



June 14, 2024

Judi Perez, Planner
Rio Grande National Forest
1055 9th Street, Del Norte, Colorado 81132
Or Electronic Comments can also be sent to this link:
<https://cara.fs2c.usda.gov/Public/CommentInput?project=65529>

Hello Ms. Perez and Winter Travel Planning team for the Rio Grande National Forest;

Thanks for the opportunity to submit scoping comments to the Rio Grande National Forest and support your commitment to deliver a Winter Travel Plan Environmental Impact Statement (EIS) document and Record of Decision that will serve to initiate a path forward which directs the use of winter recreation in a responsible manner. *This plan will serve as a guiding document for decades.*

It will also assist as a management tool that minimizes resource damage, reduces user conflicts; and supports behavior management strategies that can elevate a safe, meaningful experience for all members of the public, who enjoy recreating on the Rio Grande. Fundamentally, the plan is there to protect the complex ecosystems that make up the underpinnings of the Forest itself.

The San Luis Valley Ecosystem Council (SLVEC) is a local public lands advocacy organization based in Alamosa, CO. *Our mission to protect and restore the biological diversity, ecosystems, and natural resources in the Upper Rio Grande Basin, by balancing ecological values and sustainable human needs.* We are a nonprofit incorporated in 1998 by a group of citizens concerned about impacts to public lands, including unbridled recreation, around the San Luis Valley. We believe in the power of education, stewardship, community involvement, and public advocacy. We have about 400 members and a mailing/social media list of about 2,000 citizens who support public lands, and their natural resource protection for future generations.

The Regulatory process and wildlife

First and foremost, under the Winter Travel Management Regulations, all areas are intended to be closed to Over the Snow Vehicles (OSV), unless they are designated otherwise. As is currently status quo on the Rio Grande, motorized recreation groups can go just about anywhere that isn't designated Wilderness or Special Interest Areas (SIAs); and according to the Recreation Opportunity Spectrum (ROS) maps, presented at recent public meetings, that encompasses about 74% of the Forest, which is now open to motorized use.

The ability to travel cross country—further and faster, because of technological advances, combined with the increase of OSV user occurrences, means that implementing current ecological/wildlife mapping is essential, to make critical decisions. Baseline mapping of sensitive areas that become more important for wildlife in winter conditions is required to inform OSV closure moving forward.

Winter recreation, especially snowmobiles and tracked OHVs, can have a significant impact on wintering wildlife; thus all motorized winter range recreation should be avoided in areas that have been identified below.

Recommendations

SLVEC encourages the Forest Service to work closely with Colorado, Parks and Wildlife (CPW) to include specific recommendations for avoiding and minimizing impacts to wildlife, including but not limited to big game winter activity areas, winter wildlife areas and riparian/wetland areas; that may not appear to be sensitive, unless analysis is done to determine habitat conditions beneath the snow. (see CPW attached Map document, "Potential Severity of Recreational Impacts to Wildlife percentiles.")

It is also important to note that CPW updates these maps each year with the winter habitats in the RGNF updated typically every four years based on their regional update schedule, with aquatic habitat possibly updated more often.

Big Game Winter Range

Mapping Big Game winter range and reviewing scientific research is useful to include in the baseline modeling. Severe winter range occurs less often and is primarily utilized 1 to 2 times per decade during the most severe winters.

Therefore, overall winter range is used most by big Game species. Elk and bighorn sheep tend to be the highest impact species, so understanding where they are wintering and avoiding (closing) those areas is important.

Canada Lynx Habitat

The Winter Recreation Planning Area has considerable overlap with occupied lynx habitat on the Rio Grande National Forest. This is a federally threatened species that is active during winter and may be influenced by activities associated with the winter motorized and non-motorized recreational activities.

As you know, the RGNF contains some of the most important core habitat for Canada lynx in the state of Colorado including key denning areas and linkage areas that provide movement to and from the core habitat to adjacent forests and beyond.

An analysis within the EIS of potential effects is essential to the winter recreation planning proposal to establish accurate baseline conditions and effects of various alternatives. Section 7 consultation with the U.S. Fish and Wildlife Service will be required to assess the direct, indirect, and cumulative effects of the project activity proposal (s).

In November 2021, SLVEC had a discussion with a Rio Grande Forest Service "Technician" and the following information was shared:

1. Winter Recreation is becoming a huge liability
2. There are now miles and acres of snow compaction, when was that last analysis done?
3. Technology is taking snow mobiles off the trails, change is already occurring and it is crazy, and social platforms are increasing its use.
4. The US Fish and Wildlife Service (USFWS) do not understand what is happening on the landscape or is tracking what is happening.
5. Snow mobiles are covering all kinds of ground, **northern aspect of the mountain-scapes are Lynx reclusive spots**, but now snow mobiles can access these areas as well.
6. The Lynx conservation plan, scientifically needs to be revisited.

Compliance with the Southern Rockies Lynx Amendment (SRLA)

Given that the winter recreation planning directly overlaps mapped and occupied lynx habitat, the following SRLA objectives will apply to the project. The Forest Service NEPA associated with the planning activities must demonstrate how the project is consistent with the objectives. Any mitigations or design criteria suggested during the NEPA process will need to be incorporated into the overall operations.

Objective Human Uses 01 (HU 01):

Maintain the lynx's natural competitive advantage over other predators in deep snow, by discouraging the expansion of snow-compacting activities in lynx habitat.

Objective HU 02:

Manage recreational activities to maintain lynx habitat and connectivity.

Objective HU 03:

Concentrate activities in existing developed areas, rather than developing new areas in lynx habitat.

Objective HU 04:

Provide for lynx habitat needs and connectivity when developing new or expanding existing developed recreation sites or ski areas.

Objective HU 05:

Manage human activities, such as special uses, mineral and oil and gas exploration and development, and placement of utility transmission corridors, to reduce impacts on lynx and lynx habitat.

In addition to Objectives, the following SRLA Guidelines also apply to the winter recreation planning. Guidelines are non-discretionary. The Forest Service NEPA associated with the Special Use Permit for this project must clearly demonstrate how the project is consistent with these Guidelines. A Guideline MUST be followed unless there is rationale included in the project NEPA explaining why and how it does not apply to the particular project being evaluated.

Guideline Human Uses G3 (HU G3): Recreation development and recreational operational uses should be planned to provide for lynx movement and to maintain the effectiveness of lynx habitat.

SRLA Guideline HU G10: Designated over-the-snow routes or designated play areas should not expand outside baseline areas of consistent snow compaction, unless designation serves to consolidate use and improve lynx habitat. This may be calculated on an LAU basis, or on a combination of immediately adjacent LAUs.

Winter recreation planning activities must also demonstrate compliance with the following plan components of the SRLA:

Objective ALL 01: Maintain or restore lynx habitat connectivity in and between LAUs, and in linkage areas.

Baseline conditions for designated and groomed winter routes on the Rio Grande National Forest were established in the Final Environmental Impact Statement (FEIS) for the Southern Rockies Lynx Amendment (USDA Forest Service 2007). These numbers represent the allowable snow compaction baseline conditions for the RGNF.

From: Table 3-24, Southern Rockies Lynx Amendment FEIS

| Rio Grande National Forest | NFS Total Miles of Designated Routes | NFS Total Miles Groomed Routes | NFS Total Miles of Groomed or Designated Recreation Winter Trails and Routes in Lynx Habitat within LAUs | NFS Total Miles of Groomed or Designated Recreation Winter Trails and Routes within LAUs |
|-----------------------------------|---|---------------------------------------|---|---|
| TOTALS | 314 | 167 | 196 | 319 |

In addition to the numbers above, there are approximately 128,208 acres of concentrated dispersed winter recreational use (i.e. winter snowmobile play areas) occurring on the Rio Grande NF. While some of these acreages may be included in the table above, the Rio Grande National Forest considers most of this as additional acreage that is considered to be snow compacted (Rio Grande National Forest 2011).

Summary: We have concerns that snow compaction baselines on the RGNF have increased considerably since the SRLA baseline was established and that current conditions may be inconsistent with the thresholds provided for in the SRLA. Any potential additional effects on snow compaction must be

thoroughly evaluated in the NEPA analysis associated with this activity proposal and effects on Threatened and Endangered Species (TES) and Species of Conservation Concern (SCC) minimized. While consistency with all of the management direction in the SRLA is important, *we are particularly concerned about compliance with Guideline HU G10 and overall effects on lynx habitat.*

Recommendations

The Southern Rockies Lynx Amendment (SRLA) should be a guiding document for decision making to create the Winter Recreation Planning document. This is because there are specific plan components (Standards, Guidelines, and Objectives) associated with the SRLA in regards to winter recreational activities that are incorporated into the revised forest plan for the RGNF. Although these plan components were developed specifically for Canada lynx, they also provide potential benefits for other numerous other wildlife species. The most relevant of these plan components are mentioned above.

Snow Compaction, where is the analysis?

Groomed snowmobile routes contribute to snow compaction. Likewise, repeated snowmobile use on trails and “play areas” can also result in snow compaction. The snow compaction baseline for the RGNF (and all forests in USFS Region 2) was established in the 2007 FEIS for the SRLA and is incorporated into the new plan revision.

Special attention needs to be given to the large snowmobile “play areas” on the Conejos Peak Ranger District which were never incorporated into the legal snow compaction baseline. Conflict and potential wildlife issues around La Manga pass and Cumbres needs special planning and thoughtful problem solving.

It also appears that all current groomed snowmobile routes are not included on the ROS maps. The RGNF is therefore starting with an inaccurate baseline map for snow compaction. The RGNF needs to display the current snow compaction baseline map in relationship to the existing condition and action alternatives. current and proposed compaction, by alternative. Information should be provided how the groomed (compacted) routes comply with the snow compaction guidelines allowed for in the Southern Rockies Lynx Amendment (SRLA).

Species of Conservation Concern

Impacts to Species of Conservation Concern (SCC) must be addressed. This is especially important on the RGNF because the revised forest plan is not in compliance with the 2012 Planning Rule in regards to identifying and developing plan components for the key ecosystem characteristics for several SCC species that may be specifically impacted by winter motorized recreation.

The monitoring plan framework similarly lacks any connection to the key ecosystem characteristics for some vulnerable species. For example, the white-tailed ptarmigan is a Tier 1 SCC that migrate down from the alpine tundra and utilize forested areas and willow thickets just below treeline for wintering habitat. These areas are not mapped, protected or identified for monitoring and may be vulnerable to disturbance from motorized winter activities.

Other species that may be impacted include American marten, boreal owl (roosting and nesting sites), and Rocky Mountain bighorn sheep (wintering habitat).

Aquatic Species

Rio Grande Cutthroat Trout, Rio Grande Chub, and Rio Grande Sucker are native fish species found in the San Luis Valley, including the Rio Grande National Forest. All of these are Tier 1 (most rare/sensitive) species in the Colorado State Wildlife Action Plan. The plan should include provisions to limit damage to streams including indirect impacts to water quality.

Previous Decisions within 1996 and 2014 RGNF Visitor Maps

According to previous visitor maps created by the Rio Grande National Forest, Over the Snow motorized travel did have some restriction areas. On the 1996 maps, the Management purpose of snowmobile restriction in “B” areas (primarily lower elevation areas), were identified as “big game winter range” areas. There were also, snowmobile closures, labeled as “C areas”, near the Wolf Creek Ski Area.

The 2014 maps also indicate specific roads through these areas that are “designated routes” through “restricted areas. (Green line roads).” It’s imperative that these “restricted areas” be included in the EIS moving forward.

Further considerations in scoping

Noise impacts

Noise impacts cannot be underestimated. Soundscape modeling (Region 5 did this on some forests, using groomed OSV trails as “point sources”) to first understand potential noise impacts. Then the next step is to analyze how to minimize with landscape features, etc. Important to consider what sensitive resources are nearby (nesting/breeding birds, other wildlife, Wilderness soundscapes, use conflict, etc) and tailor your minimization to these needs.

Law Enforcement

Design an enforceable plan, important to think about implementation from day 1 of planning. For effective enforcement, a plan that makes sense on the ground, that includes OSV users as “eyes willing to report incidences”, within a USFS field presence. Also, consider the Colorado Mountain Club Snow Ranger program, <https://www.cmc.org/conservation/backcountry-snowsports-initiative> as an example of how to increase field capacity (not enforcement, but education). Working with partners on educational resources is critical. (suggesting Tread Lightly as an important partner here), etc.

New Technology

Winter recreation planning will need to address emerging over-the-snow devices such as wheeled or rubber track travel, unicycles, etc.

Primitive Areas vs Wilderness Boundaries

Primitive Areas do not encompass the same boundaries as Wilderness. There is a distinction regarding distance from a road (primitive vs wilderness) and that discrepancy requires explanation in the Winter Recreation Planning document. It also needs to be included in the Forest Plan. If it is not, then the Forest Plan should be amended.

In reviewing the Conejos Peak Ranger District map, it appears that not all Maintenance Level 1 (Closed) Roads are on the map. This is required to ensure proper mapping for Primitive land designations. Application to and Compliance with the Southern Rockies Lynx Amendment (SRLA).

Compatibility with Bureau of Land Management (BLM) Travel Planning, and other neighboring Forests

SLV BLM lands in many places offer the gateway to RGNF lands and continuity with their BLM Travel Management decisions must be considered to maintain continuity when entering the Forest. This consideration is also important to maintain with neighboring Forests.

Socio-Economic Analysis

It was mentioned at the Alamosa public meeting that a strong consideration of the planning effort was to focus on the socio-economic impacts of winter recreation. We are not sure what that will entail, but hopefully a strong focus of it will be “Ecosystem Services.” SLVEC submitted comments about this important aspect during the RGNF revision, and unfortunately, very little of it ended up in the final plan. Ecosystem Services should be the baseline of any socio-economic analysis, because the natural resource

base provides the ability for any economic driver to occur. It should also be noted, that quiet uses are still the prominent reason people recreate in the Rio Grande Forest.

SLVEC has tried to stay focused with our comments, but this Winter TMP process encompasses so much consideration around potential impacts and solutions for the management of the Rio Grande Forest. It is our intention to outline some of these concerns here. Thanks so much for your time and consideration in moving this process forward.

Sincerely,



Christine Canaly, Director
San Luis Valley Ecosystem Council
P.O. Box 223
Alamosa, CO 81101
info@slvec.org www.slvec.org

References

USDA Forest Service 2007. Southern Rockies Canada Lynx Amendment Final Environmental Impact Statement. Rocky Mountain Region. 231 pp.

Rio Grande National Forest 2011. Lynx Habitat Model and Mapping Criteria: San Luis Valley Public Lands Center. Rio Grande National Forest and San Luis Valley BLM. October 7, 2011. R. Ghormley, prep

Attachments

1. Assessment/border/Uses compilation
2. SLVGO Wildlife Recreation Impacts map
3. CPW HPH map layers
4. RGNF Lynx Linkage Areas
5. RGNF Lynx Conditions synopsis
6. CPW Mean Wildlife Impact map