



**Summary of Comments
for the
Great Sand Dunes National Park**

**Ungulate Management Plan and Environmental Impact Statement Public
Scoping Period**

February 2012

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DEFINITION OF TERMS

Key terms used in the analysis of and response to public comments as defined in PEPC are below.

- **Correspondence:** Any format of feedback received from the public.
- **Code:** Used to represent a topic or subject matter with which the public is concerned. A code is simply a way of organizing similar comments under one topic that represents specific subject matter.
- **Comment:** Text selected from correspondence and coded to a particular topic or subject matter.
- **Representative Quote:** A comment that exemplifies many other comments under a specific code.
- **Concern:** A statement that summarizes the voice of the public.

“The Public Comment and PEPC Step 7: Managing the Comment Analysis Process User Guide”. March 2008.

PEPC Glossary at <https://pepc.nps.gov/help/glossary.cfm>

ANALYSIS OF COMMENTS RECEIVED DURING THE PUBLIC SCOPING PERIOD

INTRODUCTION

The Great Sand Dunes National Park and Preserve Ungulate Management Plan/Environmental Impact Statement (EIS) Public Scoping comment period began on October 28, 2011. The public comment period ended on January 6, 2012.

Correspondence received during the public comment period included letters and web forms submitted via the National Park Service (NPS) Planning, Environment and Public Comment website (PEPC). The NPS received a total of 16 signatures on 16 correspondences, which were distilled into 51 individual comments.

There were no form letters in the correspondences. The distributions of correspondence received are expressed in Table 1 through Table 4 below. There were a total of 6 requests including 2 for information, 1 for the mailing list, 1 for a document, and 2 requests which did not fit into specified categories.

The TQ1-43893 code was used most frequently to qualify comments (see Table 1). The TQ1-43893 comments were responding to the question, “What issues should the NPS consider when evaluating the possible establishment of a semi-free ranging bison population?”

CODING OF COMMENTS

The NPS analyzed correspondence received regarding the Program/DEIS to identify and respond to the topics that were of concern to the public. The correspondence was analyzed using the following steps:

- Aggregate and catalog correspondence using PEPC
- Analyze correspondence and extract individual comments
- Develop coding structure and assign codes to comments

The coding structure was designed to categorize comments based on responses to the four questions posed to the public as part of the Public Scoping Newsletter and the Public Scoping Meetings held on November 14 and 15, 2011.

Once the comment period had ended, all correspondences were reviewed and each comment was assigned a code or codes from those listed in Table 1. Following coding, all comments were analyzed by code to categorize issues and topics of concern raised by the public. In total, there were 51 non-substantive comments coded.

Reading, coding and analyzing comments aided the NPS in determining the public’s concerns, in order to help guide the research which will go into the EIS.

ORGANIZATION OF COMMENTS

This report contains a summary of comments received regarding the Public Scoping Newsletter and the Public Scoping Meetings. The comments are organized by the codes listed in Table 1 below. Correspondence received by type (i.e. web form or letter) are demonstrated in Table 2. The distribution of organization types commenting are presented in Table 3, and the distribution of correspondence received by state are presented in Table 4. All correspondences received originated in the United States. Following the tables, an index of all correspondence received by category and author is presented.

TABLE 1. COMMENT DISTRIBUTION BY CODE

Code	Description	Number of Comments
TQ1-43893	What issues should the NPS consider when evaluating the possible establishment of a semi-free ranging bison population?	21
TQ2-43893	What issues should the NPS consider when evaluating if and when management actions should be used to influence elk populations?	8
TQ3-43893	What management tools should the NPS consider for managing elk, bison, and other ungulates?	17
TQ4-43893	What other issues or opportunities should the NPS consider in this planning process?	10
Total use of codes*		56
Total # of comments		51

*The use of codes exceeds the number of comments because a single comment can be associated with multiple codes

TABLE 2. CORRESPONDENCE DISTRIBUTION BY CORRESPONDENCE TYPE

Correspondence Type	Number of Correspondences	Number of Signatures
Letter	5	5
Web Form	11	11
Total	16	16

TABLE 3. CORRESPONDENCE DISTRIBUTION BY ORGANIZATION TYPE

Organization Type	Number of Correspondences	Number of Signatures
Federal Government	1	1
State Government	1	1
Unaffiliated Individual	14	14
Total	16	16

TABLE 4. CORRESPONDENCE DISTRIBUTION BY STATE

State	Percentage of signatures	Number of Signatures	Percentage of correspondences	Number of Correspondences
CA	6.25%	1	6.25%	1
CO	62.5%	10	62.5%	10
NC	6.25%	1	6.25%	1
NJ	12.5%	2	12.5%	2
TX	12.5%	2	12.5%	2
Total	100.00%	16	100.00%	16

INDEX OF CORRESPONDENCE BY TYPE OF AUTHOR

(See Table 1 for a description of codes.)

When a writer enters a correspondence into the PEPC system, he has an opportunity to provide information about himself. He can give his name and address and also disclose ties to a particular organization if he so chooses. The author can provide the name of the organization and the type of organization. For instance, if he is writing on behalf of himself, he would leave the name of the organization blank and he would select “Unaffiliated Individual” for the organization type. On the other hand, if he were writing as the official representative for the State of Hawaii, he would write “State of Hawaii” as the organization name and “State Government” as the organization type. However, there is always the chance that the writer misunderstands how to correctly input his information or that he purposefully inputs false information. The correspondences listed below are divided by organization type based on what the writer input in the PEPC system. There is the possibility that the information was input incorrectly.

FEDERAL GOVERNMENT

U.S. Fish and Wildlife Service– Correspondence # 16

TQ4-43893

STATE GOVERNMENT

History Colorado – Correspondence # 15

TQ1-43893, TQ4-43893

UNAFFILIATED INDIVIDUAL

14 correspondences were received from unaffiliated individuals.

SUMMARY OF CORRESPONDENCE

The following discussion is a compilation of representative quotes and overall summary of comments received from the public and organizations based on the four questions posed by the NPS in the Public Scoping Newsletter and Public Scoping Meetings.

Question 1: What issues should the NPS consider when evaluating the possible establishment of a semi-free ranging bison population? (Coded TQ1-43893)

Representative Quote:

“Impact fencing would have on other wildlife; such as antelope, deer, elk, etc. Habitat fragmentation, inside vs outside fenced areas. Cost of fence maintenance and disease protocols for prevention of contact between stock and wildlife (look at Yellowstone and its neighbors). How to dispose of surplus animals (look at other bison and wild horse issues). Carrying capacities for wildlife. Sustainability. Control/elimination of exotic plants.”

Question 2: What issues should the NPS consider when evaluating if and when management actions should be used to influence elk populations? (Coded TQ2-43893)

Representative Quote:

“This should be based on the establishment of a realistic carrying capacity of the habitat, with emphasis on the level of habitat destruction that can occur in a dry year. There should also be some studies done, in this unique habitat, to come up with a model of how elk and bison will share the same habitat and what sort of ideal balance could be determined for their relative numbers.”

Question 3: What management tools should the NPS consider for managing elk, bison, and other ungulates? (Coded TQ2-43893)

Representative Quote:

“I am opposed to bison introduction at this time. But if bison were introduced, I favor the use and permitting of hunters to cull animals and remove them for their own consumption. Hunting is also preferable for elk herd control. I do not want the GSDNPP to be turned into a bison (ranching) operation. I also do not want government sharpshooters (and or aerial gunning) to be the control mechanism. I do not think wolves are the solution to bison or elk control.”

Question 4: What other issues or opportunities should the NPS consider in this planning process? (Coded TQ2-43893)

Representative Quotes:

“Keep wildlife wild. Don't have bison in small enclosure for viewing. Reintroduce wild wolves.”

“The large herds of Elk have been a big tourist draw to Rocky Mountain National Park. Bison and Elk herds down at Sand Dunes would also draw tourists, and their dollars to the local economies.”

“Open the north end of the GSDNPP, where elk now concentrate, to bow, muzzleloader and rifle hunting during the various or selective seasons. You have an elk herd that is beyond the capacity. Impacts to vegetation and riparian are already occurring in nearby Deadman Creek drainage where willows on the National Forest

have been grazed beyond allowable uses because of high elk populations. Hunters would help trim the herd, disperse the herd, and pay for the privilege to do so. This requires some management on your part, but could save taxpayers thousands of dollars. It would actually make money and create jobs for the State, outfitters, and related services, which are very important in this economy. The elk resource could be used to feed many and would help restore their numbers in better balance with soil and vegetation resources. You would not need to hire government sharpshooters to cull the herd. The Baca NWR would also need to consider allowing public hunting access so that animals do not just run to the next haven.”

Concerns by Category:

Respondents indicated concern about movement of bison outside of the Park boundaries related both to the potential negative impacts to private land and potential positive impacts to/from the use of surrounding public lands. Nine respondents indicated concern over this issue.

Respondents indicated concern over controlling the herd size (elk and bison) ranging from predation, hunting, and immunocontraception. Eight respondents indicated concern over this issue.

Respondents indicated concern about the landscape’s carrying capacity to support a bison herd ranging from abundance of food source to control of exotic species. Seven respondents indicated concern over this issue.

Respondents indicated interest in the potential opportunities for public education and involvement. Six respondents indicated concern over this issue.

Respondents indicated concern about the fencing, or containment in general, ranging from impact to other wildlife species, potential for spread of disease, maintenance of fencing, and effectiveness of containment measures. Five respondents indicated concern over this issue.

Respondents indicated concern about the overall cost of establishment of a semi-free ranging bison population ranging from the cost to maintain the fencing, restoration of the landscape, management of the herd and the public accordingly, and increased staffing. Five respondents indicated concern over this issue.

Respondents indicated concerns over the protection of cultural resources and initiation of the Section 106 process. Two respondents indicated concern over this issue.

REFERENCES

U.S. Department of the Interior National Parks Service. (2001). Director's Order #12: Handbook for Environmental Impact Analysis, Section 4.6A. <http://home.nps.gov/applications/npspolicy/DOrders.cfm>