



COLORADO

Parks and Wildlife

Department of Natural Resources

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US Forest Service
PO Box 620
Silverthorne, CO
80498

December 21, 2021

Attn: Adam Bianchi, District Ranger c/o Ashley Nettles
Re: Swan Mountain Project EA

Dear Mr. Bianchi and Ms. Nettles,

Colorado Parks and Wildlife has reviewed the documents for the Swan Mountain Project EA. As you are aware, CPW's statutory 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 strategic stewards of Colorado's natural resources. One way we achieve this mission is to review and comment on Environmental Assessments such as this.

The Proposed Action comprises of the following 8 items:

1. Fuels management vegetation treatments on approximately 1,710 acres using mechanized equipment, hand treatments, mastication, broad cast burning, chipping, pile burning or a combination of these methods.
2. Fuels management and wildlife habitat vegetation treatments on approximately 94 acres using hand treatments, chipping, prescribed broadcast burning, mastication, pile burning or a combination of these methods.
3. Fuels management and scenic integrity vegetation treatments on approximately 656 acres within 250 feet of the CDNST using mechanized equipment, hand treatments, pile burning or a combination of these methods. Treatments would occur along portions of the trail and not along the entire length.
4. Upgrading road infrastructure at an existing stream crossing in Soda Creek where fish passage is currently impeded, removal of a non-functioning culvert in Soda Creek and the removal of fill material in and near Soda Creek.
5. Modification to the bed and banks of Soda Creek, including excavation and fill, downstream from FSR 361.1 where the stream has down-cut in response to past management actions.
6. Modification (lowering) of a cribbing bridge structure on the Middle Fork of the Swan River.
7. Reroutes of the following trails: Soda Creek Trail #9014, Red Trail #9018, Hay Trail #9128, Blair Witch Trail #9129, Champion Trail #9021, Horseshoe Gulch Trail #9131 Colorado Trail #1776, and Soda Mine Trail #9126.



8. Realignment of FSR 94.1, including the decommissioning of the old roadbed.

Elements of this project affect the following CPW-identified High Priority Habitats, which are habitats for which CPW has sound spatial data and scientifically-backed recommendations:

- Elk & mule deer migration patterns & corridors.
- Elk production areas: That part of the overall range of elk occupied by the females for calving. Only known areas are mapped; this does not include all production areas for the herd.
- Elk winter range: That part of the overall range of a species where 90 percent of the individuals are located during the average five winters out of ten from the first heavy snowfall to spring green-up, or during a site specific period of winter as defined for each herd.
- Elk winter concentration areas: That part of the winter range of a species where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average five winters out of ten.
- Elk severe winter range: That part of the range of a species where 90 percent of the individuals are located when the annual snow pack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten.

CPW generally agrees with the stated wildlife habitat goals. However, elk and mule deer will need islands of timber in the vicinity of the Soda Creek area, and near trails, to use as cover from heavy recreation disturbance. Clear-cutting this area could lead to serious elk and mule deer displacement. The hand crew timber harvest polygons to the south/southeast of Soda Creek may better meet the intended purpose of the habitat work if shifted to the eastern aspect of Swan Mountain, into steeper terrain that cannot be mechanically harvested and hosts dense areas of downed trees.

CPW recommends ongoing collaboration with the USFS regarding the following timing limitations for the project. We generally support the reduction of fuels on the forest and seek to approach these actions in a cooperative manner that accomplishes these tasks while minimizing disturbance to wildlife.

- Elk winter range closure: December 1 - April 30
- Elk production closure: May 15 - June 30

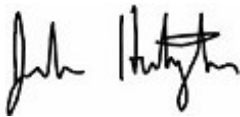
CPW requests that the USFS work with our field staff to time operations in a manner that is least impactful to big game. With strategic scheduling, many of the polygons identified as work areas could be completed outside of winter closures and during elk production. Work areas that intersect with elk production could be completed in the latter stages of the project (July 1 - November 30). CPW will provide elk production maps to USFS staff.

Outside of High Priority Habitats, this project area is mapped as snowshoe hare overall range and lynx potential habitat, lynx predictive summer habitat, and lynx predictive winter habitat. Portions of the project area are mapped as boreal toad habitat. To reduce potential contamination, any equipment brought onto the project in boreal toad habitat or wetlands should be sterilized according to Aquatic Nuisance Species (ANS) disinfectant protocols. Any materials coming into contact with boreal toad habitat or wetlands should be sterilized prior to site access (such as waders, boots, and hand tools). Any materials that come into contact with other watersheds during the project timeframe should be sterilized prior to reuse within the project boundaries. These measures will help reduce the potential for transmission of diseases known to affect boreal toads such as Chytridiomycosis. CPW will provide a map of boreal toad habitat and recommended ANS protocols to USFS staff.

CPW currently does not have concerns with the fisheries work proposed but would appreciate opportunity to have continued conversations with USFS staff as is pertains to fisheries and fish passage. CPW has no concerns with the re-routed trails aside from timing limitations for construction and reclamation of old routes. It is critical that reclamation of old routes occur prior to the opening of any new mileage to reduce disturbance of wildlife across the landscape. CPW staff is available to review seed mixes identified for reclamation, if helpful.

Colorado Parks and Wildlife appreciates the opportunity to review this Environmental Assessment and offer our recommendations. If there are any questions or need for additional information, please do not hesitate to contact District Wildlife Manager Jake Kay at (970) 485-3081, Land Use Specialist Danielle Neumann at (970) 366-1223, or Aquatic Biologist Jon Ewert (970) 509-9150.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeromy Huntington". The signature is fluid and cursive, with the first name "Jeromy" and last name "Huntington" clearly distinguishable.

Jeromy Huntington, Area Wildlife Manager

Cc. Travis Black, NW Regional Manager
 Jake Kay, District Wildlife Manager
 Tom Davies, District Wildlife Manager
 Elissa Slezak, Area Terrestrial Biologist
 Jon Ewert, Area Aquatic Biologist