



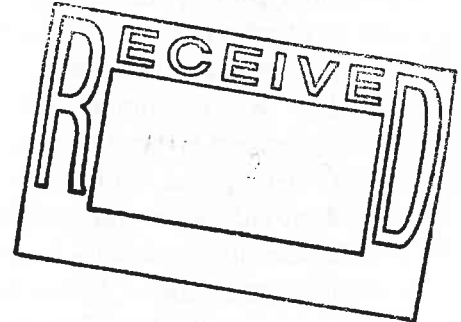
# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Ecological Services  
764 Horizon Drive, Building B  
Grand Junction, Colorado 81506-3946

IN REPLY REFER TO:

ES/CO:Colorado/City of Gunnison  
TAILS 65413-2007-I-0099

February 27, 2007



City of Gunnison  
Attn: Steve Westbay  
P.O. Box 239  
Gunnison, Colorado 81230

Dear Mr. Westbay:

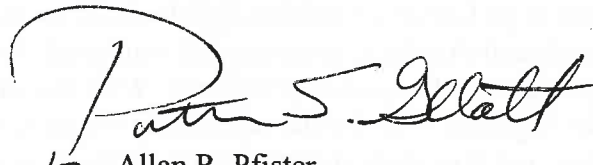
The U.S. Fish and Wildlife Service would like to provide comments on the December 19, 2006, Land Use Master Plan for the proposed Gunnison Rising development which the City of Gunnison is proposing to annex into city limits. The project is proposed to be built in portions of T. 49 N., R. 1 E., sections 4, 5, and 6; T. 49 N., R. 1 W., section 1; T. 50 N., R. 1 E., sections 30 and 31; and T. 50 N., R. 1 W., section 36 in Gunnison County, Colorado. The proposed project is immediately east of the current Gunnison city limits and comprises 1,661 acres north (851 acres) and south (810 acres) of Highway 50.

The project as proposed will likely have some impact on the Gunnison sage-grouse (*Centrocercus minimus*) as well as impacts to riparian habitat along Tomichi Creek. Although the grouse is no longer a candidate species there is a lawsuit over our April 2006 determination, where we found that the grouse was not warranted for listing under the Endangered Species Act, so the grouse is still a species of interest. With the large number of people expected to be living in the development area, habitat utilized by the grouse within the project area will become unsuitable, and it is likely that recreating residents will have an impact on the Signal Peak lek, a mile to the northeast of the project, which resides on BLM land. Additionally, due to the proximity of the lek to the project area, it is likely that some grouse use the project area at least seasonally. Unfortunately, the 34 acres of open space will not be enough to limit impacts to the grouse. We recommend that in-kind mitigation at an appropriate ratio take place for the habitat loss. We recommend mitigation be in the form of purchase of a piece of property with sage-grouse habitat or financial help putting property in a conservation easement. Also, to minimize recreational impact on BLM land near the Signal Peak lek we recommend that development north of the contour trail not exceed 1 house per 10 acres and between the contour trail and the cemetery ditch development does not exceed 1 house per 5 acres. Clustering development as far south as possible to achieve these densities could also occur. Although sage-grouse habitat on the south side of Tomichi Creek may be enhanced by acquisition of the land in parcel 13 by the Bureau of Reclamation we do not believe that it's appropriate to use this area as mitigation for "north area" sage-grouse impacts as the purpose of the Bureau of Reclamation acquisition is for aquatic and riparian habitat mitigation for impacts from Blue Mesa Reservoir.

We also have concern with the large number of people that will at least seasonally reside on the south side of the highway in both parcels 4 and 5. Parcel 5 is slated as a recreational resort with up to 400 seasonal units (RV's and cabins) and parcel 4 is slated for 388 year-round single family homes. With all the proposed people in the area it is likely that the riparian zone on the north side of Tomichi Creek and possibly the south side will be heavily impacted from fishermen, hikers, etc, during the summer. This will impact migratory birds that use the area as well as other wildlife and may negate any sage-grouse brood rearing benefits of the proposed Bureau of Reclamation land. The Service recommends that the number of homes and RV lots be curtailed. We recommend that no more than 20 cabins and no more than another 40 RV sites be built in parcel 5 to limit the number of people on the creek and provide people with a more solitary fishing and wildlife viewing opportunity. The proposed building boundary in parcel 4 should provide some buffer against people going along the creek but it is still not too far for people residing in parcel 4 to walk to Tomichi Creek. Consequently, we recommend that parcel 4 not have more than 1 house per 5 acres in the nearest row or two of lots adjacent to Tomichi Creek and no more than 2 houses per acre on lots nearest Highway 50 to reduce the number of people recreating on the creek. Furthermore, a hiking trail should not be placed in riparian habitat but should be on higher ground at least 50 feet away from riparian habitat. Occasional spurs (every ¼-1/2 mile or so) from the trail could go to Tomichi Creek for public access in areas least damaging to riparian habitat. Again, this would provide a more solitary experience and preserve riparian habitat for wildlife and viewers.

If the Service can be of further assistance, please contact Terry Ireland at the letterhead address or (970) 243-2778, extension 16. We encourage the City of Gunnison to become more active in the Gunnison Basin efforts to conserve the Gunnison sage-grouse. We would also appreciate receiving information on similar developments happening within the city limits.

Sincerely,



for Allan R. Pfister  
Western Colorado Supervisor

Pc: CDOW, Gunnison (J. Wenum)  
BLM, Gunnison (Kenny McDaniel)

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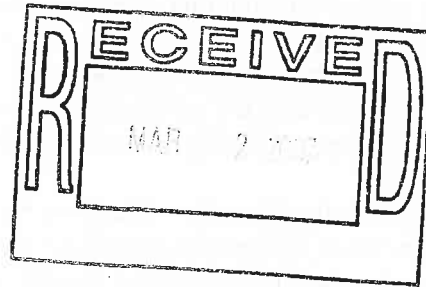
STATE OF COLORADO

Bill Ritter, Jr., Governor  
DEPARTMENT OF NATURAL RESOURCES  
**DIVISION OF WILDLIFE**  
AN EQUAL OPPORTUNITY EMPLOYER



*For Wildlife-  
For People*

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City of Gunnison  
Attn-Steve Westbay  
PO Box 239  
Gunnison, CO 81230

February 27, 2007

Re: Gunnison Rising Annexation

Dear Mr. Westbay:

The Colorado Division of Wildlife is grateful to have the opportunity to comment on the Gunnison Rising Annexation at such an early point in the process. The earlier our participation, the greater our ability is to assist the proponent in planning in a manner that best benefits wildlife as well as the developer's interests.

The Gunnison Basin consists largely of public land. Much of the remaining private land, most valuable from both a wildlife and development perspective, is composed of large tracts of ranch land. The recent history of development in the basin has been the popular small acreage ranchette type subdivisions, broken off of larger agricultural parcels. This type of expansion scatters development throughout the basin, fragmenting large tracts of habitat with a shotgun like pattern. The result is the loss of suitable wildlife habitat much greater than the foot print of the developed area itself. Naturally, this style of growth causes a significant negative impact to wildlife habitat, and therefore is the least desirable approach. An alternative method is to develop outward from the core population hubs in the valley, progressively building away from the center. This type of development pattern manifests the least negative impacts on wildlife, as habitat is lost gradually, hopefully giving wildlife species time to adapt to the changes and adjust their movements and patterns accordingly.

The "mantra" for wildlife professionals concerning development is "*avoid, minimize, mitigate*". The first order of protection for wildlife habitat is to avoid conflicts. A wildlife habitat evaluation will help to identify potential conflicts, and adjustments in the development plan can attempt to circumvent these conflicts altogether. The best way to accomplish this would be to preserve the land as a wildlife conservation area. Unfortunately, this is seldom a practical approach. It is possible though, through careful planning, to recognize and avoid the most serious conflicts, and focus development in areas which have the least value for wildlife. The second technique is to minimize the impacts of the development. This can be accomplished in several ways: clustered housing, appropriately designed infrastructure, and dedicated open space within the affected area are examples familiar to most developers. Mitigation, though generally a less preferable alternative, can often benefit wildlife if done in an appropriate manner, though it will most likely not replace lost habitat of an equal quality.

The parcel is identified by the Gunnison County Planning Commission as "critical habitat", based upon its mule deer winter range values (DOW WRIS mapping, 2003). It is important to understand that the WRIS maps

DEPARTMENT OF NATURAL RESOURCES, Harris D. Sherman, Executive Director  
WILDLIFE COMMISSION, Jeffrey Crawford, Chair • Tom Burke, Vice Chair • Claire O'Neal, Secretary  
Members, Robert Bray • Brad Coors • Rick Enstrom • Richard Ray • James McAnally • Ken Torres  
Ex Officio Members, Harris Sherman and John Stulp

are based on large scale vegetative analysis. The surface area indicated on the map as "severe winter, or production area" habitat does not reflect either an actual nor potential value for that purpose. Aside from the appropriate vegetation communities, many other habitat components are required to provide wildlife species suitable living space. During winter months, deer utilize southern facing slopes and valleys for feeding and loafing. The southern exposure of Signal Peak, just to the north and east of the proposed annexation, is one such example of suitable deer winter range. Although the annexation is within mapped mule deer winter range, and is labeled as critical habitat, the suitability of this parcel of land for wintering deer is less than optimal. Its value as "winter range" has been degraded by its proximity to urban areas and year-round recreational use. Conflicts with deer are still likely to arise however, especially if future property owners landscape with non-native flowers, shrubs, and trees, which may actually draw nearby wintering deer onto the annexed land. The real threat from development will occur from uncontrolled dogs harassing, chasing, or killing wintering wildlife.

The proposed annexation also lies within Gunnison Sage Grouse severe winter and brood rearing habitats. Again, the existing developments of Western State College, Tomichi Heights, Highway 50, and recreational uses on adjacent BLM land have already diminished the suitability of this parcel for sage grouse activities. That is not to say that this parcel is without any value for the grouse. That portion of the annexation on the north side of Highway 50 still maintains some useful and necessary habitat; the "wet meadow interface" is of prime concern for the rearing of chicks, and the north east corner of this parcel reaches very near a Gunnison sage grouse lek. The area north of the irrigation ditch which runs east/west along the north edge of the hay meadow is capable of supporting grouse nesting and brood rearing. Development in this area would likely impact grouse but to what degree is unknown. Off-site mitigation could be utilized if development is to occur north of the ditch. Trail development from the annexation onto adjacent BLM lands should be carefully coordinated with appropriate entities to minimize impacts.

Of greater concern is that part of the annexation to the south side of Highway 50. South of Tomichi Creek lies some of the most valuable sage grouse habitat in the basin. The Gunnison Rising Master Plan gives no indication of development south of Tomichi Creek; however it is critical to insure that the integrity of this most important habitat be preserved. The Division would recommend that any trail development that would occur should be done along the north side of Tomichi Creek to minimize impacts to habitat south of the creek.

General comments regarding the entire development include the recommendations of buried utility lines to minimize raptor perches near sage grouse habitat, covenants or other local controls regarding pets, and coordination of other amenities with the project (trails, open space) to increase their benefit to wildlife habitat through proper placement. Plans for humane treatment of species on the project site should be developed as the project progresses (relocation or euthanasia of Gunnison's prairie dogs).

As the Gunnison Basin continues to develop, habitat available for use by wildlife is incrementally lost and conflicts with wildlife will increase. Although this project in itself affects only a fragment of available winter range habitat, the effects of all development is cumulative, and should be considered so. As such, the Division of Wildlife encourages a development pattern that maintains the usefulness of the greater portions of the Gunnison Basin for wildlife. Thank you for the opportunity to comment on this land use change.

Sincerely,



J Wenum

Area Wildlife Manager - Gunnison

cc: John Bredehoff, Field Ops. Administrator  
Tom Spezze, SW Regional Manager  
Chris Parmeter, District Wildlife Manager  
Matt Thorpe, District Wildlife Manager