



# COLORADO

## Parks and Wildlife

Department of Natural Resources

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Dillon Ranger District  
White River National Forest  
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November 4, 2024

RE: Jones Gulch Area Closure

Ms. Amanda Wheelock,

Colorado Parks and Wildlife (CPW) has received a request to comment on the United States Forest Service (USFS) proposal to implement the Jones Gulch Area closure in Keystone. CPW's mission is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. CPW has reviewed the proposed project and would like to offer the following comments supporting this proposal.

The USFS is proposing a Forest Supervisor's Closure Order on the Dillon Ranger District of the White River National Forest in Jones Gulch (adjacent to the Keystone Ski Resort in Summit County, Colorado) via a Categorical Exclusion. The purpose of the proposed winter closure of Jones Gulch is to protect winter habitat for federally threatened Canada lynx. The proposed closure (November 1<sup>st</sup> to April 30<sup>th</sup>, annually) will restrict human occupancy and would limit recreational access to Jones Gulch from Forest Service lands outside of the ski area, intending to complement the existing ski area closure.

### Lynx

CPW has the Jones Gulch area mapped as lynx breeding habitat, predictive summer habitat, and predictive winter habitat. The type of habitat that this area provides is limited and crucial to sustaining the lynx and snowshoe hare populations in the White River National Forest. Maintaining habitat connectivity is considered to be critically important to sustaining lynx populations in the Southern Rockies.



Jeff Davis, Director, Colorado Parks and Wildlife

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Lynx are tolerant of non-motorized recreation in dispersed, low use areas (i.e., relatively few visitors per day, such as areas around Silverton; Olsen et al. 2018). Their movement patterns, behavioral patterns, and patterns of habitat selection show no sign of disruption due to people. However, as non-motorized activity increases to moderate or moderately high levels of intensity (i.e., Leadville and Vail Pass Winter Recreation Area), lynx respond by becoming more nocturnal and slowing their movement rate during the day (e.g., presumably remaining stationary and hiding out). Some individuals may also shift their space use away from parts of their home range experiencing the heaviest use. Lynx strongly avoid the highest levels of human recreation (i.e., developed ski areas). The limited use they do exhibit in these places occurs at night rather than during the day, on weekdays rather than weekends, and shoulder seasons rather than heavy-use seasons (Olson et al. 2018).

In dispersed, low use areas, lynx tolerate motorized use (e.g., snowmobiles; Squires et al. 2019). However, as motorized use occurs more widely in their home range, lynx respond by actively avoiding areas where those activities occur. Avoidance can be detected when off-trail motorized use overlaps as little as 10-20% of their home range, and that avoidance strengthens as motorized use occurs more widely. Lynx are more tolerant of on-trail motorized use, not exhibiting avoidance until 20-30% of their home range is overlapped by this type of recreation. The higher the proportion of their home range that is subject to on-trail motorized use, the stronger their avoidance of those areas becomes (Squires et al. 2019).

Considering the above literature review, CPW supports a winter recreation closure in Jones Gulch when snow is present on the landscape.

### Summary

CPW supports a winter recreation closure in Jones Gulch, when snow is present on the landscape, to protect lynx and snowshoe hare. CPW would like to thank the Dillon Ranger District of the White River National Forest for the opportunity to comment on the closure proposal. If you have any questions, contact Hannah Grimes at 970-485-3081 or [hannah.grimes@state.co.us](mailto:hannah.grimes@state.co.us).

Sincerely,



Travis Black- Northwest Regional Manager (CPW)

CC: Jeromy Huntington- Area Wildlife Manager (CPW)  
Elissa Slezak- Terrestrial Biologist (CPW)  
Hannah Grimes- District Wildlife Manager- Summit County (CPW)



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## REFERENCES:

Olson, L.E., Squires, J.R., Roberts, E.K., Ivan, J.S., & Hebblewhite, M. (2018). Sharing the same slope: behavioral responses of a threatened mesocarnivore to motorized and nonmotorized winter recreation. *Ecology and Evolution*, 8(16), 8555-8572.

Squires, J.R., Olson, L.E., Roberts, E.K., Ivan, J.S., & Hebblewhite, M. (2019). Winter recreation and Canada lynx: reducing conflict through niche partitioning. *Ecosphere*, 10(10), e02876.



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