

June 14, 2024

Forest Supervisor Dennis Kuhnel
Rio Grande National Forest 1055 9th Street
Del Norte CO 81132

Submission via <https://cara.fsc2.usda.gov/>



Re: Rio Grande National Forest Over-snow and Motorized Use Travel Plan

Dear Forest Supervisor Kuhnel:

Colorado Wildlife Federation (CWF) submits these brief scoping comments on the proposed action document. For this document our focus is on avoidance and minimization of impacts of Over Snow Vehicle (OSV) on big game crucial winter habitats.

The Forest Service must apply its minimization criteria in its travel management regulations when locating and managing OSV trails and usage. 36 C.F.R. §§ 212.55, 212.81(d). To direct these criteria to ensure big game habitat protections, we urge the agency to adhere to Colorado Parks and Wildlife's (CPW) high priority habitat recommendations to minimize disturbance in and avoid fragmentation to elk and deer severe winter range and winter concentration areas, and bighorn sheep winter range and production areas. See https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/CPW_HPH-Map-Layers.pdf. Colorado Parks and Wildlife's Recommendations to Avoid and Minimize Impacts to Wildlife from Land Use Development in Colorado that lists species and associated High Priority Habitats (updated July 19, 2023). We also note that conservation of wildlife habitats is addressed in the Memorandum of Understanding between Colorado and United States Department of Agriculture (updated 2024).

CPW recommends timing limitation for both elk and mule deer severe winter range with "no permitted or authorized human activities" from December 1 to April 30. Elk and mule deer severe winter range is defined by CPW as "that part of the winter range where 90% of the individual animals are located when the annual snowpack is at its maximum and/or temperatures are at a minimum in the two worst winters out of ten."

Its timing limitations recommended for both elk and deer winter concentration areas are for the same time period as severe winter range, December 1 to April 30. CPW defines an elk and mule deer winter concentration area as "that part of the winter range where densities are at least 200% greater than the surrounding winter range density during the same period used to define winter range in the average five winters out of ten." Colorado Parks and Wildlife GIS Species Activity Mapping Definitions. <https://cpw.state.co.us/learn/Maps/CPW-Public-GIS-Species-Activities-Definitions.pdf>. In addition, if OSV trail use will be followed by spring ATV use in the same area, careful

planning must be taken to ensure such trails are not sited where they will cross or otherwise disturb production areas. For elk production areas, CPW recommends closures of trails from May 15 to June 30.

For bighorn sheep winter range CPW recommends timing limitation from November 1 to April 30. As this species' production begins much earlier than for deer and elk, CPW recommends no permitted or authorized human activities in sheep production areas beginning February 1 through May 1. These are particularly sensitive seasonal habitats where development and/or disturbance can significantly alter the species' lifecycles or ability to access areas, including escape routes, that are key to herd health and stability.

In addition, big game migration corridors and pinch point areas mapped by CPW should be avoided. Migratory and movement corridors are not habitats that can be re-created elsewhere through mitigation. CPW's recommendations for big game migration corridors and pinch points are provided in the document referenced above.

The attached map shows big game high priority habitat layers and Rio Grande National Forest winter routes.

(<https://experience.arcgis.com/experience/2a4712852948424dab92ead1fdec8a60>).

In addition, Colorado's Guide to Planning Trails with Wildlife in Mind (Appendix A) incorporates CPW's high priority habitat recommendations with respect to recreational trail development in big game migration corridors and other big game habitats, including limiting trail densities to maintain habitat function and to conserve these habitats for big game use. This Guide also provides a partial literature review.

https://cpw.state.co.us/Documents/Trails/Planning_Trails_with_Wildlife_in_Mind_full_plan.pdf.

We appreciate the opportunity to provide comment at this stage of the process.

Sincerely,

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