



COLORADO

Parks and Wildlife

Department of Natural Resources

Durango Office - Area 15
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Durango, CO 81301
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USFS-Dolores Ranger District
Attn: Tom Rice
29211 Highway 184
Dolores, CO 81323

October 4, 2019

RE: Scoping comments for the Proposed Rico Trails Project.

Dear Mr. Rice

Colorado Parks and Wildlife (CPW) has reviewed the Proposed Rico Trails Project scoping materials provided by the Dolores Ranger District for the Rico Trails Project. CPW appreciates the opportunity to comment and recognizes that there has been a significant effort by Forest Service staff to consider previous input from CPW on other proposals.

CPW is the state agency charged with managing Colorado's wildlife resources for the use and enjoyment of the state's citizens and visitors. The Rico area provides valuable habitats for many species of wildlife. Specifically, the project area is mapped as elk production and summer concentration areas. Trail planning and evaluation should include a discussion on the of the impacts of increased recreation on elk populations and these habitat types.

The 2013 San Juan National Forest Land Management Plan (SJLMP) acknowledges the importance of wildlife and habitats that the forest provides. Protection of key wildlife habitats like big game production areas and critical wintering areas are specifically mentioned for heightened protections in Section 2.3 of the SJLMP. Section 2.3, Desired Condition 2.3.2 outlines the desired to meet the state's population objectives for big game by maintaining habitat effectiveness and controlling human disturbance in key habitats. Guidelines 2.3.62 and 2.3.63 support this desire condition to conduct anthropogenic activities in these important habitats in a manner that does not reduce habitat effectiveness and maintains habitat connectivity. Please evaluate the proposed action and the potential to impact elk habitat use and connectivity and how the proposed actions will implement the LMP Guidelines.

Colorado's State Wildlife Action Plan (SWAP) identifies species of greatest conservation need and is intended foster greater coordination between the conservation actions of CPW and other members of Colorado's wildlife conservation community including the USFS. Several SWAP Tier 1 species including: golden brown-capped rosey-finch, golden eagle, southern white-tailed ptarmigan, and lynx and Tier 2 species: peregrine falcon, bald eagle, band-tailed pigeon, river otter are located in the proposed project area. Please evaluate the proposed action developments to these species and their habitats.



ROUTE DENSITY

The SJLMP provides specific guidance for maintaining habitat effectiveness in key wildlife habitats. Section 2.13.29 outline road and trail density guidelines for ungulate production areas, winter concentration areas, severe winter range, and critical winter range.

The recent US Department of the Interior (DOI) Secretarial Order 3376 allows electric motorized bikes (e-bikes) on non-motorized trails on DOI Federal lands, and may have future consequences if a similar policy were to be adopted by the Forest Service. CPW recommends that an analysis include the effects by allowing e-bikes on non-motorized trail systems to wildlife. The analysis should discuss the impacts on important wildlife habitats and the effects of increased frequency and ride duration on habitat effectiveness for wildlife. These routes should also be included in the route density analysis per SJLMP 2.13.29 to help to determine the extent of the residual impacts that need to be mitigated.

SEASONAL TIMING

CPW requests a seasonal restriction on single track motorized and non-motorized routes per the LMP 2.3.59 of May 15-June 30 in areas mapped as elk production areas. These restrictions would help to increase security for ungulates in the production areas by avoiding the bulk of the calving time period.

ENFORCEMENT OF TRAVEL MANAGEMENT RULE

CPW is concerned with enforcement of travel management rules. As noted in previous comments, enforcement is a key component to achieving the goal of many travel management plans. User created routes have degraded habitat in some forest areas. Please evaluate the capacity to maintain and enforce travel management designations on the District.

SPECIFIC ROUTE COMMENTS BY AREA

Spring Creek-

It is unclear the purpose of this specific proposal. There is currently a motorized single track trail that allows access and connection between Taylor Mesa and Stoner Mesa via FS Trail 629. The Rico West Dolores Travel Management Record of Decision (2018) designated the Spring Creek trail as non-motorized. The proposal realigns the trail less than half mile and re-classifies the trail as motorized. The details of the purpose of change are not articulated in the scoping notice. If resource degradation and protection in the bottom of Spring Creek Drainage is driving the Purpose and Need for the re-route, then evaluate why a change to motorized is necessary component for the re-route. Additionally please evaluate the purpose and need including the use, utility, user experience of the existing alignment as a non-motorized trail segment and how the reroute as a non-motorized trail will affect the public and wildlife.

Circle Trail-

The proposed trail is in summer concentration area and adjacent to mapped production areas. CPW would like the Forest Service to evaluate the Purpose and Need for additional access to the Colorado Trail. Currently, there are three existing trails within 5 miles of Rico

that connect to the Colorado Trail. Also evaluate the addition of promoting this trail segment as a system trail to the public and how that could increase the frequency of and use by hikers, bikers, and e-bikers and the associated cumulative impacts to wildlife and sensitive habitats.

Rio Grande Southern Trail-

The information provided it is unclear if the trail would be open to motorized or non-motorized use. CPW would like to see the designation on the proposed trail to evaluate its impact.

Lower Ryman Trail -

CPW supports the effort to reroute for a more sustainable route.

Thank you for considering our input on your trail proposals. It is our intent to assist the Forest Service in trail system that accommodates multiple use of the forest while still providing areas for connected, high quality habitat that important for a variety of wildlife species. If you have any questions, or would like to schedule a time to discuss our recommendations, please contact District Wildlife Manager, Andy Brown at 970-799-1628.

Sincerely,

Brian Magee
for

Matt Thorpe
Area Wildlife Manager- Durango

cc: Cory Chick (SW Regional Manager); Jon Holst (SW Region Energy Liaison); Brian Magee (SW Land Use Coordinator); Brad Weinmeister (Area 15 Terrestrial Biologist); Area 15 File

