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July 21, 2020

RE: Revised Draft Rico Trails Project Environmental Assessment

Dear Derek,

Colorado Parks and Wildlife appreciates your efforts to address our scoping and Draft Environmental Assessment comments with the Revised Rico Trails Project EA (Revised EA). Notably, the Revised EA includes Alternative 3 which differs from Alternative 2 by not including the motorized decommissioning of 1.9 miles of motorized trail near the Spring Creek Trail, and by adding a seasonal access restriction for the Ryman Creek Trail. In the new Alternative 3, the segment of the Stoner Creek Trail (NFSR #625) from the east end of West Twin Springs Trail (NFSR #739) to the intersection with East Twin Springs Trail (NFSR #741), would remain open for motorized use as currently designated. In this letter, CPW is building on comments from previous submitted comments in regards to the Rico Trails project.

Herd Management Plan

As you are aware, CPW is in the process of revising our Herd Management plan for the Disappointment Creek Elk Herd, E-24. For the past 2 years this population has been under the population management objective that is outlined in the current plan. As we move forward with the new plan, we anticipate that the Parks and Wildlife Commission will adopt a population management objective that would dictate increasing the elk population. In a recent effort by CPW to gauge public desires for elk management in E-24, the public expressed concern about the current number of elk and overwhelmingly wanted more elk in the local populations. This included hunters, non-consumptive users, and agriculture producers.

Impacts from roads and trails on elk

The ecological impacts from roads and trails is well documented in the literature (Trombulak et al 2000, Hebblewhite 2008). Impacts to wildlife from trail use are often negative and are associated with increased direct disturbance and displacement from optimal habitat (Larson et al 2016). Due to avoidance of human activities associated with roads and trail based recreation (atvs, mountain biking and hiking), elk increase their daily activity levels and movements which reduces the time spent feeding or resting (Cuiti et al 2012, Naylor et al

2009, Wisdom et al 2004). This increased energy expenditure, decreased forage intake, and displacement to areas with poorer quality forage results in a decrease in body condition, which affects individual health, survival and reproduction (Bender et al 2008, Johnson et al 2004).

Avoidance of recreationalists effectively decreases the carrying capacity of an area (Taylor and Knight 2003). Contrary to popular opinion, elk and deer generally do not habituate to hiking or mountain biking (Wisdom et al 2004, Wisdom 2018, Taylor and Knight 2003). Cumulatively, increased human activity associated with increased density of roads and trails leads to both immediate and long-term effects on individual animals and populations by decreasing the available energy for winter survival, growth, reproduction, reducing the fitness of wildlife, and by displacing wildlife into marginal habitats (Cuiti et al 2012, Anderson 1995). Elk avoidance and displacement away from roads and motorized and non-motorized trails have been documented (Preisler et al 2013, Rogala et al 2011, Wisdom 2004, Wisdom 2018) Limiting seasonal recreational activities during elk production is supported in the literature (Phillips and Alldredge 2000).

USFS is a key component in helping protect and manage lands that are key to the survival of Colorado's elk and deer herds. The San Juan National Forest Land Management Plan (SJLMP) emphasizes the importance of big game production and critical wintering areas and in protecting them in Section 2.3 of the SJLMP. The SJLMP also includes a seasonal restriction on single track motorized and non-motorized routes per the LMP 2.3.59 of May 15-June 30 in areas mapped as elk production areas. These restrictions would help to increase security of ungulates in the production areas by avoiding the bulk of the calving time period.

We believe that sufficient biological evidence exists to justify the implementation and enforcement of seasonal closures to minimize disturbance to elk during the parturition period. Therefore, our recommendation is that the Ryman Creek Trail is closed to all user groups from May 15- June 30 between Highway 145 and the Divide Road. The closure of this trail would create a much larger and more effective security area for elk (in excess of 6,000 acres) while having a relatively low impact on recreational trail users of the forest.

Seasonal access compliance

Based on our experience around Durango and Ridgway, compliance with seasonal closures at a trail junction can be a problem, and may be a serious issue for Ryman Creek if the Salt Creek trail were to remain open. The best and most passive way to enforce seasonal closures is to have a physical barrier at the parking lot (e.g. gated access). That way there is no confusion with the public about which trails are open and when.

If Salt Creek were to be also similarly managed with a seasonal closure that would more than double the security area acreage for elk production, increase habitat effectiveness, and be a major benefit for elk and other wildlife. If a seasonal closure of Salt Creek is a possibility within this NEPA document, we support its inclusion in the analysis and will advocate and provide rationale for an alternative that has this route seasonally closed.

Other Seasonal Closures

CPW staff are planning to propose a seasonal closure at the Fish Creek State Wildlife Area to protect the elk production area. The Parks and Wildlife Commission has recently directed

staff to examine how we manage our state wildlife areas and ensure that we emphasize their use for wildlife habitat and wildlife-related recreation. A seasonal closure would fit well with that direction and we are hopeful that change will be approved in the near future. If we are able to get the seasonal closure in place, we request that the Forest Service consider closing the trail above the wildlife area with the same timing restriction. This would increase the protected acreage from roughly 270 acres on CPW managed lands to about 9,000 acres in the drainage by closing that trail. It would also help with compliance, as users would learn that the entire trail is closed rather than encountering the closure once recreationalist get to the SWA boundary.

Spring Creek Trail Alternative 3

In respect to the 1.9 miles of Stoner Creek trail, CPW supports the decommissioning of the trail in Alternative 2. The 1.9 miles of trail is redundant with little to no benefit to the recreational users if it were allowed to stay. The trail connects to the West and East Twin Springs junction with the change from non-motorized to motorized section indicated in yellow of the map provided.

Conclusion

Thank you for including an alternative that has a seasonal timing restriction on Ryman Creek. We appreciate you being responsive to our previous comments and subsequent conversations regarding visitor and wildlife management in the Rico area. If you have any questions concerning these comments, please feel free to contact myself or local District Wildlife Manager Matt Sturdevant at (970) 749-1435. We look forward to continuing to work with you on these complex management issues.

Sincerely,

MR Thpe #997

Matt Thorpe

Area Wildlife Manager

Cc: Matt Thorpe, Area Wildlife Manager; Cory Chick, SW Regional Manager; J. Holst SW Region Energy Liaison; B. Magee SW Land Use Coordinator; B. Weinmeister Area 15 Terrestrial Biologist; Area 15 File

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