

Data Submitted (UTC 11): 10/1/2019 6:00:00 AM

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Title:

Comments: Formal Objection

R[acute]o Grande National Forest

Formal Objection sent via email to: r02admin_review@fs.fed.us

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Conejos Clean Water is formally objecting to the Rio Grande National Forest Final Forest Plan, the Final Environmental Impact Statement and Record of Decision.

Responsible Official: Dan Dallas

Forest Supervisor

Rio Grande National Forest

Dear Forest Supervisor Dallas:

Conejos Clean Water is grateful for the opportunity and ability to object to the Rio Grande National Forest Final Forest Plan, Final Environmental Impact Statement and Record of Decision. Conejos Clean Water is formally objecting to the exclusion of the Spruce Hole/Osier/Toltec and Chama Basin Watershed Protection Special Interest Areas (SIAs) found in Alternative D from the preferred alternative, and reduction in forest-wide Wildlife Plan Components found in the Final Forest Plan, Final Environmental Impact Statement and Record of Decision. Conejos Clean Water is also formally objecting to the Rio Grande National Forest's failure to incorporate the best available science in the overall plan, plan amendment and overall plan revision process that should support the inclusion of the Spruce Hole/Osier/Toltec Special Interest Area, Chama Basin Watershed Protection Special Interest Area, and should also increase forest-wide Wildlife Plan Components in the Final Forest Plan and Final Environmental Impact Statement. We believe that the Rio Grande National Forest Final Plan and Environmental Impact Statement do not provide adequate management direction for place-based and large-landscape-scale wildlife and wildlife habitat management.

* Exclusion of Spruce Hole/Osier/Toltec and Chama Basin Watershed Protection SIA and lack of any reason for

exclusion

- * Reduction in Forest Wide Wildlife Plan Components

- * Lack of best available science in excluding SIAs and reducing Forest-wide Wildlife Plan Components

- * Failure to adequately address the reason for specific SIA inclusion and reduction in forestwide wildlife plan components

Based on the Final Plan, Final Environmental Impact Statement, and Record of Decision, we object to the Rio Grande National Forest's decision to exclude the addition of the Spruce Hole/Osier/Toltec Special Interest Area and Chama Basin Watershed Protection Special Interest Area as well as the reduction of Forest Wide Wildlife Plan Components. Conejos Clean Water has been actively advocating (in our comments submitted on 12/11/17) for the inclusion of multiple Special Interest Areas including the Spruce Hole/Osier/Toltec Special Interest Area, Chama Basin Special Interest Area and Forest-wide Wildlife Plan Components that best reflect and strengthen the Rio Grande National Forest's management direction of habitat for wildlife at a place based and large-landscape scale. As previously mentioned in our formal comment:

* "Designating the Chama Basin Watershed Protection Area will protect this remarkably scenic and unusual basin and the water it provides to New Mexico. Designating the Spruce-Osier wildlife corridor connecting the Carson and Rio Grande National Forests will ensure management focused on protecting wildlife movement and habitat connectivity."

We believe the justification as to why these Special Interest Areas were excluded is insufficient. We agree that habitat connectivity and wildlife corridors are maintained through designated wilderness areas, Colorado roadless, and wild and scenic river designation but formally disagree that these designations provide adequate protections for areas on the forest with high wildlife characteristics nor within existing wilderness or Colorado Roadless Areas.

We believe that the best-available science was not utilized when deciding to exclude the Spruce Hole/Osier/Toltec and Chama Basin Watershed Protection Special Interest Areas in the Final Plan, Final Environmental Impact Statement, and Record of Decision. For example, data gathered from the 2016 Wildlife Doorways Workshop Report compiled from Colorado Parks and Wildlife, Colorado Natural Heritage, the Colorado Department of Transportation, the Jicarilla Apache Tribe, the New Mexico Department of Game and Fish, and New Mexico Department of Transportation was not utilized. A large amount of science driven data has been collected to illustrate the movement of various terrestrial species such as Rocky Mountain Elk and Mule Deer that utilize these priority and forest-wide landscapes on the Rio Grande National Forest for various ecological purposes.

We believe increasing and adopting the following forest-wide wildlife plan components found on (pp.25-30) of the 2017 Draft Revised Land Management Plan will provide for greater and more detailed management of wildlife and wildlife habitat that will increase ecological integrity for the duration of the Forest Plan and future of the forest as directed in substantive requirements of the 2012 Planning Rule require the Forest Service to include plan direction, incorporating standards and guidelines, to maintain and restore connectivity. The designation of the Spruce Hole and Chama Basin SIAs is clearly consistent with the requirements under 36 CFR [sect] 219.8. These SIAs are critical to ensuring connectivity between Colorado and New Mexico for mule deer, elk, Rocky Mountain bighorn sheep, Canada lynx, cougar and other species. 36 C.F.R. [sect] 219.8(a).

FEIS at 135

The Forest Service provides little detail as to why it believes the plan sufficiently protects wildlife species, habitat, and migratory routes. There are no actual plan components for at risk species, except for inadequate plan components for the Canada lynx. Those components that do exist for wildlife and habitat connectivity will not sufficiently protect the SIA and the vital role it plays in connecting wildlife habitat. Finally, as discussed below,

some plan components that offered protections under the draft LMP are removed from the final LMP, reducing even further the protections in place for wildlife and habitat connectivity.

Absent further analysis from the Forest Service we disagree with their conclusion that the Spruce Hole SIA is "adequately protected." There is high oil and gas potential in Spruce Hole and as a result, without sufficient protections in place, the area is susceptible to oil and gas development. Such development would have serious implications for migrating wildlife.² By managing the area as an SIA for wildlife migration and connectivity and for high quality wildlife habitat, the Forest Service will be better able to prevent and/or minimize these detrimental impacts.

FEIS at 136

While we agree that habitat connectivity and wildlife corridors are maintained through designated wilderness areas, Colorado roadless and river areas eligible for wild and scenic rivers designation in this SIA are insufficient protections of wildlife values and do not adequately provide for the necessary protections for wildlife connectivity and critical habitat throughout the SIA. While these designations are certainly a good start they do not go far enough in preventing impacts from oil and gas development or in preventing impediments such as fences being built in important wildlife habitat and corridors. Therefore the additional protections of an SIA are necessary to ensure the area is managed for connectivity and habitat.

Desired Conditions

DC-WLDF-6: Promote habitat conditions that result in the prevention and control of wildlife-related pathogens and diseases, such as chronic wasting disease. (Forest-wide)

DC-WLDF-8: Manage northern goshawk nesting territories on the basis of nest site, post-fledging, and foraging area needs. Nest site buffers should encompass 25-30 acres and post-fledging areas 420 acres, with considerations for surrounding foraging habitat. (Forest-wide)

DC-WLDF-9: Maintain a road density of 1.5 miles/per square mile or less in winter concentration areas, winter range, calving areas, and transition habitat. (Forest-wide)

DC-WLDF-10: Where possible, retain public ownership of wildlife travelways adjacent to public highways, or where public lands are identified as a key component in maintaining the integrity of seasonal movements by wildlife. (Forest-wide)

DC-WLDF-11: Maintain habitat components of size, quality, and spatial extent necessary for the landscape to provide for connectivity of movement between seasonal habitat (i.e., wildlife travelways) as identified and mapped by Colorado Parks and Wildlife or other science-based partners (e.g., Colorado Natural Heritage Program). (Forest-wide)

Standards

S-WLDF-3: Provide security habitat in winter range, winter concentration areas, severe winter range, and lambing areas during big-game use seasons from December 1 to March 31. Employ access restrictions and seasonal closure as necessary. Dates may vary depending upon variations in winter use. (Forest-wide)

S-WLDF-9: Maintain screening cover to minimize the disturbance and harassment of deer and elk along open roads and around openings on the basis of site conditions. Design screening cover design consistent with the disturbance regime characteristics of the forest cover type it is occurring in. (Forest-wide)

S-WLDF-12: Do not authorize actions that reduce the effective use of habitat on severe winter range and winter concentration areas between approximately November 1 and April 15. (Forest-wide)

Management Approaches

MA-WLDF-9: Use vegetation management and habitat improvement strategies, including but not limited to prescribed fire, thinning, building stock ponds, and guzzler placement, to help achieve and maintain desired conditions for big game winter habitat. (Forest-wide)

MA-WLDF-22: Manage off-road travel on big game winter range areas, including over the snow track machines, during the primary use seasons for big game. Exceptions may be authorized under special use permit. (Forest-wide)

MA-WLDF-23: Design management activities to provide forage and cover across the landscape to sustain ungulate populations and to support state population objectives. (Forest-wide)

MA-WLDF-24: Maintain habitat components necessary to provide for connectivity of seasonal habitats as mapped by Colorado Parks and Wildlife. (Forest-wide)

MA-WLDF-27: Identify and assess habitat connectivity needs at various spatial scales when conducting forest management activities at the project level, as necessary, on the basis of existing landscape patterns and local species concerns. Use a nesting of hydrologic unit codes at the scale(s) necessary to assess connectivity patterns (e.g., 8th-level hydrologic unit codes or smaller). Identify and use key stream zones and topographic features to help facilitate movement across broader landscapes. Movement zones of 400 to 600 feet in width may be sufficient to facilitate movement for most local species of conservation concern, including large predators, in most landscape conditions. (Forest-wide)

Colorado Parks and Wildlife recently released a Department of Interior directed State Wildlife Action Plan that identifies the South San Basin as the #2 area of priority recognizing high wildlife use in the San Juan Basin and Chama Basin Special Interest Area. The State Wildlife Action Plan also identifies GMU's 80/81 and 78, which contain the Spruce Hole/Osier/Toltec Special Interest Area as additional corridor(s) for future work with herds numbering nearly 6,000 rocky mountain elk and 6,000 mule deer.

Suggested Improvements

We believe by including the Spruce Hole/Osier/Toltec, Chama Basin Special Interest Area, and listed Forest-wide Plan Components, the Rio Grande National Forest can improve the Final Plan by:

- * Providing long-term place based protection for terrestrial species that utilize migration corridors on the forest landscape for various ecological purposes.
- * Leveraging management/resource dollars for on the ground project level work in areas that are important to wildlife and habitat connectivity.
- * Increasing cross-jurisdictional collaboration and management with neighboring forests, states to address wildlife species moving across multiple jurisdictional boundaries. (e.g. Carson National Forest, San Antonio Management Area in New Mexico)
- * Recognizing that the 36,000-acre Spruce Hole/Osier/Toltec SIA is a key migratory route for a number of species moving between Colorado and northern New Mexico. These species include mule deer, pronghorn, Rocky Mountain bighorn sheep and Canada lynx. The importance of this area to wildlife movement was highlighted in the 2016 Wildlife Doorways Report. This report identified the SIA as the northern reach of the Northern Taos Plateau Wildlife Movement Focal Area that spans through the RGNF, Carson National Forest, and the Rio Grande del Norte National Monument. The Spruce Hole/Osier/Toltec SIA and neighboring San

Antonio Management Area found in New Mexico's Carson National Forest Draft Plan provide connected and adjacent wildlife habitat to many species that utilize the multiple jurisdiction forest landscape.

* Acknowledging that the 17,790-acre Chama Basin Watershed Protection Special Interest Area encompasses the headwaters of the Rio Chama. The area has a high potential for oil and gas development so it is important the area is protected in the forest plan. This area is of critical economic and cultural importance to local communities within Rio Grande, Mineral, Alamosa, Costilla, Saguache, and Conejos Counties. This area is of critical importance due to the close proximity and cross border collaboration with the Carson NF, New Mexico Department of Game and Fish, and Tribal Communities.

Conclusion

We appreciate the opportunity to object to the Rio Grande National Forest Final Forest Plan, the Final Environmental Impact Statement and Record of Decision. We hope the Forest Service takes into account our serious concerns about the exclusion of the Spruce Hole/Osier/Toltec and Chama Basin Special Interest Areas in the final plan, and works with the public to develop a Forest Plan that protects habitat connectivity and high quality habitat.

Literature Cited

Wildlife Doorways Workshop Report:

https://nhnm.unm.edu/sites/default/files/nonsensitive/newsfiles/WildlifeDoorways_NHNM%20Final%20Report%20for%20Website.pdf

Colorado State Wildlife Action Plan:

<https://www.nfwf.org/westernmigrations/Documents/colorado-state-action-plan.pdf>

Signature /s/ Anna Lee Vargas Date: 10/01/2019

Anna Lee Vargas, Director of Project Management and Community Outreach