



COLORADO

Parks and Wildlife

Department of Natural Resources

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United States Forest Service
White River National Forest
Eagle-Holy Cross Ranger District
24747 US Highway 24
Minturn, CO 81654

June 23, 2020

Re: Whitney Creek Geotechnical Investigation

Dear Marcia Gilles,

Colorado Parks and Wildlife (CPW) appreciates the opportunity to review the Whitney Creek Geotechnical Investigation Project Special Use Permit proposal. CPW has a statutory responsibility to manage all wildlife species in Colorado; this responsibility is embraced and fulfilled through CPW's mission to conserve the wildlife resources of Colorado and to provide sustainable outdoor recreation opportunities that educate and inspire future generations.

This project includes two survey components. The geophysical surveys will be conducted at 10 seismic sites per day for one to two weeks, producing 170 decibels of noise disturbance at each seismic location (110 decibels of noise disturbance will be heard on the 0.5-mile radius from the site). The subsurface surveys will consist of 10 borings (or 10 drillings) per site and will take up to five days per location. Cumulatively, this project will take 5-6 weeks to complete. Geophysical survey activities may occur within designated Roadless Areas but subsurface exploration surveys would not occur within designated Roadless Areas.

CPW is listed as a cooperating agency during the NEPA analysis for geotechnical investigations in the Homestake Valley per File Code 2700; 1950 (signed on May 4, 2017, by White River National Forest Holy Cross District Ranger Aaron Mayville). USFS agency regulations [36 CFR 292.25(b)] instruct the USFS to offer cooperating agency status to the State of Colorado for any proposed projects or planning activities within Colorado Roadless Areas. CPW requests to be present at any on-sites regarding the Whitney Creek SUP, especially those to plan the locations of temporary access roads. CPW staff supports the full reclamation of all temporary roads, as soon as possible, to reduce illegal public use in the project areas. CPW recommends that all new roads be completely ripped and reseeded with native seed mixes along the entire roadway length versus reclaiming just the beginning "line of sight" portion.

Wildlife habitats affected by this project include the following:

- Elk production area, defined as that part of the overall range of elk occupied by females...for calving. (Only known areas are mapped and this does not include all production areas for the [Data Analysis Unit]).



- **Elk migration area**, defined as a specific mappable site through which large animals migrate and loss of which would change migration routes.
- **Moose priority habitat**, defined as habitat types associated with the food and cover requirements of moose. Significant loss of these habitats would change moose distribution and/or would adversely affect the population. These habitat types include but are not limited to willow dominated riparian areas, sub-climax coniferous forest mixed with shrublands, and dense climax coniferous forests.
- **Mountain goat summer range**, defined as that part of the home range of a species where 90% of the individuals are located during summer. This range may overlap winter range areas in some instances. Summer range will include what has traditionally been known as spring and fall transitional ranges.
- **Boreal toad general habitat**.

The work areas are also near (but not within) CPW-mapped bighorn sheep production and mountain goat production habitat. CPW appreciates the stated avoidance of geophysical and seismic activities during elk production, from May 15th to June 30th, which should also provide adequate protection for bighorn sheep and mountain goats who may utilize habitats outside of current CPW maps.

CPW requests that all work in the Whitney Creek Area be finished by September 2nd to avoid interference with archery hunting and elk migration corridors. This creates a 9-week activity window in the summer, which should accommodate the proposed timeline of 5-6 weeks for the project to be completed.

CPW recommends that any pits or containers (even if small) with open water or mud be exclusionary fenced for wildlife and appropriately netted to avoid avian access and/or deaths. Smaller mammals (such as short-tailed weasels and snowshoe hares) are located within the project area and should be taken into consideration. Any water suction hoses should be screened to exclude fish. All equipment brought into the drainage should be examined for aquatic nuisance species. CPW recommends disinfecting heavy equipment, hand tools, boots, and any other equipment that was previously used in a river, stream, lake, pond, or wetland prior to moving the equipment to another water body. The recommended aquatic and wetland disinfectant protocols are attached as an appendix.


Controlling undesirable vegetation, noxious weeds, and the spread of disease organisms (chytrid fungus, etc.) can be a challenge. The development of temporary access roads and the transport of heavy equipment create conditions favorable for the introduction and spread of weeds and disease organisms. Boreal toads are particularly susceptible to chytrid fungus and other disease organisms may affect aquatic and riparian health. All equipment and vehicles should be carefully cleaned of debris, power-washed, and sterilized. The potential negative weed and disease organism impacts can be reduced by limiting the number of vehicles to prevent weed seed spread, utilizing certified weed-free seed and straw, and conducting pre-disturbance weed surveys along all access routes. Reducing the impacts of weeds requires a vigilant, long-term effort. CPW suggests monitoring weed management activities and reclamation success annually, for four years, following the geotechnical surveys and subsurface survey work.

We also understand the investigations are needed to evaluate the feasibility of constructing a new dam and reservoir within the Homestake Valley. As emphasized in the Colorado Water Plan, our state is striving to meet the water supply demands of our growing population while fostering a strong, resilient, and natural environment. Meeting Colorado's water supply needs

will require a mix of strategies, including new water supply development. However, environmental impacts resulting from new water supply projects should be minimized and mitigated. CPW welcomes the opportunity to collaborate with the USFS and potential permit applicants on this project and, if this project continues, work with the permit applicants to develop a State Fish and Wildlife Mitigation Plan per Section 37-60-122.2 of the Colorado Revised Statutes.

CPW appreciates the opportunity to provide comments on this project. For additional information or to request clarification on CPW's comments for this project, please contact Land Use Specialist Danielle Neumann at (970) 366-1223 or District Wildlife Manager Devin Duval at (970) 930-5264.

Sincerely,

A handwritten signature in black ink, appearing to read "JT Romatzke". The signature is fluid and cursive, with a long horizontal stroke at the end.

JT Romatzke
NW Region Manager
Colorado Parks & Wildlife

CC. Lori Martin, Senior Aquatic Biologist
Matt Yamashita, Area Wildlife Manager
Karllyn Armstrong, Senior Water Resource Engineer & Water Project Mitigation Coordinator
Danielle Neumann, Land Use Specialist
Devin Duval, District Wildlife Manager