



Sheep Mountain Alliance

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July 23, 2020

Derek Padilla, District Ranger
Dolores Ranger District
United States Forest Service
29211 Hwy 184
Dolores, CO 81323

Via Email Only: Derek J. Padilla (dpadilla@fs.fed.us);
Cc: thomas.b.rice@usda.gov and keith.fox@usda.gov

RE: Rico Trails Project - Comments on the June 2020 Revised Draft Environmental Assessment (EA)

Dear Mr. Padilla:

Sheep Mountain Alliance (SMA) thanks the San Juan National Forest for the opportunity to comment on the Rico Trails Project Revised EA. Sheep Mountain Alliance is a 31-year-old grassroots environmental organization representing over 800 members and supporters in the San Miguel and Dolores River watersheds, the central San Juan Mountain region, and Southwest Colorado. We also serve the many residents and visitors who rely on this region's intact ecosystems, wildlife, air and water quality to support their livelihoods, well-being, and recreation. SMA and its members have long had a vested interest in the fate Rico West Dolores area, and continue to be involved in negotiations around the Travel Management Plan.

Sheep Mountain Alliance supports the comment letter submitted by Robert H Marion and Colorado Backcountry Hunters and Anglers (CBHA) dated July 23rd, 2020. At a CPW meeting held this past winter in Norwood, SMA heard about elk herd decline and predator management plans. CPW displayed data showing a concerning drop in cow-calf ratios to below sustainable herd objectives, and this data was backed up by the shared experiences of many attendees. Elk herds in SW Colorado region are in decline, according to CPW, and it is critical that precautionary measures be taken immediately to address all potential causes of elk herd decline. New mountain-biking and motorized trails are likely to pose yet another obstacle to long-term herd recovery, due to the demonstrated impacts by motorized, mechanized, and even hiking use of trails on elk and calving elk. We believe that new trails should be considered only when and if elk herds have rebounded to herd objectives. However, we do commend the San Juan District for adding in a proposed seasonal closure for Ryman Creek. This is the minimum measure that can be taken to help protect local herds. The Forest Plan section 2.3.59 states: "Projects or activities

that adversely impact pronghorn and elk production areas should be limited or avoided.” It is imperative that the proposed trails planning effort align with this directive.

Finally, SMA believes that the EA must be completed as an EIS, as this Project cannot be viewed in isolation from the overlapping area addressed in the recent EIS for RWD TMP Area. The potential for these proposed trail designations was already addressed in the EIS. The new trails and trail designations will increase elk disturbance and isolate elk habitat. A reanalysis of the entire RWD TMP Area EIS with these new trail and trail designation proposals included is required in order to properly quantify the potential impact of the entire system on wildlife and habitat.

Sheep Mountain Alliance’s staff, board, members, and constituents plan to remain engaged in future stages of the planning process. If you have any questions, please feel free to contact us at lexi@sheepmountainalliance.org

Regards,
Karen (Lexi) Tuddenham
Executive Director
Sheep Mountain Alliance

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