



COLORADO

Parks and Wildlife

Department of Natural Resources

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6/13/2024

United States Forest Service
Rio Grande National Forest
Forest Supervisor - Dennis Kuhnel
1055 9th St., Del Norte, CO 81132

RE: Rio Grande National Forest Over Snow Travel Management Project

Dear Mr. Dennis Huhnel,

Colorado Parks and Wildlife appreciates the opportunity to review and provide comments on the Rio Grande National Forest Over Snow Travel Management Project. Colorado Parks and Wildlife's (CPW) mission is to perpetuate the wildlife resources of Colorado, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations. This mission is implemented through our 2015 Strategic Plan¹ and the goals it embraces are designed to make CPW a national leader in wildlife management, conservation, and sustainable outdoor recreation for current and future generations. Part of this implementation includes responding to agency requests for recommendations to avoid, minimize, and mitigate the impacts of various types of land use and planning activities on the wildlife and recreational resources of Colorado.

Winter Recreation Opportunity Spectrum

The 2012 Planning Rule codified the requirement of Recreation Opportunity Spectrum (ROS) in planning processes and protocols were written. The Winter ROS completed for this project follows the National ROS Inventory Mapping Protocol, which determines designations primarily from current recreation needs, practices, and permitted activities. This protocol includes, within Step 11, the ability to identify conflicts with motorized settings and wildlife habitat management and flags these issues to be analyzed in subsequent planning phases such as Winter Travel Management Planning. CPW appreciates the efforts by the Forest Service to analyze impacts to wildlife habitats that may result from WROS designations and subsequent use.

¹ Colorado Parks and Wildlife 2015 Strategic Plan (November 2015)
<http://cpw.state.co.us/Documents/About/StrategicPlan/2015CPWStrategicPlan-11-19-15.pdf>



Big Game

Functional winter ranges and migratory corridors are known to be a limiting factor for big game populations in western Colorado and other high mountain areas of the western United States. Habitat loss, fragmentation, and development on private lands and the resultant regional human population increases is putting more pressure on public lands to support wintering wildlife. CPW appreciates that these important habitats are being considered in the planning effort and would recommend that the future analysis include maps of the proposed actions overlaid on sensitive wildlife habitats to allow for better understanding of impacts by all parties. CPW publishes maps of species activity, distribution, and use in Colorado. Those maps are reviewed and updated on a regional cycle statewide. CPW will be reviewing and making modifications to our wildlife maps within the Rio Grande National Forest (RGNF) in the summer of 2024. The existing maps for the RGNF were last modified in 2019. The final maps will be available in December of 2024 or January 2025 for the public. We recommend incorporating the ability to update the analysis, with the best available science, when those maps are published.

The Project Design Features table includes a timing limitation from December 1 to April 15 for travel on designated routes through big game winter ranges. CPW's recommendations for avoiding and minimizing impacts to species and their habitats utilize the best available science, and therefore are subject to change as new research is published. Therefore, CPW recommends that the Forest Service align timing limitations to our High Priority Habitat recommendations² and extending any seasonal timing limitations to April 30 for elk and mule deer severe winter ranges and winter concentration areas.

CPW supports the Semi Primitive Non-motorized designation assigned to the area south of Del Norte. This designation provides cross-boundary protection with the BLM lands to the north, which receive a seasonal timing closure from December 1 to April 30 for the protection of wintering big game.

Lynx

CPW reintroduced Canada lynx to Colorado 25 years ago. During the years of 1999-2006, 218 individuals were introduced and fitted with telemetry collars. The data collected from the effort was used to develop models for "actual" currently occupied range as well as predicted range for both winter and summer periods. The majority of the planning area falls within the lynx winter habitat predictive model. For CPW's Occupied Use Model within the Rio Grande NF, which was made using GPW data from the period of 1999-2010, a large portion of occupied areas is within designated Wilderness. However, occupied habitat occurs across many settings in the proposed ROS spectrum on the Rio Grande NF. CPW is currently working on an updated model using the latest data and statistical approaches that will be made publicly available in the near future.

² CPW Recommendations to Avoid and Minimize Impacts to Wildlife from Land Use Development in Colorado: https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/CPW_HPH-Map-Layers.pdf



Lynx are tolerant of both motorized and non-motorized recreation at low intensities (Olson et al. 2018³, Squires et al. 2018⁴). However, as recreation pressures intensity and increase, the data has shown lynx will alter their spatial use of their home range (Olson et al. 2018). CPW has developed the following Best Management Practices (BMPs) aimed at minimizing impacts of recreation to lynx populations. Since lynx tend to select areas of low recreation intensity when establishing their home ranges, the following BMPs are designed to protect un-fragmented or low density trail or recreation areas.

- Limit trail/route densities to less than one linear mile of trail per square mile on average within high-quality lynx habitat.
- Avoid trail/route placement and habitat fragmentation within identified lynx linkages to maintain landscape connectivity.
- To protect denning, implement seasonal trail closure of winter-based recreation trails (skiing, snowmobiling) on May 1 annually within high-quality lynx habitat.
- Discourage the introduction and expansion of snow compaction activities within high-quality lynx habitat. Locate winter trailheads, parking areas, access roads, and other facilities outside of high-quality lynx habitat.
- Discourage the introduction and expansion of off-trail motorized over-the-snow activities within high-quality lynx habitat.
- Plan trail and recreational development and manage recreational and operational uses to provide for lynx movement and to maintain effectiveness of high-quality lynx habitat.

CPW appreciates the Rio Grande NF analyzing impacts to Canada lynx associated with current and future winter recreation that will result from this planning effort.

Minimum Snow Depth

This proposal includes implementing a 12 inch minimum snow depth requirement regardless of underlying surface. CPW is concerned that this requirement may be too restrictive for travel over frozen reservoirs and other large bodies of frozen water and may disproportionately impact certain user groups (e.g. ice fisherman). Oftentimes, settling occurs in the snowpack and there is less than 12 inches of snow remaining on top of the ice but with sufficient snow cover on the ground adjacent to the reservoir. Please analyze if this restriction is needed for frozen bodies of water to reduce the potential of resource damage.

Trailhead Parking and Congestion

Colorado continues to see increased user days and recreation pressure associated with motorized and non-motorized winter sports. Participation in these activities is expected to rise by 12%-28% for

³ Olson, L. E., J. R. Squires, E. K. Roberts, J. S. Ivan, and M. Hebblewhite. 2018. Sharing the same slope: behavioral responses of a threatened mesocarnivore to motorized and non-motorized winter recreation. *Ecology and Evolution* 8:8555–8572.

⁴ Squires, J. R., K. S. Heinemeyer, and M. Hebblewhite. 2018. A study of shared winter habitats: tracking forest carnivores and backcountry recreationists. *Wildlife Professional* 12.1:45–49.




motorized and non-motorized respectively, from the years of 2020-2030⁵. Consequently, we expect there to be an increase in congestion and parking issues at popular winter trailheads. Please analyze the need to improve trailhead or parking areas to accommodate this need and alleviate existing and future congestion issues.

Conclusion

Colorado Parks and Wildlife appreciates the opportunity to provide input on the Rio Grande Over Snow Travel Management Project and the continued cooperation between the Rio Grande National Forest and CPW. If you have any questions regarding these comments or would like to discuss anything related to the project, please contact me at (719) 587-6904.

Sincerely,



Rick Basagoitia

Area Wildlife Manager
Area 17 - San Luis Valley

CC: SW Region file; Area 17 file

⁵ <https://cpw.state.co.us/Documents/Research/SocialScience/Trends-Report-July-2020-Final.pdf>

