate stipulations to those minerals and to any potential future surf ac e-use authorizations to preserve and enhance the values for which this parcel is being acquired.

Conclusion

Thank you for the opportunity to provide scoping comments on the proposed Valle Seco 2019 Land Exchange. Our intent on commenting is to give an evaluation of the wildlife and public access values of each parcel proposed for exchange, and to identify potential issues for consideration in the environmental analysis. We look forward to continued engagement with the Forest Service on this proposal. If you would like to conduct a site visit, have any questions, or would like to discuss our recommendations, please contact District Wildlife Manager, Doug Purcell at (970) 799-0843.

Sincerely,

Matt Thorpe

Durango Area Wildlife Manager

cc: Southwest Region Manager, Cory Chick, Southwest Senior Terrestrial Biologist, Scott Wait, Southwest Land Use Coordinator, Brian Magee, Area File, Southwest Regional File

References

Bishop, C. J., G. C. White, D. J. Freddy, B. E. Watkins, and T. R. Stephenson. 2009. Effect of enhanced nutrition on mule deer population rate of change. Wildlife Monographs 172, 29p.

Sawyer, Hall, M.T. Kauffman, R.M. Nielson. 2009. Influence of well pad activity on winter habitat selection patterns of mule deer. Journal of Wildlife Management 73 (7);1052-1061.