



COLORADO

Parks and Wildlife

Department of Natural Resources

Durango Office - Area 15
151 East 16th Street
Durango, CO 81301
P 970.247.0855 | F 970.382.6672

October 4, 2019

San Juan National Forest – Dolores Ranger District
Attn: Tom Rice
29211 Highway 184
Dolores, CO 81323

RE: Sage Hen Motorized Trail Proposal – Scoping Notice

Dear Tom,

Colorado Parks and Wildlife (CPW) has reviewed the September 2019 Sage Hen Motorized Trail Proposal Scoping Notice provided by the Dolores Ranger District of the San Juan National Forest. The proposal includes 4.75 miles of new OHV (62" and narrower) motorized trail within the Sage Hen/McPhee area, which would connect Montezuma County Road X and Forest Service Road 504. We understand that the proposed project will take place on lands administered by both the San Juan National Forest (SJNF) and the Bureau of Reclamation (BOR).

According to the scoping materials, the project analysis may include an evaluation of implementing a motorized season of use time period between Memorial Day to Labor Day, and the construction of physical barriers to limit motorized travel off of the proposed trail. We also understand that the SJNF may consider evaluating the implementation of a seasonal public access closure from December 1st to April 30th for big game habitat management.

The majority of the land in and around the proposed project area consists primarily of historic agricultural fields, pinon, juniper, sagebrush, oak brush, and grassland communities. Wildlife species found in this area include mule deer, elk, mountain lion, black bear, neo-tropical birds, various raptors, and small mammals. CPW attended several on-site reviews held in May and August of 2019, respectively, with the SJNF and Montezuma County Recreation Advisory Committee.

Purpose and Need

The Purpose and Need described in the scoping materials for the proposed route is unclear. There are hundreds of miles of existing motorized recreational access and opportunity in SJNF within and adjacent to Montezuma County. Access to the SJNF is plentiful and well distributed across the forest. Additionally, there are several existing routes that provide motorized route connections between the San Juan National Forest and the Rim Rocker Trail that satisfies the purpose and need for public access as stated in the scoping materials. Please include an evaluation of the existing opportunities to access and enjoy the SJNF. Additionally, please include an evaluation of



Alternatives to the proposed action that satisfy the Purpose and Need for public motorized access to connect to the Rim Rocker Trail.

Administrative motorized access to the McPhee Dam by BOR, Dolores Water Conservancy, and Western Area Power Administration is part of the Dolores Project Operations. Access is already provided to the Dam via FS Road 504. It is unclear why there is a need for administrative access through Sage Hen after nearly 30 years of Dam operations. Please include an evaluation of the need for additional administrative access through Sage Hen. Also, please include an Alternative that includes administrative access only.

Dolores Project Environmental Commitments

The Dolores Project and the construction of McPhee Dam resulted in numerous impacts to wildlife and wildlife recreation as described in the Final Environmental Statement to the Dolores Project completed in 1977 (FESDP 1977). As a result of these unavoidable Project impacts, BOR prepared the Dolores Project Definite Plan Report (DPR 1977). To mitigate the loss of wildlife habitat from the inundation of McPhee Reservoir, BOR purchased the Sage Hen property and transferred it to the SJNF explicitly for purposes of maintaining and improving wildlife habitat. This area was identified as the McPhee Wildlife Management Area whose purpose was to be “acquired, improved and operated for wildlife” (DPR 1977 pg. 42.). The mitigation commitments included in the DPR exist for the duration of the Dolores Project impacts. Please include an evaluation of the compatibility of the proposed action with the wildlife management purposes for which Sage Hen was acquired.

Big Game

CPW has documented year round use of the proposal area by mule deer and elk. The area also sees extremely high mule deer and elk densities during winter months due to an influx of migratory animals. The Sage Hen area is the only public land west of the Dolores River that has a potential carrying capacity large enough to winter large numbers of animals. This fact alone makes it one of the most important and high priority publicly-managed properties west of the Dolores River for mule deer and elk herd health and population size.

CPW is encouraged to see the proposal of closing the Sage Hen area to public access from December 1st to April 30th during the winter months. In our 2017 comments on the Boggy Draw Expansion Environmental Assessment, we recommended that the USFS implement a seasonal closure on Sage Hen to maintain big game habitat use as other portion of the forest were developed for recreation. Increase development and recreation around Dolores make Sage Hen more critical for wintering big game animals, and existing commitments to minimize disturbance and increase the carrying capacity on this property for big game are contained in both the SJNF Land Management Plan (LMP 2013) and the Dolores Project documents.

There is a large body of evidence documenting displacement of big game from roads and trails (including non motorized trails) and a decline in habitat effectiveness for big game as road and trail densities increase (Wisdom et al. 2018, Preisler et al. 2013, Sawyer et al., 2013, WAFWA 2013, Rogala et al. 2011, Wilber et al. 2008, Rowland et al. 2005, Rowland et al. 2000, Phillips and Alldredge 2000). To maintain habitat effectiveness, CPW recommends maintaining road and trail densities at 1 mile/square mile or less in production areas, migration corridors, winter ranges

for big game. Please include an evaluation of route density and a discussion on how to maintain and improve the project area's habitat effectiveness for big game.

Lone Dome State Wildlife Area

BOR's obligations under the FESDP, DPR, and the Final Supplement to the Final Environmental Supplement for the Dolores Project (FSFES 1989) include mitigating the loss of wildlife habitat. BOR purchased the private lands along the river below McPhee Dam site and transferred those parcels to CPW (the Division of Wildlife) and the SJNF to be managed specifically for wildlife and wildlife recreational purposes. The properties below the McPhee Dam, including the 75 acres of wetland mitigation, are currently managed for wildlife and wildlife related recreation in accordance with BOR's 1989 commitments. CPW is concerned with how the proposed OHV route and dramatically increased OHV traffic below McPhee Dam will impact the character and values of CPW's mitigation property. Please evaluate increased traffic, visitation, and use of the canyon below McPhee to Bradfield Bridge, and how those increases would affect wildlife and wildlife recreational users. In addition, please evaluate the impacts of increased traffic and visitation on the maintenance of user facilities within the canyon.

Travel Management

CPW is becoming increasingly aware of the popularity and trend of e-bikes. Please evaluate the effects of e-bikes on National Forest system routes including 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.

With increasing amount of motorized and non-motorized trails based out of the Dolores Ranger District, CPW recommends that the SJNF, Montezuma County Recreation Advisory Committee and CPW collaborate to create a strategy for how a static number of law enforcement officers will handle the increase in trail miles and trail use in the area. The creation of this strategy will deter the formation of illegally created trails within the Sage Hen area preserving critical unfragmented wildlife habitat.

Raptors

There is an established body of evidence that human activities and habitat alteration in close proximity to raptor nest sites may adversely impact nest success (Oxley et al. 1974, Scott 1985, Knight and Skagen 1988, Homes et al. 1993, Schomburg 2003, Fuller 2010). Many raptor species return to the same nest locations annually, making their annual breeding success sensitive to direct and inadvertent human disturbance and habitat alteration at existing nest sites (Megown et al. 2007). Protecting existing raptor nest sites and the reproductive activities at those sites is critical for managing long-term raptor population trends in Colorado. Please include in the environmental assessment a discussion on how active raptor nests will be conserved within the analysis area.

Aquatic Species

The project area encompasses several smaller drainages that do not directly support fish, but that drain into the Dolores River and McPhee Reservoir which are destination trout fisheries and supports several native fish species. Trout species in the area primarily consist of brown trout and rainbow trout, while native fish species of concern include the Bluehead Sucker, Flannelmouth Sucker, and Roundtail Chub. CPW's primary concern regarding aquatic species is to maintain

water quality by limiting erosion and sedimentation into streams. Water quality can be maintained by minimizing drainage crossings and surface disturbing construction activities near these resources. Please incorporate design features to protect fisheries and water quality from the proposed project.

Species of Greatest Conservation Need

In addition to the raptors and aquatic species identified above, there are several species of greatest conservation need that could be negatively impacted by the proposal. CPW's State Wildlife Action Plan ([Colorado SWAP](#)) Tier 1 species located in Sage Hen include Columbia sharp-tailed grouse, and tier 2 species include band-tailed pigeon and river otter. Please include an analysis and discussion on how the proposed action may impact these Colorado SWAP species.

Thank you for the opportunity to comment on this proposed project. If you have any questions concerning these comments, please feel free to contact Land Use Coordinator, Brian Magee at (970) 375-6707.

Sincerely,

Brian Magee
for

Matt Thorpe
Durango Area Wildlife Manager

cc: Tyler Kersey, District Wildlife Manager ; Cory Chick (SW Regional Manager); John Holst (SW Region Energy Liaison); Brian Magee (SW Land Use Coordinator); Brad Weinmeister (Area 15 Terrestrial Biologist); Area 15 File

References

Definite Plan Report Dolores Project Colorado. April 1977. United States Department of Interior Bureau of Reclamation

Final Environmental Statement to the Dolores Project. 1977. United States Department of Interior Bureau of Reclamation.

Final Supplement to the Final Environmental Statement for the Dolores Project. 1989. United States Department of Interior Bureau of Reclamation.

Fuller, M. R. 2010. Raptor nesting near oil and gas development: an overview of key findings and implications for management based on four reports by Hawk Watch International. U.S. Dep. Inter. Bur. Land Manage. Tech. Note 432. Denver, CO. 11pp.

Holmes, T. L.; Knight, R. L.; Stegall, L., and G. R. Craig. 1993. Responses of Wintering Grassland Raptors to Human Disturbance. Wild. Soc. Bull 21:461-468.

Knight, R. L., and S. K. Skagen. 1988. Effects of Recreational Disturbance on Birds of Prey: A Review. Pages 355-359 *in* R. L. Glinski, B. G. Pendleton, M. B. Moss, M. N. LeFranc, B. A.

Oxley, D. J., M. B. Fenton, and G. R. Carmody. 1974. The Effects of Roads on Populations of Small Mammals. *J. App. Ecology*. 11:51-59.

Phillips, G. E., and A. W. Alldredge. 2000. Success of Elk Following Disturbance by Humans during Calving Season. *The Journal of Wildlife Management*, Vol. 64, No. 2 (Apr., 2000), pp. 521-530.

Preisler, H. K., A. A. Ager, and M. J. Wisdom. 2013. Analyzing animal movement patterns using potential functions. *Ecosphere* 4(3):32. <http://dx.doi.org/10.1890/ES12-00286.1>

Rogala, J. K., M. Hebblewhite, J. Whittington, C. White, J. Coleshill, and M. Musiani. 2011. Human activity differentially redistributes large mammals in the Canadian Rockies national parks. *Ecology and Society* 16(3): 16. <http://dx.doi.org/10.5751/ES-04251-160316>

Rowland, M. M., M. Wisdom, B. Johnson, and M. Penninger. 2005. Effects of Roads on Elk: Implications for Management in Forested Ecosystems. Pages 42-52 *in* Wisdom, M. J., technical editor, *The Starkey Project: a synthesis of long-term studies of elk and mule deer*. Reprinted from the 2004 Transactions of the North American Wildlife and Natural Resources Conference, Alliance Communications Group, Lawrence, Kansas, USA.

Rowland, M. M., M. Wisdom, B. Johnson, and J. Kie. 2000. Elk Distribution and Modeling in Relation to Roads. *The Journal of Wildlife Management*, Vol. 64, No. 3 (Jul., 2000), pp. 672-684

Sawyer, H., M. Kauffman, A. Middleton, T. Morrison, R. Nielson, and T. Wyckoff. 2013. A framework for understanding semi-permeable barrier effects on migratory ungulates. *Journal of Applied Ecology* (2013) 50: 68–78

Schomburg, J. W. 2003. Development and Evaluation of Predictive Models for Managing Golden Eagle Electrocutions. M.S. Thesis. Montana State Univ. 98 pp.

Scott, T. A. 1985. Human Impacts on the Golden Eagle Population of San Diego County from 1928-1981. M.S. Thesis. San Diego State Univ. 101pp.

WAFWA. 2011. Lutz, D. W., J. Heffelfinger, S. Tessmann, R. Gamo, and S. Siegel. 2011. Energy Development Guidelines for Mule Deer. Mule Deer Working Group, Western Association of Fish and Wildlife Agencies, USA. 31pp.

Wilbert, M., Thomson, J., and N. Culver. 2008. Analysis of habitat fragmentation from oil and gas development and its impact on wildlife, The Wilderness Society ecology and economic research department, Washington, D.C. 31 pp.

Wisdom, M. J., H. Preisler, L. Naylor, R. Anthony, B. Johnson, and M. Rowland. 2018. Elk responses to trail-based recreation on public forests. *Forest Ecology and Management* (2018) 411: 223–233