



COLORADO

Parks and Wildlife

Department of Natural Resources

Durango Service Center  
151 E. 16<sup>th</sup> Street  
Durango, CO 81301  
P 970.247.0855

March 26, 2020

USFS - Dolores Ranger District  
Attn: Derek Padilla  
29211 Highway 184  
Dolores, CO 81323

RE: Draft Environmental Assessment comments for the Proposed Rico Trails Project

Dear Mr. Padilla,

Colorado Parks and Wildlife (CPW) has reviewed the Environmental Assessment (EA) for the Proposed Rico Trails Project provided by the Dolores Ranger District. CPW provide scoping comments October 4, 2019.

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. Consideration should include 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 desire 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.

CPW is currently updating the elk management plans for E24. CPW initiated four public meetings on elk management and elk Herd management Plan (HMP) revisions during February 2020 with participation from 400 individuals attending those meetings. In addition, CPW also conducted an online survey to understand elk management issues important to the public. There were 712 responses to the survey. The issues and concerns identified by participants include in part, low elk numbers, concerns about OHV and motorcycle use on public land, and concerns about the impacts of non-motorized recreation specifically hiking, mountain biking and backpacking, on elk.

When asked how the public would like to see the elk population managed over the next 10 years, 57% wanted it to increase greatly, 35% increase somewhat, 5% stay at the current



level, and 3% felt it should decrease. The majority of the public also indicated that they were willing to lose hunting opportunity to increase the elk herd.

#### ROUTE DENSITY

The SJLMP provides specific guidance for maintaining habitat effectiveness in key wildlife habitats. Section 2.13.29 outlines density guidelines for ungulate production areas, winter concentration area, severe winter range and critical winter range. We appreciate that the USFS is decommissioning additional non-motorized routes in the proposed action. However, in our review of the EA we did not see a route density analysis per SJLMP 2.13.29 that we raised in our scoping comments. The analysis should have discussed the impacts on important wildlife habitats and the effects of increased frequency and ride duration on habitat effectiveness for wildlife. Collectively, the motorized and non-motorized routes need to be evaluated together to help to determine the extent of the residual impacts that need to be mitigated.

#### SEASONAL TIMING

CPW requested 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. We would like to have further detailed discussions with the USFS on the rationale that seasonal timing limitations have no effect on maintaining habitat effectiveness for elk production.

It is our intent to assist the Forest Service in trail system management that accommodates multiple use of the forest while still providing areas of connected, high quality habitat that are important for a variety of wildlife species. Please contact District Wildlife Manager, Andy Brown at 970-799-1628 to schedule a time to discuss our outstanding concerns regarding the proposed project.

Sincerely,

Handwritten signature of Matt Thorpe, appearing as "M R Thorpe #997".

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