Data Submitted (UTC 11): 8/12/2019 6:00:00 AM
First name: Amy
Last name: Moyer
Organization: Colorado Department of Natural Resources (CWCB and CPW)
Title:
Comments: CDNR Comments on GMUG Working Draft Forest Plan

Sam and Brittany,

Please find attached comments from the Colorado Department of Natural Resources - including Colorado Parks and Wildlife and the Colorado Water Conservation Board - on the GMUG Working Draft Forest Plan.

I've cc'ed division staff. As always, we're happy to continue working with you and to find a time to discuss these comments in more detail.

Thank you!

Amy

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Amy Moyer

Assistant Director for Water

Executive Directors Office

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1313 Sherman Street, Room 718, Denver, CO 80203

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RE: Grand Mesa, Uncompahgre, and Gunnison National Forests Plan Revision - Working Draft Revised Land Management Plan

Dear GMUG Planning Team:

Thank you for the opportunity to submit comments for the Grand Mesa, Uncompahgre, and Gunnison National Forests Working Draft Revised Land Management Plan. We appreciate your willingness to collaborate, coordinate, and address many comments from our staff during this revision process. The Colorado Department of Natural Resources (CDNR) submits the following comment letters prepared by two of our divisions: Colorado Parks and Wildlife (CPW) and the Colorado Water Conservation Board (CWCB).

CDNR most recently submitted cooperating agency comments on the Preliminary Draft Revised Land Management Plan on May 22, 2019 in addition to Wild and Scenic River Eligibility Evaluation comments submitted on March 22, 2019, Wildnerness Evaluation Report comments submitted on September 24, 2018, scoping comments submitted on June 1, 2018, and comments on numerous assessment reports. The comments included herein both add-to and reiterate our comments expressed in these previous letters. We greatly appreciate the continued communication and look forward to building our relationships as this planning process continues.

If you have any questions, please contact Amy Moyer at 303-866-3311, or division contacts. Sincerely,

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Dan Gibbs

Executive Director

P 303.866.3311 F 303.866.4474 www.colorado.gov/dnr Jared Polis, Governor I Dan Gibbs, Executive Director

August 9, 2019

Grand Mesa, Uncompahgre, and Gunnison National Forests

Attn: Plan Revision Team 2250 South Main Street Delta, CO 81416

Dear Grand Mesa, Uncompahgre, and Gunnison Forests Planning Staff:

Thank you for the opportunity to provide comments on the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests Working Draft of the Revised Land Management Plan. We appreciate the collaboration and coordination between our agencies. As established by the 2015 Memorandum of Understanding between the Forest Service (FS), Colorado Department of Natural Resources, and Colorado Water Conservation Board, we are committed to cooperatively work together to manage water and water uses on National Forest lands in Colorado.

The Colorado Water Conservation Board (CWCB) provided written comments on the draft Forest Plan on May 22, 2019. In addition, CWCB provided assessment comments on December 6, 2017, written scoping comments on June 1, 2018, Wilderness Evaluation Report comments on September 24, 2019, and Wild and Scenic River Eligibility Evaluation comments on March 22, 2019. We appreciate the FS[rsquo]s attention to these letters and encourage the FS to continue to work towards the management strategies in our letters to better integrate federal and state laws and activities concerning protection and management of instream flows on National Forest System lands.

In our previous comments, CWCB has encouraged the FS to utilize and incorporate three management tools in the final Forest Plan and associated planning documents: (1) the Pathfinder Project, (2) CWCB[rsquo]s Instream Flow Program, and (3) Colorado[rsquo]s Water Plan.

Pathfinder Project

In our May 22, 2019 letter, we encouraged the FS to include a stronger commitment to the Pathfinder Project management action in the final Forest Plan that references the strategic tools and actions that can provide for instream flows or protect existing flow regimes. In a May 9, 2004 letter addressed to the CWCB, the Forest Supervisor praised the work of the 2004 Pathfinder Project Steering Committee and committed GMUG National Forest staff and Ranger Districts to the concepts of cooperation and coordination outlined in the 2004 Pathfinder Report (Attachment 1). The letter stated that the Pathfinder Project process and strategies for instream flow management would be incorporated into the Forest Plan revision.

P 303.866.3441 F 303.866.4474 www.cwcb.state.co.us Jared Polis, Governor | Dan Gibbs, DNR Executive Director | Rebecca Mitchell, CWCB Director

We appreciate the inclusion of the Pathfinder cooperation strategy as a management approach in the draft Forest Plan, which states, [ldquo][w]hen considering authorizations for water developments and uses, apply the Pathfinder approach (or other similar protocol) to coordinate with stakeholders and provide for balanced

management of environmental flows[rdquo] (Appendix 3. Management Approaches and Possible Actions, Watersheds and Water Resources, page 147). However, the draft Forest Plan also states, [ldquo][t]he listed proposed and probable management practices are not intended to be all-inclusive, nor are they intended to be decisions or commitments, but simply projections of what actions may take place in the future[rdquo] [emphasis added] (Appendix 3. Management Approaches and Possible Actions, page 138).

The CWCB encourages the FS to include and implement the Pathfinder management strategies and results, rather than only reference the Pathfinder approach to coordinate with stakeholders. The tools identified by the Pathfinder Project include 27 possible actions or strategies to achieve instream flow protection without unilateral action and bypass flow requirements on special-use permits. The Pathfinder Project specifically addresses the following:

[bull] The CWCB[rsquo]s Instream Flow Program may provide adequate protection on National Forest Service lands;

[bull] Issues concerning the conditioning of special-use permits by the Forest Service with [ldquo]bypass[rdquo] flow requirements to provide for instream flows; and

[bull] Adherence to State water law and recognition of privately held water rights and the

State[rsquo]s ability to adjudicate water for instream flow purposes.

CWCB[rsquo]s Instream Flow Program

As identified in our December 6, 2017 letter, and other previous letters, CWCB holds Instream Flow (ISF) water rights on approximately 1,184 miles of stream on GMUG. Only the CWCB can hold ISF water rights in Colorado. While our agency holds this singular role, we work with partners like the FS to identify and secure ISF water rights to protect valuable stream reaches. We encourage the FS acknowledge existing ISF water rights in the draft Forest Plan and associated planning documents.

In our May 22, 2019 letter, we recommended the Forest Plan reference the ISF Program and recognize it as a management strategy to protect flow-related values in lieu of pursuing federal reserved water rights, as set forth in the Pathfinder Project. The draft Forest Plan includes the acquisition of water rights for new Federal uses as a management approach (Appendix 3. Management Approaches and Possible Actions, Watersheds and Water Resources, page 147). Prior to exploring an acquisition of water rights to protect flow-related values, the ISF Program can be used as a management strategy to protect instream flows.

Colorado[rsquo]s Water Plan

In our December 6, 2017, September 24, 2018, and March 22, 2019 letters we have consistently expressed concerns regarding potential federal permitting implications associated with the proposed management actions. We have encouraged the FS review and reference Colorado[rsquo]s Water Plan and the Basin Implementation Plans. These documents contain information on how the State and stakeholders are working to foster a strong natural

environment, while meeting the water supply demand of our growing population. These documents provide detailed descriptions of water priorities and descriptions of projects that local water leaders have identified for meeting the area's water needs. We encourage you to work closely with the Basin Roundtables and associated project sponsors.

Thank you for the opportunity to comment. We request and invite the FS for an in[middot]person joint review of our comments to ensure the successful outcome for the citizens of Colorado and the Management Plan. If you have any questions, please contact CWCB Stream and Lake Protection Section Chief Linda Bassi at 303[middot]866-3441, ext. 3204.

Thank you,

Lauren Ris

CWCB Deputy Director

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United States Department of Agriculture

Forest Service

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Grand Mesa, 2250 Highway 50

Uncompahg--WderConsetvauon BoardDelta, CO 81416 Gunnison Voice: 970-874-6600

National Forests TDD: 970-874-6660

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File Code: 3000-3

Date: April 30, 2004

Dan Merriman

Colorado Water Conservation Board 1313 Sherman St. Room 721

Denver, CO 80203

Dear Dan,

I have received the Pathfinder Project Steering Committee Report. Completion of this report addressing strategies for Instream Flow management on National Forest System lands is an excellent template for the Grand Mesa, Uncompahgre, Gunnison '(GMUG) National Forests to consider as part of its Forest Plan revision.

,,....,.

I wish to personally thank you for the time and effort you have put into this collaborative process. I recognize a great deal of understanding, cooperation, and compromise was required by the Steering Committee to develop

this report.

As a Committee member, in a group possessing and representing divergent opinions and beliefs, you are to be commended for your ability to work towards this common goal. The product of this work represents a fresh look at how the Forest Service can work cooperatively with a wide array of the stakeholders having diverse interests in how water resources are managed on the GMUG National Forests.

As the Forest Supervisor, I am committing the GMUG National Forest staff and Ranger Districts to the concepts of cooperation and coordination outlined in your Report. It is our intent to incorporate the Pathfinder Project process and strategies for instream flow management into our Forest Plan revision. The results of your efforts will provide proposals for the Plan revision that I believe will be the foundation to future Forest Service decisions regarding instream flow protection. The Forest Plan revision process will ensure continued public and stakeholder input on water resource management issues. [middot]

It is my firm belief that your Report, which embodies the collective wisdom of the Steering Committee, represents a fair balance of public perspectives on how water resources on our National Forest System lands should be managed in the future. It is my hope this effort will have more far-reaching influence and will serve as a template for other National Forests.

your participation, effort, dedic'ation, and contributions to the Pathfinder Project havebeen greatly appreciated.

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ROBERT L. STORCH

Forest Supervisor

cc: Lisa Carlson, Maro Zagoras

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COLORADO

Parks and Wildlife

Department of Natural Re so urces

Southwest Region

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August 12, 2019

Grand Mesa, Uncompahgre and Gunnison National Forests Samantha Staley

Forest Planner

2250 South Main Street Delta, CO 81416 gmugforestplan@fs.fed.us

RE: CPW Comments Grand Mesa, Uncompahgre, and Gunnison National Forests Working Draft of the Revised Land Management Plan (June 2019)

Dear Sam:

Thank you for the opportunity to provide cooperating agency comments on the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) Working Draft of the Revised Land Management Plan (April 2019). Colorado Parks and Wildlife's (CPW) mission is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. This mission is implemented through our 2015 Strategic Pl an1 and the goals it embraces which are designed to make CPW a national leader in wildlife management, conservation, and sustainable outdoor recreation for current and future generations.

CPW provided written comments on the subject matter assessments prepared as part of this planning effort on December 8, 2017, January 26, 2018, and March 9, 2018. In addition, CPW provided written scoping comments on June 1, 2018, comments on the Wilderness Evaluation Report on October 1, 2018, comments on the Wild and Scenic River Eligibility Evaluation on March 22, 2019, and comments on the Preliminary Draft Revised Land Management Plan (PDRLMP) on May 22, 2019.

CPW recognizes the efforts by GMUG staff to address our previous comments. We greatly appreciate GMUG planning staff's incorporation of Wildlife Management Areas with route density standards into the Working Draft of the Revised Land Management Plan (WDRL.MP). These Wildlife Management Areas will benefit wildlife and wildlife-related recreation and help CPW achieve its mission.

Please consider the following additional comments on the WDRL.MP. CPW recognizes that GMUG staff did not have adequate time to address our May 22, 2019 comments on the PDRLMP prior to release of the WDRL.MP. We have made efforts to avoid duplication with our previous PDRLMP comments, which are incorporated here by reference (see Attachment 1):

1 Colorado Parks and Wildlife 2015 Strategic Plan (November 2015)

http:/
/cpw.state.co.us/Documents/About/StrategicPlan/2015CPWStrategicPlan[middot]11[middot]19[middot]15.pdf

Dan Premt!7>Y, Direct(J". Cobado Parks and Wildlife[bull] Parks and Wildlife Commission: Michelle Zimmerman, Chair[bull] Marvin McDaniel, Vice-Chair James Vigil, Secretary[bull] Taishya Adams[bull] Betsy Blecha[bull] Robert W. Bray[bull] Charles Garcia[bull] Marie Haskett[bull] Carrie Besnette Hauser[bull] Luke B. Sc.haler[bull] Eden Vardy

Chapter 2. Forestwide Direction, Native Species Diversity (SPEC), General Species Diversity, Species (General) (p. 25):

[bull] Objective FW-OBJ-SPEC-03 - Please consider adding the text highlighted in red to this Objective: During each 10-year period following plan approval, restore or enhance at least 25,000 to 80,000 acres of habitat. Of acres treated, 30 percent should be conducted in Wildlife Management Areas (MA 3.2), while other priority treatment areas should include (but are not limited to): aspen, riparian areas, ecotones, winter range in pinyon-juniper communities, connectivity areas, and designated critical habitat. Actions to help accomplish this objective may include: improving wildlife or habitat

connectivity by removing unneeded structures, eliminating redundant routes, mode of

travel conversion of specific routes, or realigning routes into less impactful settings, implementing vegetation management practices that maintain or enhance connectivity, retrofitting or designing new structures (e.g., building new or converting existing fences to wildlife-friendly fence specifications such as a lay-down fence), improving aquatic and riparian resources (e.g., remove barriers, restore dewatered stream segments, connect fragmented habitat, provide organism passage, etc.), etc. See also Wildlife Management Area MA-DC-WLDF-01.

Chapter 2. Forestwide Direction, Native Species Diversity (SPEC), General Species Diversity, Big Game Species (p. 27):

[bull] Please incorporate an additional Guideline to work collaboratively with CPW to achieve mutual objectives for wildlife, fish and recreation resources across the GMUG per MOU 14-MU-11020000-046.

[bull] Please add an additional Objective : Work collaboratively with CPW to annually review the most up-to-date Herd Management Plans, and to adjust management actions accordingly to provide suitable habitat on GMUG lands to meet current Herd Management Plan population objectives and provide sustainable harvest that meets or exceeds average ha rve st success rates from across the state.

[bull] Please add an additional Objective: Evaluate 25 percent of the GMUG planning area every 3 years for opport unitie s to close or re-route system roads, and designated and undesignated routes (motorized and non-motorized trails) to decrease habitat fragmentation and increase security areas for wildlife.

[bull] Please incorporate a Gu ide line mirrori ng guideline FW-GDL-SPEC 26 (p.29) to provide protections from summer recreationa l disturbance for big game species using alpine habitats. Disturbance in

alpine habitats poses similar population- leve l risks to big game species that rely on alpine habitats for rearing young and summer foraging.

[bull] Please incorporate into FW-DC-SPEC-14 (p. 27) "Suitable habitat will be maint ained across the GMUG for big game by provid ing protect ion from disturbance (security areas) and suitable forage to maintain populations and distribution on forest lands, minimizing the potential for animals to be pushed to adjacent private lands. Forest

lands will be managed in collaboration with adjacent land management agencies and private landowners to maintain historical big game migratory patterns and movements across the landscape sufficient to maintain healthy big game populations."

[bull] Please incorporate an additional Guideline: To maintain long-term population viability and distribution objectives, travel route re-alignment options will be considered in association with any new project proposal in order to create larger contiguous habitat blocks and security areas, ultimately reducing the amount of fragmentation. This guideline applies to big game production areas, migration corridors, severe and critical winter range, and winter concentration areas as mapped by CPW. Route re-alignment to create larger contiguous habitat blocks and security areas may increase the route density in some areas on edges of these mapped habitats provided that habitat connectivity is maintained and the overall density of routes in the interior of these habitats is reduced.

[bull] FW-STND-SPEC-16 (p.27): CPW understands the concerns of pack goat enthusiasts. CPW supports a Standard addressing pack goats and bighorn sheep that provides clear guidance for the use of recreational pack goats. If the planning team modifies this Standard, CPW recommends additional collaboration and consideration of a Forest Order addressing Best Management Practices and restrictions for pack goat users that recreate in occupied bighorn sheep habitat.

Chapter 2. Forestwide Direction, Transportation (TSTN) p. 42

[bull] Please add an additional Objective: Evaluate 25 percent of the GMUG planning area every 3 years for opportunities to close or re-route system roads to decrease habitat fragmentation and increase security areas for wildlife while continuing to provide efficient and safe public access.

Chapter 2. Forestwide Direction, Range (RNG) p. 44:

[bull] Please incorporate an additional Guideline to follow the management recommendations to land management agencies from Recommendations for Domestic Sheep and Goat Management in Wildlife Sheep Habitat (WAFWA 2012).

¦ Please incorporate an additional Standard or Guideline requiring temporarily resting pastures receiving habitat treatments for a minimum of 3 years to allow vegetation to recover sufficient to support livestock and wildlife utilization.

¦ FW-GDL-RNG-09 (p. 45): Please change second sentence to read "Exceptions may be allowed to meet objectives related to ... or site-specific objectives, but should not occur in more than 3 years in a 10 year period."

[bull] FW-GDL-RNG-12 (p. 46): Please add that any woven wire fencing should be removed and replaced

with wildlife friendly fencing in allotments not currently used for

domestic sheep grazing and in allotments that are within high risk areas for bighorn and domestic sheep interaction that won't be converted to domestic sheep grazing.

Chapter 2. Forestwide Direction, Recre ation (REC) p. 46:

[bull] FW-GDL-REC-10: Please add to Exceptions: uwhere the desired recreation opportunity setting conflicts with specific Plan Components outlined in Chapter 2 Maintain Ecological Sustainability, or specific Mana gement Area Direction outlined in Cha pte r 3."

[bull] Please add an additional Objective: Evaluate 25 percent of the GMUG planning area every 3 years for opportunities to close or re- route system routes (motorized and non[shy] motorized trails) to decrease habitat fragmentation and increase security areas fo r wildlife while continuing to provide diverse recreation opportunit ies and access.

Chapter 3 - Management Area Dire ct ion, Wildlife Management Area - MA 3.2 (WLDF) p. 61

[bull] Please add an additional Guideline: Management of WMAs identified as having important wildlife migration corridors should incorporate specific manage me nt act f o ns that maintain connectivity and provide consistent management with adjacent landowners for neighboring seasonal wildlife habitats (i.e., seasonal closures for elk summer or winter ra nge , etc.).

Additional Comments Regarding Wildlife Mana geme nt Areas (WMAs) in the WDRLMP:

CPW strongly supports the concept and implementation of WMA's across the GMUG planning area. These focused management areas will help conserve the diversity of wildlife across the GMUG, and sustain the robust economic benefits that wildlife-related recreation provides counties and local communities . CPW offe rs the following comments on WMA's for the working draft:

Almont Triangle Corridor WMA - The Almont Triangle and surrounding areas to the North (to Crested Butte South), East (to Spring Creek and Beaver Creek), and Sout h (to Lost Canyon Gulch), not only provide deer, elk, and bighorn sheep habitat throughout the year, they provide one of the most critical wildlife migration corridors in the Gunnison Basin. This corridor serves as part of a much larger 70-mile connection between the upper Taylor River and East/Slate Rivers to the San Luis Valley. It allows ungulates to escape deep snow-depths to t he north and reach critical winter ranges to the south. Adjacent developments and highway traffic are constricting the movements of ungulates, creating pinch-points on public lands. Future incre ases in recreational and other off-highway traffic in the Lost Canyon, Almont Triangle, Cement/East Ce me nt Mtn, Drs Park/Gandy Gulch, Lost Round Mountain, Granite Basin, Cement Creek, Crested Butte South, and Point Lookout, threaten the long term viability of large populations of elk, deer, bighorn sheep, and the federally-listed Gunnison sage-grouse. Portions of this area around Boston Peak provide a connection corridor between this WMA to the Forest Hill Montane WMA. Much of the area north of Almont already has Colorado Roadless designation

in place, which is consistent with managing disturbance at low levels with respect to wildlife needs.

Forest Hill Montane WMA - The Forest Hill Montane WMA circumscribes some of the best deer and elk summer habitats on the GMUG, a growing moose population, and suitable lynx habitat. Except for Star Trail (FS 411) which bisects this relatively intact parcel, this area is relatively free of human influence and recreation pressure. CPW recommends that the USFS evaluate the value this area provides for wildlife and the need for motorized vs. non-motorized access to this area. Converting the mode of travel of the Star Trail to mechanized singletrack, foot, and horseback only would create one of the largest contiguous blocks of non-motorized wildlife habitat in northeast Gunnison County, and significantly increase the value of this area to wildlife. Much of the area already has Colorado Roadless designation in place, which is consistent with managing disturbance at low levels with respect to wildlife needs.

Sanford Creek Montane WMA - This is adjacent to the busiest motorized recreation system of trails in the GMUG planning area, but still has viable habitat that is important for local wildlife populations extending from Taylor Park to the alpine along the Continental Divide. The remaining viable habitat is at risk from increased numbers and intensity of recreational users and user-created unauthorized trails. CPW recommends an evaluation of this area to determine if the route density can be strategically reduced to provide wildlife such as deer, elk, mountain goats, bighorn sheep, and moose security areas to avoid disturbance and displacement. CPW recommends no additional routes in this area. Much of the area already has Colorado Roadless designation in place, which is consistent with managing disturbance at low levels with respect to wildlife needs.

Sawtooth Montane/Alpine WMA -The Sawtooth Mountain and Agency Peak complex is the only non-wilderness designated area south of Gunnison that is still virtually unroaded. This area has significant value for wildlife, specifically summer/fawning/calving habitats for deer, elk, and moose. The area has potential lynx habitat, and is highly likely to be occupied in the near future (if not already) given the close proximity to the La Garita range. Any increased route density or recreational pressure could compromise the value of this area to wildlife. This area is unique in the opportunity it provides to hunters that seek out this area for a back-country experience removed from the major alpine areas that see high levels of trail-based recreation traffic. However, user-created unauthorized trails both within and outside of Roadless designated areas are beginning to show up, and enforcement work is needed to stop future damage to the area. CPW recommends inventorying and rehabilitating user created trails in the area in order to maintain its high wilderness values and existing uses. Much of the area already has Colorado Roadless designation in place, which is consistent with managing disturbance at low levels with respect to wildlife needs.

Mesa-Seco Alpine/Corridor WMA - Local CPW staff support this area to be managed to preserve its high wilderness values consistent with the adjacent Powderhorn and La Garita Wilderness Areas. This area is an important summer/fawning/calving range for deer, elk, and a growing moose population. CPW recently discovered that the lower elevations also serve as an important

link for a 45-mile elk/ deer migration corridor that runs between winter ranges. This area also provides important habitat for lynx, brown-capped rosy finch, Rocky Mountain bighorn sheep, and potentially habitat for Uncompahgre fritillary butterfly. The area currently has a seasonal motorized route closure on a trail that covers a large swath of alpine tundra. Currently, there is no way to prevent the incursion of motorists into the adjacent Powderhorn Wilderness. CPW r ecommends additional monitoring and enforcement efforts to stop future expansion of user[shy] created unauthorized off-road trails into alpine areas. Much of the area already has Colorado Roadless designation in place, which is consistent with managing disturbance at low levels with respect to wildlife needs.

Soap Creek Corridor WMA - CPW supports the WMA designation in the Soap Creek region based on the quality and quantity of wildlife habitat found in the area. The USFS has done an excellent job with Travel Management in Soap Creek, resulting in reasonable public access with only moderate habitat fragmentation. The WDRLMP contains a block of uHigh-Use Recreation Area" MA 4.2 (HIREC) mapped in lower Soap Creek within the WMA. The current high-use rec polygon appears too liberal; CPW would like to confirm and/or clarify that the polygon terminates at Commissary Campground (south of Commissary Hill/Jeep Hill). Furthermore, there is a disjunct polygon of high-use rec area mapped to the east of Soap Creek campground on the peninsula between Soap and West Elk Creeks. That polygon should be removed entirely as there is no high-use rec occurring in that geographic area, nor should it be encouraged.

It is important to point out that lower Soap Creek receives most use during the summer and fall, but comparatively little use during the winter and spring. The campgrounds are the main draw to the area (Ponderosa, Soap Creek, and Commissary) for Blue Mesa Reservoir users in the summer and big game hunters in the fall. CPW understands the need to provide the necessary infrastructure in this area for summer and fall users, but does not support increasing or encouraging year-round recreational use in the Soap Creek area during the winter or spring timeframes based on the big game winter range values in this area. The Soap Creek road is not maintained or plowed during winter, and the area is typically inaccessible to motor vehicles from January through May each year. There is occasional snowmobile use of Forest Road 721 during winter, mostly by mountain lion hunters; however, winter recreational use is currently minimal and should not be encouraged or expanded due to conflicts with existing wildlife use.

Carbon Creek Corridor, Red Mountain Corridor, Flat top East Corridor, Flat top West Corridor WMAs - As referenced in CPW's May 22, 2019 comment letter, there is a need to improve the precision of the WMA boundaries. The wildlife values of this WMA are well documented, and have been articulated in previous comments to the GMUG planning team. After reviewing the WDRLMP map of this WMA, CPW recommends extending the WMA to the Forest Service boundaries, or Roadless Rule area boundaries where it would increase administrative and/or ecological continuity. An example is on the southwest corner of the WMA adjacent to Ohio Creek; there are small blocks of General Forest mapped between the WMA and private lands. On the northwest corner of the WMA, there is a substantial tract of Roadless Area mapped, that could be incorporated into the WMA to increase the overall efficacy of the WMA. There is ample public access (motorized/mechanized) into these areas currently

therefore, a WMA emphasis should not impact current or future management. CPW also suggests incorporating the mountaintops in the WMA boundary to simplify administrative boundaries and benefit wildlife.

The Uncampahgre Plateau WMAs - The Uncompahgre Plateau is a unique landscape within the GMUG and southwest Colorado that ranges in elevations from 4500 feet to 10,338 ft. This large uplift consists of high percentage of mountain shrub community and aspen that provides quality habitat for wildlife. Habitat on the Plateau is generally not as resilient as other areas on the GMUG because the average annual precipitation is less. In addition, there are few road-free areas remaining on the Plateau to provide security from disturbance for wildlife. Private lands on the south end and along the eastern and southeastern side of the Plateau are being developed for agriculture, residences, and golf courses. This loss of habitat and the inevitable future loss of habitat further increases the value of the remaining unfragmented public lands on the Plateau as a stronghold for wildlife.

The Uncompahgre Plateau encompasses our D-19 and E-20, deer and elk herds. The elk herd is managed by

CPW for a quality elk hunting experience in GMU 61 with limited licenses and for opportunity in GMU 62, with over-the-counter licenses for archery and our 2nd and 3rd rifle seasons. Hunters are waiting for up to 25 years to draw a Unit 61 elk license. The deer herd is managed with limited licenses across the plateau and generally has fewer licenses in GMU 61 than in GMU 62 based mostly on animal distribution. The graph (Figure 1) below shows the deer population decline since 1980.

D-19 Posthunt Population Estimate

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Figure 1. Post-hunt population estimates of mule deer from 1980-2018 on the Uncompahgre

Plateau (DAU D-19).

Figure 2 illustrates the growth and then decline in elk population since 1980. It also illustrates that the calf recruitment, indicated as calf /cow ratio, has continued to decline.

E-20 Poslhunt Poputatlon and Observed Calf/Cow RatJos

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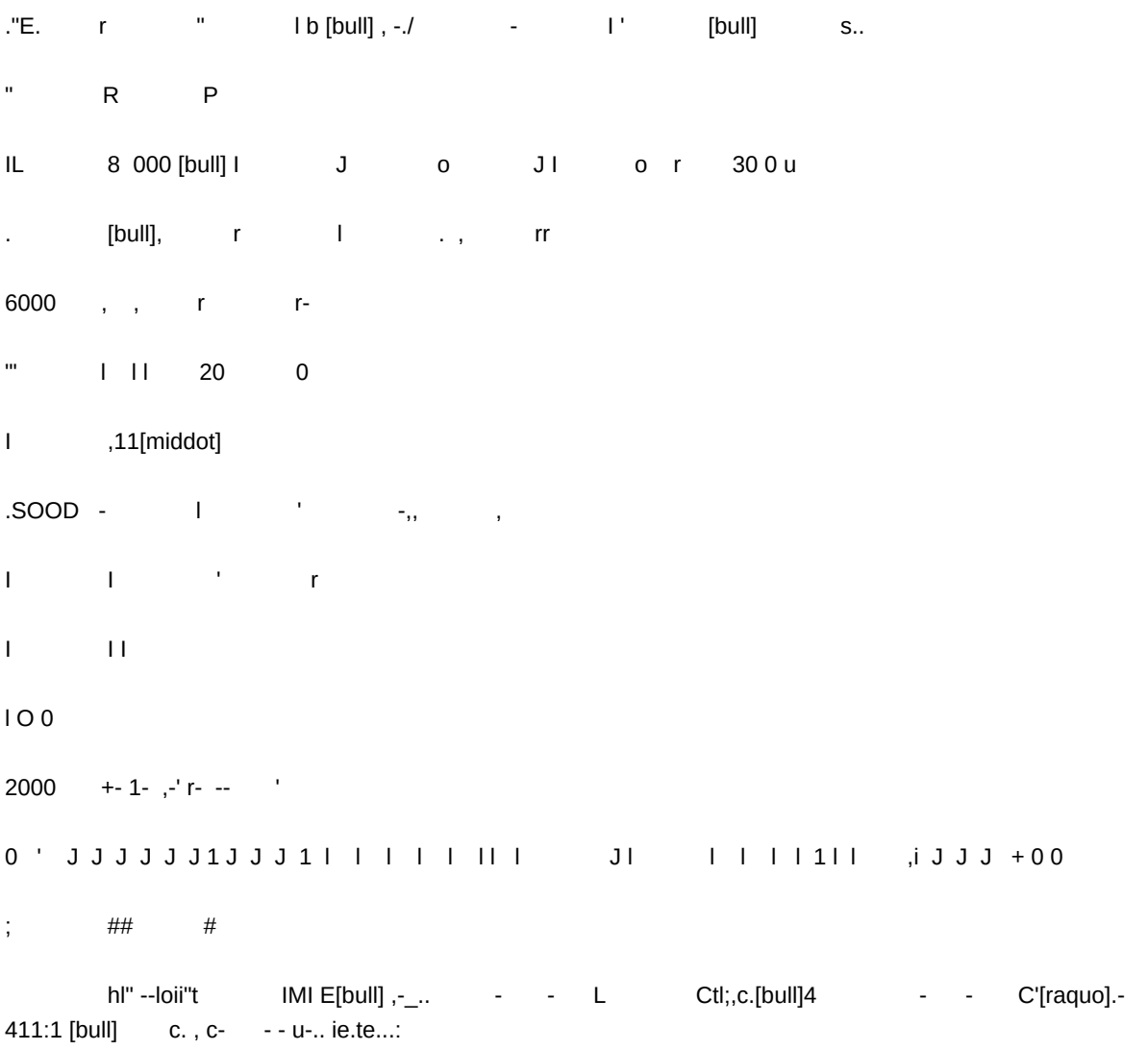


Figure 2. Post-hunt population estimates and observed calf:cow ratios from 1980-2018 on the Uncompahgre Plateau (DAU E-20).

Due to the population declines and low recruitment of juvenile deer and elk into the population, the numbers of deer and elk licenses have been reduced over the years. The decline in population numbers is associated with the drought impacts over the last 20 yea rs, loss of habitat to development, predation, competition for qua lity forage between deer, elk, and domestic grazers, and increased recreation forcing animals to lower quality ha bit at and onto priva te lands.

CPW strongly supports the inclusion of the Calamity to Unaweep and Kelso Mesa/Middle Point WMAs in the WDRL.MP by GMUG staff . In order to maintain existing mule deer and elk populations on the Uncompahgre Plateau, CPW also recommends adding the proposed Horsefly, Roubideau, Upper Tabeguach/ Cottonwood , Windy Point - 47 Creek, and Long Canyon-Cambell WMAs to the WDRL.MP. The proposed WMAs in GMU 61 reflect CPW's recognition of the significant efforts by USFS to reduce road densities in the Tabeguache,

Cottonwood and Hanks Va lley area over the last 20 years. If these areas see increases in trail/ road development and traffic, elk populations on the Plateau will be reduced and redistributed onto the adjacent private landst creating conflicts with landowners and inhibiting CPW's ability to meet our management goals. Due to the local and statewide significance of the Uncompahgre Plateau's big game population, CPW is considering nominating the Plateau as a high priority landscape for the State of Colorado's Action Plan for implementing Department of Inte rior Secretarial Order 3362, Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors.

Chapter 3 - Management Area Direction, High-Use Recreation Areas - MA 4. 2 (HIREC) p. 63

There is a High-Use Rec Area mapped in Mill Creek along FS Road 727. CPW concurs with that designation, and supports the use of that area by winter recreationists. During the winter months, most wildlife have migrated out of the Mill Creek drainage, therefore concentrated recreation should have minimal impacts. CPW recommends that the USFS not encourage or advocate for increased recreational use to the south of Mill Creek along Road 818 into the Antelope Creek drainage. Depending on winter severity, concentrations of elk and mule deer rely on winter range found in the Antelope Creek drainage. Wintering animals would be negatively impacted by increased recreational activity along Road 818, therefore no expanded recreational use should be encouraged in that area.

Additional Comments Regarding Recreation Opportunity Spectrum (ROS) Designations in the

WDRLMP:

Please reference CPW's letter dated May 22, 2019 for a more complete discussion relative to ROS designations and categorization. Additional comments for the WDRLMP include:

Summer ROS ,c-....., .. "11

Castle Creek/South Castle Creek, from Wilderness St re am su_bdivision - There is a substantial area categorized as Roaded Natural. This area is more accurately classified as Semi[shy] primitive Non-Motorized. The road beyond Wilderness Streams subdivision is an administrative route used by only two permitted users (livestock permittee & outfitter). There are no other permitted motorized users, and the administrative route is used infrequently during the summer and fall. The expectation for the average user is Semi-primitive Non-Motorized.

Flat Top Mountain - There are blocks of Roaded Natural on the west and southeast side that should be changed to Semi-primitive Motorized to be consistent with adjacent FS lands.

Winter ROS

Curecanti Creek - The Curecanti Creek drainage is categorized as Semi-Primitive Motorized. This area should more realistically be categorized as Semi-Primitive Non-Motorized. The Curecanti drainage (FS Rd 720) has almost no winter use and the user expectation is Semi[shy] Primitive Non-Motorized. We are unclear on why it received the motorized ROS designation.

Flat Top Mountain - There are blocks of Roaded Natural on the west and southeast side that should be changed to Semi-primitive Non-Motorized to be consistent with adjacent FS lands. Flat Top has a seasonal motorized closure that runs from December 15th through June 15th annually; therefore, no winter motorized designations should apply.

Chapter 4 - Monitoring (p. 65)

CPW supports increased monitoring across the GMUG. We continue to advocate for increased law enforcement staff, particularly in the Gunnison Ranger District. Increased use of public lands, and instances of increased access to public lands (i.e. paving Cottonwood Pass) necessitate increased law enforcement presence on GMUG lands. Many of the Adaptive

Management actions listed in Table 9 (pages 68-80) will be difficult to implement without persistent law enforcement presence. CPW encourages the USFS to add a Desi red Condition and/or specific Objectives for increasing District LEO staff within five years of implementing t he new Forest Plan.

Conclusion

In our May 22, 2019 commen ts on the PDRLMP, CPW noted some discrepancies in the WMA boundaries that need to be resolved. CPW will forward revised proposed WMA boundary shapefiles for your consideration as they are completed.

CPW appreciates the opportu ni ty to review the WDRLMP for the GMUG, and the consistent communication with GMUG staff on the pl anni ng process. We look forward to continued collaboration as a cooperati ng agency. If you have any questions or would like clarification on any comment in this letter please contact Southwest Energy Li ai s on , Jon Holst at 970- 37 5 - 671 .

Sincerely,

Cory Chick, SW Region Manager

xc: JT Romatzke, NW Region Manager, J Wenum, Area 16 Wildlif e Manager , Renzo Delpiccolo, Area 18 Wildlife Manager, Kirk Oldham, Area 7 Wildlife Manage r , Scott Wait, SW Re gion Senior Terrestrial Biologist, Brad Pet ch, NW Region Senior Terrestrial Biologist, John Alves, SW Region Senior Aquatic Biol ogist, Lori Martin, NW Re gion Senior Aquatic Biologist, Taylor Elm, NW Region Energy Liaison

COLORADO

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CPW

ATTACHMENT 1

May 22, 2019

Grand Mesa, Uncompahgre and Gunnison National Forests Samantha Staley

Forest Planner

2250 South Main Street Delta, CO 81416 gmugforestolan@fs.fed.us

RE: CPW Comments - Grand Mesa, Uncompahgre, and Gunnison National Forests Preliminary Draft Revised Land Management Plan (April 2019)

Dear Sam:

Thank you for the opportunity to provide cooperating agency comments on the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) Preliminary Draft Revised Land Management Plan (April 2019). Colorado Parks and Wildlife's (CPW) mission is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. This mission is implemented through our 2015 Strategic Plan1 and the goals it embraces which are designed to make CPW a national leader in wildlife management, conservation, and sustainable outdoor recreation for current and future generations.

CPW provided written comments on the subject matter assessments prepared as part of this planning effort on December 8, 2017, January 26, 2018, and March 9, 2018. In addition, CPW provided written scoping comments on June 1, 2018, comments on the Wilderness Evaluation Report on October 1, 2018, and comments on the Wild and Scenic River Eligibility Evaluation on March 22, 2019.

In our previous comments, CPW expressed concern over the failure to accurately characterize wildlife-related recreation and its socioeconomic importance in the context of other forms of recreation on the GMUG. We also expressed concern over the potential for fish and wildlife populations and wildlife-related recreation opportunities to be negatively impacted by increasing motorized and non-motorized trail densities and higher intensity trail-based recreation. CPW recognizes and appreciates the substantial efforts by GMUG staff to address these concerns and many of our comments. We greatly appreciate GMUG planning staff's incorporation of Wildlife Management Areas with route density standards into the Preliminary Draft Revised Land Management Plan (PDRLMP). These Wildlife Management Areas will benefit wildlife and wildlife-related recreation and help CPW achieve its mission.

1 Colorado Parks and Wildlife 2015 Strategic Plan (November 2015)

http://cpw.state.co.us/ Documents/ About/ StrategicPlan /201SCPWStrategicPlan-11[middot]19[middot]15.pdf

Jeffrey M. Ver Steeg, Acting Director, Colorado Parks and Wildlife [bull] Parks and Wildlife Commissicri: Taishya Adams[bull] Robert W. Bray -charles Garcia [bull] Marie Haskett Carrie Besnene Ha r [bull] Jahn Howard, Chair[bull] Marvin .[frac14]:Daniel[bull] Luke B. Schafer[bull] Eden Vardof [bull] James Vigil, secretary[bull] Michelle Zimmerman, Vice-Chair

Please consider the following comments on the PDRLMP:

General PDRLMP Concerns. Despite significant progress on the sub ject matter assessments and PDRLMP, CPW r emains concerned that we are not able to track many of our comments on the subject matter assessments into specific plan components, including Desired Conditions, Objectives, Standards and Gui delines. The current PDRLMP lacks clear references to many of the subject matter assessments upon which it is based. CPW recommends providing more explanation and information regarding the link between the PDRLMP and the subject matter assessments that have been completed, and how they will be used and adapted over time.

Wildlife Management Areas and Interactive Story Map data layers. In many i nstances, the Wildlife Management Area boundaries provided by CPW were rough approximations. CPW's rough approximations contrast the more precise polygon boundaries provided for other management zones (i.e., the Continental Divide Trail buffer) displayed in the interactive story map. CPW would like to assist the GMUG planners and clean up some of the Wildlife Management Area boundaries to make them more precise. This effort would remove some of the smaller polygons formed when intersecting CPW's coarse Wildlife Management Areas with other polygons used in the development of the management areas. In the example map below, the "Wildlife Management/Co Roadless Area" shown in dark blue could be expanded to i nclude the "CO Roadless Area" shown i n purple just to the west. This boundary ali gnment is important as we have already received comments from the public concerning the suggested polygons we provided to the GMUG.

Note that CPW will be improving the delineations of priority wildlife areas over the next five years, in particular with respect to elk, deer, bighorn sheep, and moose. The improvements will be based on: 1) new Herd Management Plans, 2) modeling/mapping of ungulate distribution via collar data, and 3) crucial habitat prioritization mapping. CPW recommends incorporating language in the Plan that allows for some degree of adaptive management to the Wildlife Management Area boundaries to accommodate these updates.

Part I: Social and Economic Environment Socioeconomics (pg 8)

FW-DC-SCEC-O1: Please include sustainable wildlife populations as one of the commodities provided by the forest. Please also include hunting, fishing, and wildlife watching as recreational opportunities. Please see CPW's 12/8/17 comments on Socioeconomic Sustainability.

Recommended Additional Objective: Please add an objective that includes maintaining CPW's big game population objectives on the GMUG in order to provide long-term sustainable economic benefits to local communities.

Part II: Ecological Sustainability

Key Ecosystem Characteristics, Connectivity (pg 12)

FW-DC-TEV-18: Meeting this Desired Condition requires acknowledgement of anthropogenic activity as a barrier that increases habitat fragmentation for many species (lynx, big game, predators, etc.) and incorporation of specific Standards and Guidelines designed to preserve connectivity - such as seasonal or volume of use restrictions and facility density restrictions in known migrations routes or critical movement areas. In addition to the "see also Wildlife DC XX-XX and OBJ-XX" reference, connectivity desired conditions and objectives should also be incorporated into the rangeland plan components (i.e., fencing criteria), and transportation components (i.e., route density limits and mitigation (crossing structures) for high volume routes.

Please incorporate specific Standards and Guidelines designed to maintain habitat connectivity for large terrestrial wildlife (predators and big game) based on the best available science. CPW staff can assist with developing Standards and Guidelines.

Terrestrial Ecosystems and Vegetation (pg 14)

Please incorporate Desired Conditions, Objectives, Standards and Guidelines for sagebrush. While there are few large blocks of sagebrush on the GMUG, it is a significant vegetative component on the fringes of many tracts of GMUG lands.

Please incorporate a Desired Condition for Alpine Uplands to preserve security habitats for animal/insect species. The exposure and openness of Alpine Uplands lend them, and the species that use them, susceptible to disturbance from human act ivities . Visitor use of Alpine Uplands can be managed in a way that increases security habitat for wildlife. This may involve trail re-routes or limitations on visitor usage. FW-OBJ-TEV-25 references Recreation Management plans, and FW-GOL-TEV-27 references ground disturbance; CPW recommends incorporating specific Standards and Guidelines that address managing human activities and facility (trail) placement to minimize wildlife displacement and hab itat fragmentation in Alpine Uplands. Note that the bare soil/vegetation desired condition listed in the previous paragraph for Montane-Subalpine Grasslands (FW -DC-TEV-24) may also apply (or nearly so) for a desired condition in Alpine Uplands.

Fire management Emphasis Areas (pg 20)

In the list of Enhancement Emphasis Areas (pg 21), please add non-historic designated trails (i.e., Continental

Divide Trail). Given the management restrictions being considered for a 0.25 mile buffer of the t rail, natural ignitions could ease the burden placed on vegetation and wildlife management efforts in the future.

In the Protection Emphasis Areas (pg 21), please reference local community wildland fire protection plans where they exist.

Native species Diversity (pg 22)

FW-OBJ-SPEC[bull]69 (pg 23): Please include "increase contiguous habitats by removing redundant transportation routes."

FW-GDL-SPEC-72 (pg 23): Please incorporate specific design standards for facilities that are important to maintaining habitat connect ivity . For example, for fence designs please reference the design standards found in CPW's Fencing with Wildlife in Mind (2009), htt ps: / / cpw.state.co. us/Documents/LandWater/ Priv atel andPr ogram s/ Fe ncingWithW ildlife l nMind. pdf. CPW can also provide species-specific route density standards to maintain habit at connect ivity .

FW-GDL-SPEC-73 (pg 23): Please change this guideline to a stand ard, and incorporate reference to the specific disturbance buffers described in CPW's Recommended Buffer Zones and Seasonal Rest ric tions for Colorado Raptors (2008).

FW-DC-SPEC- 80 (pg 25): Please incorporate a Desired Con dit ion of ma int ainin g CPW's herd management objectives in order to provide sustainable big game populat ions and quality hunting opportunities that, in turn, provide long-term sustainable economic benefits to local communities.

FW-ST ND-SPEC-81 (pg 25): CPW recommends placing bighorn sheep Desired Condit ions, Objectives, Standards, and Guidelines in the At-Risk Species Section, not the big game

section. Note that Standards and Guidelines for effective separation between domestic and bighorn sheep should include specific buffer distances for Tier 1 and Tier 2 herds and be consistent with the bighorn sheep addendum/appendix that is under development.

FW-STND-SPEC-82 (pg 25): CPW recommends applying this Standard in addition to, not instead of, specific buffer distances for Tier 1 and Tier 2 herds.

FW-GDL-SPEC-83 (pg 25): CPW recommends converting this guideline to a Standard. Note that there is a new CPW Species Activity Map (SAM) update scheduled for summer 2019 that CPW can provide to GMUG planners.

FW-GDL-SPEC-84 (pg 26): CPW recommends defining security habitat in terms of vegetative type composition. For elk, this would include areas free of roads and trails as well as forest patches >250 acres. In some cases, the forest patch size could be decreased if other disturbances (via roads and trails) are not influencing. In some cases, large patches of open non-forested areas serve as refuge to elk if the concern is predators.

Recommended Additional Big Game Objective (pg 26): Over the life of the GMUG plan, remediate 50% existing fence to a wildlife friendly state. This includes the removal of defunct fencing spans or implementing current best management practices documented in "Fencing With Wildlife in Mind0 (CPW 2009) on existing or new fence sections. Site-specific issues include: raising the bottom strand between select fence posts of pronghorn habitat (Cochetopa hills/pass area) and using a PVC pipe "goat bar,0 lay-down sections, or drop-down

segments between posts, and converting old, mesh sheep fencing to wildlife friendly 4-strand barbed wire to ease access for juvenile ungulates.

FW-GDL-SPEC-85 & FW-STND-SPEC-86 (pg 26): CPW recommends placing these Standards and Guidelines pertaining to boreal toad and Gunnison's prairie dog under the At-Risk Species section. Note that non-native plague is one of the greatest limiting factors to Gunnison's prairie dog conservation. Please add a new Standard or Guideline for Gunnison's prairie dog that requires CPW and the USFS to cooperate on a plague vaccine delivery program to conserve Gunnison's prairie dog colonies.

At-risk Species (pg 26)

CPW will provide additional comments when species of conservation concern list is final and the At-Risk Species section is completed. CPW recommends that the PDRLMP reference the recently completed State Wildlife Action Plan for a list of At-Risk Species and potential threats.
https://cpw.state.co.us/aboutus/Pages/StateWildlifeActionPlan.aspx

CPW recommends moving bighorn sheep to this At-risk Species section.

CPW recommends incorporating Colorado River Cutthroat Trout as a species of conservation concern in the At-Risk Species section. CPW would like to insure that the plan properly

addresses Cutthroat Trout conservation and is happy to comment as soon as this portion of the plan is available for review.

Recommended Additional Objective: Create, update, or obtain (if already available) species distribution maps (i.e., habitat suitability, niche modeling) for 25% of the species listed in the GMUG's list of species of conservation concern every 5 years. This information is critical for applying a science-based and objective approach to quantifying the degree of impact that future land-use decisions have on wildlife.

FW-GDL-SPEC-113 (pg 30): CPW highly encourages this seasonally closure to maintain the Gunnison sage - grouse population.

FW-GDL-SPEC-114 (pg 30): CPW recommends incorporating a Standard or Guideline referencing the best available science as it exists today. For Noise disturbance thresholds for grouse, see Blickley et al. (2012) Experimental Evidence for the Effects of Chronic Anthropogenic Noise on Abundance of Greater Sage Grouse at Le ks. Conservation Biology 26 (3): 461-471.

Part Ill. Multiple Uses and Ecosystem Services of the Forests Designated Trails (pg 34)

Continental Divide National Scenic Trail (CONST)

Desired Conditions and Objectives: Please add an additional Desired Condition and specific Objective tied to maintaining wildlife security and distribution along the CONST. Many species, including mule deer, elk, bighorn sheep, mountain goat, and moose, rely on high elevation habitats along the CONST in the late spring/summer/fall to achieve optimum body condition, and raise robust young. Unregulated increased interest and use of the CONST over time is likely to result in the displacement of big game into less optimal habitats, particularly in alpine habitats where security is compromised by open landscapes and high volumes of trail users.

FW-OBJ-DTRL-145 (pg 34): Please incorporate in this Objective a desire to minimize road and trail densities and maintain habitat connectivity and wildlife security areas along the CONST.

FW-GDL-DTRL-150 (pg 35): CPW recommends incorporating a similar Guideline to address the impacts of management activities on wildlife security and distribution along the CDNST. Habitat manipulation and management along the CONST may be warranted to address concerns regarding wildlife security and displacement. Scenery manage me nt techniques are not likely to be effective for addressing wildlife security and displacement.

FW-GDL-DTRL-157 (pg 35): CPW recommends incorporating a similar Guideline that exempts habitat manipulation to improve or restore wildlife migration corridors and habitat (ungulate and Canada lynx). The volume of CDNST users will likely lead to

increased fragmentation of the habitat. Habitat manipulatfon may be used to minimize this impact and help to mitigate the impacts of increased trail user volumes on wildlife. Restoring/maintaining wildlife migration corridors and habitat that cross the CONST will helps preserve the integrity and character of the CONST in itself.

Recommended Additional Objective for CONST: Develop a system for monitoring visitor volume/usage of this trail within two years following the release of the Final Forest Plan, to guide management decisions and promote sustainable trail use and maintenance.

Energy and Mineral Resources (pg 36)

Recommended Additional Desired Condition or Objective: Energy and mineral development activities on the GMUG are planned and conducted in a manner to avoid impacts, and to minimize and mitigate the extent and severity of impacts that cannot be avoided (this is consistent with legislation recently authorized by the Colorado General Assembly through SB19-181).

Recommended Additional Standard of Guideline: Incorporate lease stipulations and/or mineral development conditions that provide for development planning to avoid, minimize, and mitigate impacts to wildlife resources, such as CPW's Recommended Lease Stipulations for Oil and Gas within the State of Colorado (2010).

Lands and Special Uses (pg 40)

Recommended Additional Desired Condition: Recognizing that the ecosystem characterizing the GMUG covers a larger extent than the GMUG property boundaries, all GMUG land management activities are considered within the context of the management activities of neighboring public lands managed by, but not limited to, Bureau of Land Management, National Park Service, State of Colorado Lands, and neighboring forests.

Range (pg 42)

FW-OBJ-RNG-199 (pg 42): Maintaining 10% of fencing every 10 years is not adequate to maintain functioning fences and prevent trespass grazing. CPW recommends a more substantial Objective and maintenance schedule to maintain fences. (See recommendation for an additional Big Game Objective on page 5 of this

comment letter).

Recommended Additional Objective: CPW recommends adding an Objective to provide forage and residual cover for wildlife consumption, hiding, and nesting cover. It is particularly critical to adjust stocking rates while drought conditions persist and vegetation is slow to recover. In drought conditions wildlife populations get a smaller portion of the available vegetation production when stocking rates remain unchanged. This has negative consequences for wildlife.

FW-G0L-RNG-208 (pg 43): Please incorporate a specific reference to wildlife-friendly fencing practices and CPW's publication "Fencing with Wildlife in Mind" (CPW 2009).

Recommended Additional Objective: Domestic sheep allotments with a medium or high risk of contact with btghorn sheep will be evaluated for a broad range of alternative management actions to minimize risk of contact.

Recommended Additionat Standards and Guidelines: CPW recommends incorporating as Standards and Guidelines the speciftc management recommendations for land management agencies found in the WAFWA Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat (Western Association of Fish a nd Wildlife Agencies, Wild Sheep Working Group. 2012).

Recommended Additional Standard: Vegetation monitoring of allotments shall be conducted on an annual basis at a statistically representative sample of sites following sampling methodologies similar to the BLM AIM program. If the monitoring indicates that vegetation production is declining beyond the annual 10[bull]yr average or curing out earlier than the 10-yr average, then reduced stocking rates will be implemented within 30 days to minimize the likelihood of exceeding desired utilization rates or decreasing available forage for native wildlife for consumption, hiding, and nesting re quire me nts .

Recreation (pg 44)

FW-DC-REC-213 or Additional Desired Condition: CPW recommends adding language to reflect that recreational activities, particularly those outside of recreation emphasis management areas, be planned and conducted in a sustainable manner that does not degrade or adversely impact other forest resources, including wildlife.

FW-OBJ-REC-214 (pg 44): Access portals do not completely mitigate ecological impacts associated with increasing use. In some cases, the improve d infrastructure at access points may draw more human visitation. Increased volume of users on the trail results increased disturbance and displacement of wildlife. This is important as many of these trails dissect ungulate summer and birthing habitats that are critical to main t aining wildlife population s. With the increased inte rest in climbing 14,000 ft peaks, CPW recommends including language describing the potential need for future use lim itations and regulations to address crowding and unacceptable ecological impacts; similar to the language included in FW-STND -REC-217.

FW-GDL-REC-219 (pg 45): The ROS designation in many areas is based largely on current established roadways/routes. As written, this Guideline does not allow for management activities to move an area to a more primi ti ve ROS setting. This Guideline could interfere with a project designed to improve the road system to be more sustainable. Proposals to realign/reroute a particular trail wit hin a designa t ed Wildlife Management Area to increase security areas for wildlife could also potentially change the ROS to a more primitive level. CPW recommends deleting this Guideline or modifying it to allow for management activities that potentially improve habitat conditions and result in a more primitive ROS designation.

FW-GDL-REC-221 (pg 45): CPW recommends adding to this Guideline a provision requiring that special use events be avoided during high use big game hunting seasons. CPW staff can assist determining the highest use hunting seasons for a particular area.

Recommended Additional Objective: Within five years following the release of the Final Forest Plan, implement a program for monitoring visitor volume/usage in each management zone. This monitoring system or would be part of a larger visitor volume/usage monitoring system GMUG wide.

Recommended Additional Guideline: New trails proposed in semi-primitive areas will be evaluated and planned in a manner that minimizes fragmentation of wildlife habitat and wildlife movement corridors between Wildlife Management Areas (and Wilderness Areas).

General Comments regarding Table 6 (pg 46) and application of ROS:

Before ROS is applied, CPW recommends that road systems and associated ROS polygons be mapped more accurately, and that the terrain barriers are considered more precisely. Please consider the following examples where revisions may be appropriate:

[bull] The ridge between Texas Creek and Cottonwood pass provides and natural feature that could be used to define the break between Roaded Natural (centered over the new paved road) and Semi-primitive Motorized to the north.

[bull] Various small ROS polygons exist that are odd, fragmented, or are not readily accessible public access. The example figure map centered over the Cathedral area (Spring and Cebolla Creeks) demonstrates a Roaded Natural designation along the bottom of spring creek inaccessible to the public, as well as another questionable Roaded Natural designation that appears to be primarily based on USFS boundary overlapping a county road for a short 400 m segment.

[bull] Semi-primitive Motorized: While examining the ROS designations more closely via arcmap, CPW discovered that there are some issues with several areas designated as "Semi-primitive Motorized" (development scale = 2). Many of the routes lying within these areas are closed, admin only, or land-locked (inaccessible accept from other public land) routes. One example of a closed route includes FS-913 (Irby Gulch). One example admin route includes FS 677.6 (Powerline Admin Route parallel to monarch pass). CPW recommends re-evaluating these areas.

[bull] Roaded Natural: CPW also discovered issues with a number of areas designated as "Roaded Natural" (development scale = 2-5). Several of the areas labelled "Roaded Natural" do not fit the setting description with regard to "The road system is well defined and can typically accommodate passenger car travel", and "During the winter, the road system is plowed to accommodate passenger car travel. Winter trails are likely groomed...". Examples of routes not fitting to be Roaded Natural designation include: a variety of spurs off of FS-724 (Rainbow Lake Rd), FS-728 (Castle Crk - private access

point), FS-737 (Carbon Creek), FS-829 (Red Mountain), FS-954 (Mitzel), FS-860 (Almont Powerli ne), FS-810 (Triangle Almont), FS-773 (Closed-route Fisher), 6061.B (Etsy), FS- 743.4B (Canyon Spur), FS-604.1A (Sheeps Gulch), FS-604 (Cabin Creek Cow Camp), FS- 604.A1 (Branch 2 - Closed Route), FS-738.2A (Winter ROS - West Brush), FS-759 (Winter ROS - Italian Creek), FS-374, FS-766 (Halls Gulch), FS-879 (West Mountain), FS-772 (Wiley Gulch), FS-237 (Old Monarch Pass), FS-780 (Long Branch), FS-578.2A (Sargents Mesa - admin and closed routes comprise some of the route density), FS-781.2A (Needle Cr Spur), FS-803 (Myers Gulch), FS-804.1F (Cochetopa Park Spur F), BLM-3323 (Nellie Crk Rd), FS-467 (Bonholder - private access point), FS-464 (Winter ROS - Cannibal Plateau), FS-457 (Winter ROS [middot] Brush Cree k).

Most of these routes are only designated as primitive (high-clearance vehicle) roads in travel management planning, or in other cases appeared to involve a road density calculation including closed or admin only routes. If these areas are designated as Roaded Natural ROS, it will be difficult to get approval to restore (reroute, realign) or close routes in these areas in the future. In some cases, these Roaded Natural ROS desi gnations spatially overlap with Wildlife Management Areas where reroutes or road closures may be desirable.

It appears that many of the Roaded Natural designations were based primarily on a currently high road density, in which a system of parallel roads or spurs radiate out from the primary road listed. In the listed examples above, we believe the road density was too high to begin with in terms of necessary law enforcement activities and ecosystem resiliency. One particular example of a very large ar ea labelled Roaded Natural, rather than Semi-primitive Motorized is the area between FS-788 (Los Pinos Pass Rd), FS-790 (Big Meadows) and FS-794 (Cochetopa Creek Rd). While some of these are passenger car roads, most of the spurs are high-clearance vehicle or closed segments. With this area currently receiving high intensity logging, it is our understanding that many of these routes will be closed after logging operations are completed. Therefore, the large area of Roaded Natural ROS may not fit that characterization into the future, and may fi t better in one of the Semi-primitive ROS designations. CPW recommends re-evaluating the ROS designations in this area.

[bull] Roaded Natural adjacent to Wildlife Management Areas: Based on our current knowledge of indirect impacts and displacement of wildli fe near roads and trails, CPW is concerned that a Roaded Natural designation adjacent to or bisecting a Wildlife Management Area could greatly reduce wildlife use of a Wildlife Management Area. If additi onal trails or routes are built near the boundary of a Roaded Natural polygon adjacent to a Wildlife Management Area, displacement of wildlife in the Wildlife Management Area will occur. Therefore, we suggest that the ROS within [frac12] mile of desi gnated Wildlife Management Areas and Wilderness, but not to within 100 m of the current linear road features, receive a Semi-primitive (development scale <2) designation or lower. This would effectively shrink the Roaded Natural polygon designation around FS-743 (Lost Canyon Rd), FS-880 (Dark Gulch), Cnty Rd 209

(Cottonwood Pass), FS-584 (Sanford Crk), FS-632 (Red Buck), and Kebler Pass (along Raggeds Wilderness boundary).

Timber and other Forest Products (pg 49):

Recommended Additional Guideline: To prevent displacement of wildlife from large long[shy] term forest management projects (i.e., the currently proposed Taylor Park veg project), work (logging, thinning, salvaging, etc) will be scheduled to move through the larger geographic area focusing on a smaller contiguous concentrated tracks of land each year. A certain percentage of larger landscape will be treated each season proportional to the duration of the project (i.e., 10 year project would equate to 5-15% of the land being disturbed each year). Ensuring that work activities are predictable both spatially and temporally will help mitigate some of the wildlife

displacement. Annually, timber management work will only be scheduled where those activities will not adversely impact wildlife; particularly avoiding from December 1st through April 30th.

Eligible Wild and Scenic Rivers (pg 51):

CPW will provide additional comments when the eligibility study is completed.

Chapter 3: Management Area Direction

Wilderness and Areas where Natural Processes Dominate (MA 1)

FW-STND-WLDN-256 (pg 54): Please include an exemption for drone use for wildlife survey purposes with an approved Minimum Requirement Decision Process (MRDP) document.

Recommended Additional Guideline: Wildlife surveys in designated wilderness may use techniques such as placement of non-permanent GPS or radio-telemetry collar transmitters deployed via helicopter capture, provided that a MRDP is completed in consultation with GMUG staff.

Special Areas and Designations (MA 2) Special Interest Areas (pg 54):

CPW recommends clarifying what constitutes a Special Interest Area. The wording for desired condition (Page 54 - FW-DC-SIA-261: 0 Special interest areas preserve the characteristics for which the areas are established") is open-ended without a better understanding of what this designation means and the scope of activities covered under the designation.

FW-DC-SIA-261 (pg 54): CPW recommends revising this desired condition to more accurately reflect the specific range of purposes for which a special interest area may be designated.

Natural Areas with Focused Management

Wildlife Management Area (pg 56)

General Comment regarding Mapping of Wildlife Management Areas:

Thank you for incorporating the Wildlife Management Area concept into the Preliminary Draft Plan. Please consider the following revisions and additions to the polygons provided on your web page:

[bull] CPW recommends that the USFS lands mapped as CO Roadless Area bordering the north side of the continental divide on south slopes of the Lake Fork Drainage be considered zoned as Wildlife Management

Area due to its importance as summer production habitat for deer and elk, and as habitat for a Tier 1 bighorn sheep herd (533). This area serves as a bighorn sheep migration corridor between the south and northern portions of the Tier 1 bighorn sheep herd (S33). It also serves as one of the first known occupied lynx and denning habitats. CPW recommends managing this area to limit access to existing routes and increase monitoring and enforcement so that no unauthorized trails are constructed. See Wager Creek West from Table 1 - CPW Wildlife Emphasis Areas and USFS Wilderness Evaluation, submitted with CPW Wilderness Evaluation Report comments on October 1, 2018.

[bull] CPW recommends that the USFS land mapped as General Forest and CO Roadless Area south of the West Elk Wilderness be considered a Wildlife Management Area. Given the extensive habitat/fuel treatments planned for this area in the near future by USFS and other partners, it has tremendous potential for providing high quality big game (elk, bighorn sheep, mule deer) in the future. The land currently designated as "General Forest" areas has the potential to be fragmented if future road and trail densities increase. Under the designation as a Wildlife Management Area the current road system could be redesigned to ensure adequate security habitat for elk and improve the distribution.

[bull] CPW recommends that an area mapped as General Forest (north of Highway 50, just west of Sargents) and Colorado Roadless Area (south of Highway 50, just Southwest of Sargents), and extending west to the south side of Tomichi Dome be considered as a Wil dli fe Management Area. This area is important to ungulates throughout the year, is a cri tic al migration corridor for elk, and consists of Critical Habitat for Gunnison sage[shy] grouse. CPW supports the 2010 USFS Decision Record for reduced motorized use in this area and that the travel and recommends that recreational use in this area be kept at the current standard as both hunter and recreation access is sufficient based on existing routes. See Dawson Gulch Montane from Table 1 - CPW Wildlife Emphasis Areas and USFS Wilderness Evaluation, submitted with CPW Wilderness Evaluation Report comments on October 1, 2018.

[bull] CPW recommends that all General Forest areas on FlatTop Mountain be changed to Wildlife Management Area due to its importance for Gunnison sage-grouse and wintering big game. See Flat Top West and Flat Tip East Corridor from Table 1 Table 1 - CPW

Wildlife Emphasis Areas and USFS Wilderness Evaluation, submitted with CPW Wilderness Evaluation Report comments on October 1, 2018.

[bull] CPW recommends that Kannah Creek Basin remain primitive and non-motorized, preferably non-mechanized. The area provides a unique roadless area in the otherwise heavily roaded Grand Mesa. For this reason, it provides critical security for terrestrial wildlife and also provides high quality habitat for aquatic species. In order to maintain existing road and trial densities and the unique characteristics of this area on the Grand Mesa, CPW recommends that the Kannah Creek drainage below the rim of the Grand

Mesa be managed as a Wildlife Management Area for foot and horseback travel only. See

Kannah Creek Drainage from Table 1 - CPW Wildlife Emphasis Areas and USFS Wilderness Evaluation, submitted with CPW Wilderness Evaluation Report comments on October 1, 2018.

FW-STND-WLDF-270: Due to substantial distance effects and displacement of some species from roads and

trails, CPW recommends incorporating into the route density calculation a buffer to account for the displacement of wildlife from roads and trails adjacent to designated Wildlife Management Areas. This will help achieve FW-DC-WLDF-269 and ensure that the functional route density within designated Wildlife Management Areas is maintained at the desired level.

Recommended Additional Guideline: A system for monitoring route user volume/usage in Wildlife Management Areas will be implemented within two years following the release of the Final Forest Plan. This monitoring system or would be part of a larger visitor volume/usage monitoring system GMUG wide.

Recreation Emphasis Management Areas (MA 4)

Mountain Resorts (pg 56):

General Comments on Mapped Mountain Resort Areas:

[bull] An area designated General Forest on the southeast slopes of Mt Crested Butte is already under plans for expansion (Teo Park and Teo Drainage), but is not currently mapped as Mountain Resort Area. CPW recommends re-evaluating the mapping for this area.

[bull] The NW, NE, and SE quadrants of Snodgrass Mtn are mapped as a Mountain Resort Area, and appear to correspond to another Crested Butte Mountain Resort Expansion. This area is important for ungulate birthing and is an important migration corridor for elk. Elk using this area are already cut off from utilizing a migration corridor that once ran between the slate river and Mt. Crested Butte. In order to maintain elk use of this area, CPW recommends re-evaluating whether it is more appropriate to designate it a special interest area like the neighboring areas to the north and east. Alternatively, the area could be considered as a General Forest management area.

High-use Recreation Management Areas (pg 58):

General Comments on High-use Recreation Management Areas:

[bull] CPW recommends that the General Forest areas with Suitable Timber Production directly south of Table Mountain bordering the Rio Grande NF be changed to an Area to be Analyzed as Wilderness/CO Roadless. Designating a High Use Recreation Area in this area will have significant impacts on wildlife due to particularly high quality elk calving habitat on middle section of Table Mountain. On the east and west ends of the mountain primitive roads currently exist, impacting elk distribution and making the south side and middle portion of the mountain more impo rtant . CPW strongly recommends reconsideration of the proposed High Use Recreation Area in this location.

[bull] The area at the base of beaver creek is currently not heavily used, but mapped as a High-use Recreation Management Area . The ROS is currently semi-primitive motorized with only one looping trail (single-tracked motorized). It is an important access point for hunters that utilize it at a low to moderate de nsity. This area is part of the larger upper Gunnison to Crested Butte ungulate migration corridor, linking elk and deer winter ranges to summer ranges. CPW recommends maintaining, but not expanding, the existing trail network and access in this area.

FW-GDL-REC-286: CPW recommends adding a bullet to "Restrict use to designated trails and reclaim user-created trails to prevent resource damage."

Recommended Additional Objective: Annually inventory routes and trails in High-use Recreation Management Areas to monitor the proliferation of user-created trails and prioritize trail maintenance and reclamation activities.

Chapter 4. Monitoring

General Comment on Monitoring: The Forest Plan will rely heavily on Law Enforcement presence and compliance monitoring to achieve the stated Objectives, Standards and Guidelines. Colorado's human population is expected to grow throughout the life of this plan, resulting in an increased demand for GMUG resources and opportunities. CPW strongly encourages the GMUG to explore ways to increase its Law Enforcement staff to ensure that the new Plan is implemented as intended, and foster the monitoring efforts outlined in this section.

20. Table 8 Monitoring questions and indicators (Page 63 - 75).

Page 63 - Row 1 lndicator(s): Spatio-temporally explicit user volume data for each particular management area/zone of the GMUG can be used for host of Standards and Guidelines for other plan components. This include basic user satisfaction, recreation impacts on ecosystems (i.e., wildlife), and other stakeholder groups (i.e . , ranchers, timber harvesters). CPW recommends adjusting NVUM sampled sites to be able to quantify visitor usage by each management area/zone.

Page 63 - Row 2 lndicator(s): Please add (5) ubuilt but unauthorized/user-created /social/ illegal routes"

Page 64 - Row 1 lndicator(s): Similar to documenting user volume, CPW recommends adding an indicator for the number and/or density of dispersed camp sites for each management area and time period across the GMUG.

Page 65 - Row 2 lndicator(s): CPW recommends adding an indicator for annual fishing days, hunting licenses, and outfitter days, and total annual economic contribution of hunting, fishing, and wildlife watching. It is important to note that big game meat harvested for each CPW Game Management Unit on the forest is a commodity that has intrinsic value (like timber) and also provides significant secondary economic benefits. This highlights that healthy big game populations and hunting provide more than just a recreational opportunity.

Page 66 - Row 3 Adaptive Management Actions: CPW recommends that adaptive management actions include reducing stocking rates, deferring grazing to a later opening date, adjusting allotment closing dates, temporarily closing active allotments, and adjusting allotment boundaries if necessary to address conflicts with wildlife.

Page 71 - Row 1 lndicator(s): CPW recommends that range condition and trend have objectively quantified (measured) metrics to assess changes. For instance: % bare-ground measurements, grass stubble height, shrub browsing intensity metrics. CPW recommends range conditions be objectively monitored and assessed annually during the active grazing season to effectively manage stocking rates and prevent overutilization.

Page 74 - Row 2 lndicator(s): Elk, mule deer, and bighorn sheep mapped areas provided by CPW (Species Area Maps: SAM) are not recommended to be an indicator, as they only represent the occupancy of animals, and do not provide a representation of vitality such as the way an abundance or density estimate would. The SAM polygons are not drawn at a scale fitting to the Associated Plan components in relation to providing big game

security areas. CPW recommends using CPW's 3 or 5 year average abundance estimate in comparison to CPW's Herd Management Plan objectives (https:/ /cpw.state.co.us/hmp).

Page 74 - Row 2 Adaptive Management Actions: Establish inter-agency collaborations to monitor ungulate movement and distribution data via radio-telemetry to assess spatial distribution in relation to big game security areas. Manage road closures and/or trail density and seasons of use to improve big game distribution and use of security areas. Monitor forage conditions annually and reduce livestock numbers as needed to provide sufficient forage, nesting, and hiding cover for wildlife.

Page 75 - Row 1 lndicator(s): Similar to the comment for pg 74- row 2 (big game) the occupancy of Gunnison sage-grouse across the landscape (via mapped polygons) is not as important as the abundance or density of sage-grouse. CPW recommends using the count of grouse on leks as better indicator. Contact CPW for annual Lek count data.

St ate and Local Direction (pg 162)

CPW suggests adding the following agreements to State and Local Direction:

[bull] Conservation agreement for Col orado River cutthroat trout (Oncorhynchus clarkii pleuriticus) in the States of Colorado, Utah, and Wyoming. (June 2006)

[bull] Conservation strategy for Colorado River cutthroat trout (Oncorhynchus clarkii pleuriticus) in the States of Colorado, Utah, and Wyoming (June 2006)

[bull] Range-wide conservation agreement and strategy for roundtail chub Gila robusta, bluehead sucker Catostomus di scobolus , and flannelmouth sucker Catostomus latipinnis (September 2006)

[bull] Conservation plan and agreement for the management and r ecovery of the Southern Rocky Mountain population of the boreal toad (Bufo boreas boreas) (February 2001)

[bull] Policies and guidelines for fish and wi ldli fe management in Nati onal Forest and Bureau of Land Management Wilderness (as amended June, 2006)

Conclusion

CPW appreciates the opportunity to review the Pr eli m i n ar y Draft Revised Land Management Plan (PDRLMP) for the GMUG. We conti nue to be encouraged by our positive working relationship wit h GMUG staff, and we look forward to continued coll aborati on as a cooperating agency.

The PDRLMP is a substantial document. We hope that our comments on the PDRLMP are helpful in the context of our previously st at ed concerns and recommendati ons on the subject matt er assessments completed by GMUG staff. CPW recommends an in -person joint review of our comments so that both GMUG and CPW staff better underst and the content of our comments and how they will be int egrated into the PDRL.MP.

tf you have any questi ons or would like clari fi cati on on any comment in this letter please contact So u t h west E n er gy Li ai so n , Jon Holst at 970 - 37 5 - 67 1.

Sin cerely,

Heath Kehm, Acting SW Region Manager

xc: JT Romatzke, NW Region Manager, J Wenum, Area 16 Wtldlif e Manager, Renzo Delpicolo, Area 18 Wildlife Manager, Kirk Oldham, Area 7 Wildlife Manager, Scott Wait, SW Region Senior Terrest riat Biologist, Brad Petch, NW Region Senior Terrestrial Biologist, John Alves, SW Re gion Senior Aquatic Biologist, Lori Martin, NW Region Senior A