

Draft GMP/EIS Public Comments

<i>Comment ID</i> 2000		<i>Name</i> Barbara P. Carpenter			<i>Mailing List</i>
<i>Mailing Information Comments</i>		<i>Organization Name</i> Trailwise Back Country Horsemen			<i>Local</i> L
<i>Comment Legistics Comments</i> PEPC Correspondence (185267)		<i>Street Address</i> 14443 Hwy 160	<i>City</i> Del Norte	<i>State</i> CO	<i>Zip</i> 81132
<i>Author Type</i> Organization	<i>Comment Type</i> web comment form	<i>Telephone#</i>	<i>Email</i> vistatr@amigo.net		
<i>Comment</i> Historically horses have been used in the area that is now the Great Sand Dunes National Park. We do not want to loose this privilege. The parking for horse trailers is a problem. Is there any way we can improve the access and room to maneuver rigs? The "Point of No Return" is pretty inaccessible for horse trailers and seems to be a problem in the making for someone who gets in there and then gets stuck in the sand. The Mosca Pass trailhead creates a problem in that when you pull in and there are cars, you must back out! This is not only hard to do it is very dangerous. Could the parking lot at the amphitheatre be enlarged? Then instead of leading horses up the Mosca pass trail riders could utilize an alternate route and not be forced to back out of the parking area. I feel the riding users are willing to help with these problems if given some alternatives, input, and means to help. Respectfully, Barb Carpenter					

Comment ID
2001

Mailing Information Comments

Comment Legistics Comments

PEPC Correspondence (185173)

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Comment

As owners of Baca Grande Grants lots 102, 103, & 104 along Wagon Wheel Rd, my wife and I prefer that there be no access to the park that generates traffic along Wagon Wheel Road. Although we suspect such access would generate minimal traffic at this time, there are no guarantees that traffic would remain at a minimal level in the future. Thank you for considering our comments.

Comment ID**2002*****Mailing Information Comments******Comment Legistics Comments***

PEPC Correspondence (184887)

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Individual

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web comment form

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Chance N. Finegan

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Comment

I support the National Park Service Preferred Alternative. This alternative strikes a fair balance between sustainable development and wilderness designation. While I believe that wilderness is at the heart of the National Park Service, sustainable development has a place in America's national parks as well. This alternative does an admirable job of reaching a compromise between these two principles. Therefore, I support the National Park Service Preferred Alternative.

Comment ID**2003****Mailing Information Comments****Comment Logistics Comments**

PEPC Correspondence (184842)

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Organization

Comment Type

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Name

John M. Malville

Organization Name

Crestone Baca Land Trust

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Mailing List**Local**

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Comment

The Board of Directors of the Crestone Baca Land Trust wishes to present our scientific objections to a northern vehicular entrance to the Great Sand Dunes National Park that crosses the Baca Grande or the adjacent lands of the Baca National Wildlife Refuge, as is envisioned in the NPS Preferred Alternative. We assert that from a biological perspective vehicular traffic into the Park along Liberty Road or entering Cow Camp Road from the north should be avoided. For the past six years the Land Trust has been active in preserving open space and protecting the natural landscape of the Baca Grande. We have been particularly concerned about maintaining viable wildlife corridors connecting the valley floor with the high meadows. One of our goals has been to prevent the creation of additional barriers to the movement of animals along these east-west corridors by discouraging inappropriate development. Heavy vehicular traffic along a north-south road into the Park that cuts across corridors such as Cottonwood Creek could produce significant ecological damage. With a grant from the Colorado Division of Wildlife we have completed a biological survey of the Baca by the Colorado Natural Heritage Program. The surveys indicate that the southwestern areas of the Baca Grande still retain a remarkable biological integrity, which could be destroyed by poorly planned development and increased vehicular traffic. We have been particularly concerned over the health of the wetlands that we share with the National Wildlife Refuge. An access route along Camino del Rey, for instance, with heavy vehicular traffic crossing the Spanish Creek wetlands could have devastating environmental consequences in terms of wildlife disruption and water pollution. The pond that usually forms during summer months at the crossing of Camino del Rey and Spanish Creek is a remarkably rich biological habitat, with Brazilian free-tailed bats, tiger salamanders, chorus frogs, Mountain Plover, Wilson Phalaropes, and the San Luis Valley subspecies of the northern pocket gopher. Judging from algae bloom in the waters, the wetland is already polluted, probably by up-stream septic systems, and we wish to prevent increased pollution. The CNHP biologists discourage development within or immediately adjacent to this wetland. The biological significance represented by some areas of the Baca Grande may also warrant designation as "Potential Conservation Areas" by the Colorado Natural Heritage Program. For example, the Montane Riparian Forests (*Populus angustifolium* - *Juniperus scopulorum*) along both Willow and Spanish Creeks represent good (B-rank) examples of a vulnerable (G3S3) plant community. From an ecological viewpoint, we recommend that vehicular entry to the Great Sand Dunes through the Baca Grande and its south-eastern gate should be approached with great caution. Sincerely, J.McKim Malville, PhD, Director and President For the officers and directors of the Crestone Baca Land Trust: Ken Foelske, Director; Anne Silver, Secretary; Forrest Ketchen, PhD, Director and Co-Secretary; Katie Getchell, Director; Joanne Kiser, Director; Jillian Klari, Director; Bill Sutherland, MD, PhD, Director

Comment ID**2004*****Name***

B. Sachau

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Comment

Great Sand Dunes National Park Colorado: National Park owned by national taxpayers, not owned by local profiteers seeking to decimate the park. I oppose new visitor impact to this park. I oppose more inroads for visitors. I feel the park needs to be preserved for wildlife and birds. People already have developed 95% of America. Save what little is left. Don't let crooked Washington lobbying bureaucrats tell you to decimate it for money and greed. The present Washington administration has a slash and burn policy for our parks which is all wrong for America. America has long wanted to protect lands for our children. The slash and burn policy is all wrong. PG12 - ban all hunting and trapping. Ban all cattle grazing which is environmental suicide, causing erosion and loss of native plants. Ban all prescribed burning, which releases fine particulate matter which can drift thousands of miles killing Americans through lung cancer, heart attacks, strokes, pneumonia, asthma, and allergies. Close some roads and construct zero new ones. Stop setting American parks awash in toxic pesticides, which can travel on air and decimate vegetation in an area thousands of miles away.

Comment ID
2005

Mailing Information Comments

Comment Legistics Comments

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Comment

As a resident of Saguache county, I wanted to offer my support IN FAVOR of the North access road, going into the Great Sand Dunes. Thank you for reading.

Comment ID
2006

Mailing Information Comments

Comment Legistics Comments

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Comment

Dear Sirs: I wish to be counted in favor of the plan presently favored by the park service for the Sand Dunes National Park and Preserve. I believe the park service has been diligent in consulting with all entities in the San Luis Valley to develop this plan. Thank you very much.

Comment ID
2007

Mailing Information Comments

Comment Legistics Comments

Author Type
Organization

Comment Type
formal letter

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Roland E. Johnson, Governor

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Comment

The Pueblo of Laguna appreciates your consideration of possible interest your project may have on traditional religious or cultural properties. At this time Laguna Pueblo has determined that the proposed undertaking WILL NOT have an affect at this time, but in the event that any new archaeological sites are discovered and any items are recovered, we would like to be notified to review items.

Comment ID**2008****Mailing Information Comments****Comment Legistics Comments****Author Type**

Organization

Comment Type

formal letter

Comment

Thank you for your recent correspondence dated April 14, 2006 (received by our office on April 17) regarding the project noted above. Previous correspondence with your agency has indicated your office's intent to use the NEPA process and documentation to comply with the requirements of Section 106 of the National Historic Preservation Act (NHPA) as stipulated in 36 CFR 800.8(c) (NPS letter dated January 5, 2005).

It is our opinion that an important step in managing the cultural resources of the Great Sand Dunes National Park and Preserve (GSDNPP) is identifying the presence and nature of those resources. While the draft plan/EIS provides much information in this regard, as noted in numerous places in the document (for example, on page 211 with regard to the NPS preferred alternative) much of the park has not been surveyed for historic properties because it has until recently been privately owned. As a result, the full extent and nature of the historic properties located within the GSDNPP and the effect of the undertaking on them remains unknown. Consequently, the draft EIS fails to meet the requirements of Section 106 of the NHPA, as stipulated in 36 CFR 800.8(c) (1)(ii) which states that the agency official shall "identify historic properties and assess the effects of the undertaking on such properties in a manner consistent with the standards and criteria set forth in Sections 800.4 and 800.5", and the requirements of Section 110 of the NHPA, specifically Section 110 (a)(2)(A) which states "that historic properties under the jurisdiction or control of the agency, are identified, evaluated, and nominated to the National Register". Please note that addressing the identification and evaluation of historic properties within the GSDNPP in a proactive manner with regard to Section 110 allows for a more effective and streamlined approach to meeting the requirements of your Section 106 responsibilities when undertakings within the GSDNPP are planned.

In addition, we look forward to consulting with you regarding "measures that might avoid, minimize or mitigate any adverse effects of the undertaking on historic properties", as stipulated in 36 CFR 800.8(c)(1)(v). Presently, general and specific project actions with the potential to affect known historic properties are described in various locations in the document (for example, on pages 211-214 with regard to the NPS preferred alternative); as the full extent and nature of historic properties within the area of potential effect (APE) has yet to be identified such actions have the potential to affect additional historic properties.

With regard to Table 27 ("Compliance with Section 106 of the National Historic Preservation Act") on page 304, our office has the following comments:

Construction of new bikes lanes along and a new fee booth near the park entrance road are described as not having an "adverse effect on a historic property and therefore would not require consultation with the Colorado SHPO". On the contrary, it is our opinion that such undertakings have the potential to affect historic properties. Identification of the area of potential effect (APE) for these undertakings, determination of the presence or absence of historic properties within the APE, and determination of the effect (whether adverse or not) of the undertaking on such resources if present therefore should occur in consultation with our office. Unless we enter into a Programmatic Agreement with your office, our office should be consulted at each step within the Section 106 process. Section 106 provides for consultation with our office regarding each undertaking, beginning with the scoping process through the final project decision (see 36 CFR 800.16(f)).

Four additional actions in the table are described as having the "potential to adversely affect a potentially eligible historic property and therefore would require consultation with Colorado SHPO [but] if it is determined that a resource is not eligible, consultation would not be required for that resource." As noted above, identification and evaluation of historic properties and evaluation of effect must occur in consultation with SHPO.

Thank you for the opportunity to comment on this project, If we may be of further assistance please contact Greg Wolff, Section 106 Compliance Coordinator for Archaeology, at (303) 866-4674 and/or Amy Pallante, Section 106 Compliance Coordinator for Architecture, at (303) 866-4678.

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Georgianna Contiguglia

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Comment ID**2009*****Mailing Information Comments******Comment Legistics Comments******Author Type***

Organization

Comment Type

formal letter

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Saguache

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Comment

To Whom It May Concern:

The Board of County Commissioners met on May 16, 2006. The New Preferred Management Plan and the addition of the New Wilderness Area were discussed.

At this time we would like to let you know that the Saguache County Board of Commissioners is in unanimous support of the National Park Preferred Management Plan, which includes the addition of the New Wilderness Area.

We appreciate all of the work and effort that has gone into this process. Saguache County is very proud of the fact that we are the home of this beautiful new National Park.

Sincerely, Mike Spearman (Chairman), Sam Pace (Commissioner), Joe Alexander (Commissioner)

Comment ID

2010

Mailing Information Comments

Comment Legistics Comments

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Organization

Comment Type

formal letter

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This letter is regarding the Draft General Management Plan / Wilderness Study / Environmental Impact Statement for the Great Sand Dunes National Park and Preserve.

The Foundation for North American Wild Sheep (FNAWS) is in support of the National Park Service preferred alternative plan.

However, there are always concerns — as more of the Park is proposed / converted to wilderness status, will the existing man-made water sources be removed? If natural water sources (especially at higher elevations) are unavailable for wildlife, we recommend keeping the man-made water sources in place. These water sources, as opposed to being artificial are merely “water-replacements.” These “water-replacements” are needed due to increased demand for human uses resulting in the reduction of available surface water.

By monitoring the use of the “water-replacements” by wildlife will help determine whether the water sources should be removed, or if heavily used by wildlife may inform the Park that additional water-sources may be needed to better distribute these animals.

FNAWS looks forward to working in partnership with you to ensure the future of all wildlife.

Comment ID**2011*****Name***

Mark Belles

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Individual

Comment Type

formal letter

Telephone#***Email******Comment***

Thank you for the CD of the Draft General management Plan I Wilderness Study / Environmental Impact Statement for Great Sand Dunes National Park and Preserve. Please retain my name on the mailing list for this process.

I agree with the National Park Service's Preferred Alternative for the following reasons.

I support the designation of nearly all lands that possess wilderness characteristics as defined by the plan. I encourage the park Service to designate these lands as Wilderness Study Areas during the period after recommendation to congress and prior to congressional action. These recommended lands should be managed as wilderness areas while congress deliberate on their future status.

I agree with the backcountry adventure concept and especially like to ideas of using currently impacted lands (an abandoned drill pad) as trail head parking. This is consistent with Leave No Trace philosophies of minimizing or avoiding impacts on previously unimpacted lands and concentrating necessary impacts to small zones.

Thank you for the opportunity to comment on the plan. I am a regular visitor to the Great Sand Dunes. As a Scoutmaster I have brought several contingents of Boy Scouts to hike the dunes of the years. It is reassuring to know they are going to be well cared for.

Comment ID
2012

Mailing Information Comments

Comment Legistics Comments

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Comment Type
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Comment

I am a resident of the Boca Grand Subdivision adjacent to the new Great Sand Dunes National Park and Preserve. This letter registers my support for designating an additional 50,951 acres as Wilderness as explained in Appendix G of the Draft - General Management Plan / Wilderness Study / Environmental Impact Statement.

Comment ID**2013****Mailing Information Comments****Name**

Mark A. Swinney

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L

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Individual

Comment Type

formal letter

Telephone#**Email****Comment**

I will be repeating what I previously commented on concerning the Great Sand Dunes planning process. I have reviewed all of the alternatives. As I understand the alternatives, none of them include motorized access to the Rio Grande National Forest lands acquired through the Baca purchase. Unlike the Park Service, the National Forests lands are multiple use lands. The Rio Grande National Forest will have to complete a Forest Plan amendment for the additional acres/lands from the Baca. Without motorized access to at the very least a public parking area, the full extent of potential multiple use cannot be developed and evaluated. I would question the ability of the Rio Grande national Forest to even manage the Forest for healthy conditions (a situation not an issue for the Park Service) with the access proposed in these alternatives. In fact, the alternatives developed ignored in total the public's demand for motorized access to this piece of Forest Service land. I'm not promoting motorized access all over everywhere in the Forest on the lands in question. However, motorized access to the additional lands at least at one location should be authorized. Otherwise, the additional Forest lands become defacto Park lands and as such might just as well be Park Service under Park Service management. The design of roads that go within 250 feet of the National Forest boundary and then stop is an obvious hold over the National forest by the Park Service that the FS decided to take the action the Park wants or the Park will not authorize the additional 250 feet of the road access to the Forest lands. Strange this was not mentioned during legislative processes. I supported the Baca purchase and the split seemed reasonable, that support would not have existed had this information been available, as I am sure many others would agree. It would appear that the Park Service deliberately kept these ideas away from the public during that process. Subsequently during the planning process this issue has been totally ignored as many of the public have brought it to the Park's attention. The other hope was that the US Fish and Wildlife Service would cooperate so that extensive hunting and use of their acquired lands could be added to those of the USFS. The USFWS indicates that it could be 10 years or more before their planning even begins. This means that dependence on assistance in this area will not be available from that agency. This situation ignores the high numbers and continual increase in the elk herd in this area. Should this high level of winter grazing continue on the Park they just get what they wanted and ignore the health of the Park as being expedient. This is a normal mode for the Park Service nation wide. For the Park Service to contribute to this situation by sticking their heads in the sand at the very least is not being a good neighbor for the Forest lands which cannot maintain these high levels of summer use by this elk herd, and high elk use on private lands, and the potential impacts to the bighorn sheep her.

This direction by limiting motorized access GREATLY reduces the National Forest's ability to provide multiple use activities, many kinds of recreation normally permitted on Forest lands, the ability to work with CDOW to reduce the summering elk herd on Forest lands, and the issues with the bighorn sheep herd health and population.

Comment ID**2014****Mailing Information Comments****Comment Legistics Comments****Author Type**

Individual

Comment Type

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Comment

I have a personal and professional interest in the future management of Great Sand Dunes. On the personal side, my family and I have visited Sand Dunes almost every year since the mid-1950's in all seasons except the dead of winter. We have hiked the trails, climbed the dunes and backpacked to the backcountry. The scenery, wildlife and unique ecology are unparalleled in Colorado, the west and perhaps the world.

On the professional side, my organization the Upper Arkansas and South Platte Project is concerned with protecting and preserving biodiversity, wild lands and connecting habitat linkages in our watersheds and beyond. Our Wild Connections Conservation Plan includes recommendations for additions to the Sangre de Cristo Wilderness and Research Natural Areas in the San Isabel National Forest, and we support proposals on the west side of the range that will contribute to the protection of Wilderness. We are interested in helping create the largest possible core reserves, connected by wildlife linkages, to accommodate wide-ranging animals, protect biodiversity and provide appropriate low intensity back country recreation.

The proposal in your draft management plan's preferred alternative to add nearly 51,000 acres of wilderness to Great Sand Dunes National Park and Preserve. Wilderness is a future oriented measure that will significantly expand the current protection on the Sangre de Cristo range. I fully support this Wilderness designation.

In addition, Wilderness designation will help protect the park's oldest archaeological sites, its endemic species, overall wildlife habitat and the natural cyclical processes that are needed to maintain the dunes themselves. In an era of increasing recreation that is dependent on motors, it is necessary to set aside large areas where people, both today and in the future, can experience solitude, quiet, self-reliance and the nurture of spirit that comes best by getting into a wild area. And if we are to preserve our important native species, especially larger mammals and rare and endangered species, we must have areas that provide habitat for their entire life history needs, security from human caused impacts, and linkages for seasonal migrations and dispersal of young animals.

Great Sand Dunes today is one of the best managed parks to accommodate a modest level of developed camping. An expansive level of backcountry experiences and, with the adjacent National Forests and Nature Conservancy lands, an impressive array of ecosystems and wildlife habitat - adding additional Wilderness will enhance this feature.

In addition: I strongly urge the addition of sand sheet lands in the northwest corner of the park to your wilderness proposal. Only one gravel road separates them from other deserving wilderness. Wilderness protection becomes increasingly important given that you propose this area as a backcountry access zone: please recommend wilderness protection for lands not slated for access roads and parking lots if such structures are necessary.

Wilderness-quality lands surrounding Medano Ranch, excluding ranch buildings, the administrative access road and the Closed Basin water Project facilities, should also be added to the plan's proposed Wilderness areas. The sabhka, a fundamental park resource, is underrepresented in the wilderness proposal, and unimproved two-track roads should not disqualify these lands.

One of the more endearing aspects of camping at Sand Dunes is the absence of electrical and water hookups at individual campsites. I strongly urge that this style of campground be maintained! For those who need such services, commercial enterprises outside the park are available and can grow to accommodate increased requests. In addition, the concentration of visitor services in current locations is desirable, and the back country should be reserved for foot and horse travel.

Roads and parking lots within the park should be kept at an absolute minimum for safety and reasonable access. Any new motorized access should be located outside the park on existing roads through cooperative agreements with other governmental agencies and relevant entities. Trails and visitor use should be directed away from sensitive riparian zones, and if jeep use is to be continued on the Medano Pass road, cooperative work with the National Forest may be needed to reduce the impact of stream crossings. In general, motorized and mechanized travel is entirely inappropriate for the back country, and of course would be prohibited in the Wilderness area.

Restricted access to the park's archaeological sites is imperative and archaeological surveys on all park lands should be conducted as soon as possible. It is important to expedite the purchase of subsurface mineral rights to protect the park from energy-related intrusions.

Finally, I want to commend your staff on the excellent interpretive programs at the visitor center, on hikes, and at the amphitheatre. For many people, this exposure to good science, the value of wilderness, and the unique features of Sand Dunes, is an experience they will treasure for years. I have always appreciated the professionalism, tempered by adjusting to the audience, of your staff. Thank you for this opportunity to comment.

Comment ID**2015****Name**

Jesse Jones

Mailing List**Mailing Information Comments****Organization Name****Local**

O of S

Comment Legistics Comments

Remaining comments follow WS Form Letter

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Comment

Howdy, I grew up in Colorado and visited the Great Sand Dunes National Monument when I was a kid. At that time, I wasn't particularly interested in the area surrounding the dunes. I wanted to go play in the big sandbox. However, I couldn't help noticing the fragility of the ecosystem where the campground was located. These arid environment ecosystems are easily damaged and very slow to recover.

Damage can occur in the blink of an eye, during fire suppression by Forest Service crews, when a lazy seasonal employee prefers to drive rather than walk, etc.. Wilderness protection sets clear boundaries and clear rules, protecting fragile areas. I commend the park service for developing a preferred alternative that includes protection of 51,000 ac of wilderness in the park. However, I would encourage you to provide this protection to more of the parks acres, places that should be protected from the damage that motorized vehicles can do.

Comment ID**2016****Mailing Information Comments****Name**

Marin Kress

Organization Name**Mailing List****Local**

O of S

Comment Legistics Comments

Comment encompasses WS Form Letter

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Comment

I believe that our National Parks system deserves strong protection and full-funding. While I know that federal funding can be difficult to secure, one thing we should not sacrifice due to lack of funds is the protection of our national treasures for generations to come. Not only our natural areas, but also the cultural and anthropological treasures within.

In order to maintain the needed level of protection, I favor restricted access to the sensitive archaeological sites in the Great Sand Dunes National Park and Preserve. In order to aid in that protection, I urge the Park Service to conduct archaeological surveys on all park lands as soon as possible. Also of importance is protection from energy exploration, which can lead to irreversible environmental degradation. Beacuse of the risk of this type of exploration and exploitation, I strongly urge you to expedite the purchase of subsurface mineral rights to protect the park from energy-related intrusions.

Overall I commend the proposal in your draft management plan's preferred alternative to add nearly 51,000 acres of wilderness to Great Sand Dunes National Park and Preserve. Wilderness will help protect the park's oldest archaeological sites, its endemic species and the renewal process for the very dunes for which the park is named.

Wilderness will also help ensure that future generations may continue to enjoy the park's solitude, quiet, and quite astonishing range of landforms and species.

But protection should not stop at the dunes, I strongly urge you to add sand sheet lands in the northwest corner of the park to your wilderness proposal. Only one gravel road separates them from other deserving wilderness. Wilderness protection becomes increasingly important given that you propose this area as a backcountry access zone: please recommend wilderness protection

for lands not slated for access roads and parking lots if such structures are necessary.

To the greatest extent possible, please minimize roads and parking lots within the park and try to locate new motorized access outside the park, primarily on existing roads, through cooperative agreements with other governmental agencies and relevant entities. Roads are clearly not a necessary part of a true backcountry area, they often increase illegal access as well. Please direct trails and visitor use away from sensitive riparian zones, such as the Deadman Creek corridor, and please recognize that motorized and mechanized travel are inappropriate in the park's backcountry.

Finally, I request that you also propose wilderness protection for wilderness-quality lands surrounding Medano Ranch. The sabhka, a fundamental park resource, is underrepresented in the wilderness proposal, and unimproved two-track roads should not disqualify these lands (those not occupied by ranch buildings, the administrative access road and Closed Basin Water Project facilities) from wilderness protection.

Thank you for considering my comments and adding them to your records.

Comment ID

2017

Mailing Information Comments

Comment Legistics Comments

multiple agencies supporting WS Form Letter: TWS, SanLuis Valley Ecosystem Council, Sinapu, CO Environmental

Author Type

Organization

Comment Type

formal letter

Name

Multiple Agencies

Organization Name

The Wilderness Society

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Mailing List

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Comment

Thank you for accepting comments on draft management plans for Great Sand Dunes National Park and Preserve. The awe-inspiring landscapes and unique biodiversity found in the park provide outstanding opportunities for exploration and inspiration. The National Park Service clearly recognizes the value of the park's pristine condition and the importance of protecting its natural processes, and the conservation community is honored to partner with the Park Service in preserving this special place.

The Wilderness Society (TWS) is a national not-for-profit membership organization devoted to preserving wilderness and wildlife; protecting America's forests, parks, rivers, and shore lands; and fostering an American land ethic. TWS has more than 204,000 members nationwide, including 6,300 members in Colorado. TWS members have a long-standing interest in the protection and management of our public lands and are concerned about the impacts of roads and development on Colorado's wildlands, including in national parks. TWS members use National Park Service lands for hunting, fishing, hiking, backpacking, photography, wildlife viewing, and other recreational, aesthetic, and educational purposes. TWS is a member of the Colorado Wilderness Network.

The Park Service has demonstrated its dedication to preserving wilderness values in the park and we commend the Park Service's decision to propose almost 51,000 acres of land for wilderness protection in its preferred management alternative. We would also like to commend the Park Service for its commitment to the purpose and values outlined for the park in the Great Sand Dunes National Park and Preserve Act of 2000, namely those of ensuring the preservation of the dunes, the larger ecoregion, and the unique natural processes, landscapes and biological communities in the park.

We agree with most management decisions in the preferred alternative, but encourage reconsideration of several points pertaining to backcountry access, wilderness boundaries and resource management, and we encourage the Park Service to take a more aggressive approach to land acquisition. Our support and concerns are outlined below.

A) Wilderness

i. Importance of wilderness protection for deserving park lands

Designating qualifying park lands as wilderness is the best way to fulfill the purpose of the park as defined in the legislation by which it was created. As described in the park's foundation for planning and management (9), The purpose of Great Sand Dunes National Park and Preserve is to: preserve spectacular and unique sand dunes and their high elevation watersheds and to perpetuate the entire system for the benefit and enjoyment of present and future generations provide long-term protection of the geological, hydrological, ecological, scenic, scientific, cultural, wilderness, educational, wildlife, and recreational resources of the area, including the sand deposits associated with the dune mass and the ground water system on which the sand dune and wetland systems depend, and the remarkable biodiversity evident in the landscape from the valley floor to the

mountain crest provide opportunities for visitors to experience, understand, enjoy, and gain a sense of stewardship for the park's natural and cultural resources facilitate research to support park management, and to promote scientific knowledge and education

Wilderness designation provides permanent protection for sensitive natural resources and wildlife, ensuring that the biodiversity and stunning scenery of the park would be enjoyed by park visitors for many years to come in the same pristine and wild state that exists today. Thus, wilderness designation for qualifying park lands will fulfill the park's goals of a perpetuating the entire system for the benefit and enjoyment of present and future generations, and providing long-term protection of the park's natural resources, natural processes and wildlife.

For this reason, the Park Service shows tremendous foresight in proposing protection for all the new park lands it has found to be eligible for wilderness designation.

Currently, the proposal includes most of the lands to the west of the dunes. Visitor use in the park is bound to increase, and, with wilderness protection for deserving lands, the park mission and purpose, in addition to its breathtaking views, would remain intact, and visitors would always be able to discover a unique wilderness experience, quiet and solitude, clear skies and stunning views when they visit the park.

We echo the Park Service's concerns about maintaining a wilderness experience in the dunes play area, and encourage them to be vigilant in prohibiting activities that may damage the dunes and degrade the wilderness experience, such as dune boarding.

a. Extending wilderness protection to the sand sheet would secure the preservation of an entire interdependent ecoregion.

The very dunes for which the park is named depend on the extension of wilderness protection to the surrounding sand sheet. This landscape is crucial to the dune system, as it is the immediate and major source of sand replenishment for the dunes. (Medano and Mosca Creek recycle sand by carrying it from the sides of the dunes to the sand sheet where it is stored and swept back into the dunefield by winds from the southwest.) The sand sheet is stabilized by a very sensitive layer of vegetation (grasses and other low-growing plant life). Wilderness protection is necessary to providing the level of consideration that this sensitive ecological area requires. It is important to the survival of the dunes that this vegetation is never disturbed by development, motorized vehicles or other damaging human intrusions.

The Great Sand Dunes National Monument was expanded in 2000 in order to protect the entire system that sustains the dunes, from the high peaks to the sand sheet to the large aquifer beneath. The act of Congress that created the park requires the preservation of the entire system, and long-term protection for the remarkable biodiversity evident in the landscape from the valley floor to the mountain crest. (cite GSD NP&P Act) Extended wilderness protection throughout the park will fulfill the park's mission and purpose.

b. Wilderness would protect wildlife habitat

Many other park values are upheld through wilderness protection, especially that of wildlife diversity. The diversity of wildlife in the park is astonishing, and it is due to the unprecedented proximity of several distinct life zones, including the sand sheet and sabhka lands. Wilderness designation will prevent the establishment of new roads and development on these sensitive lands. By protecting the park land from the mark of humans, the unique habitat that the park provides to its endemic and native species will be preserved.

The sand sheet lands in the park support at least six endemic species, among them the Great Sand Dunes tiger beetle, in addition to elk, black bear and pronghorn antelope.

[MORE ABOUT ENDEMIC SPECIES OF THE SAND SHEET FROM CNE]

c. Wilderness would preserve fundamental visitor opportunities.

The recreational opportunities in the park depend on the health of the entire park ecosystem. Permanent protection for mountain streams and the expansive sand sheet will preserve fundamental visitor opportunities in the park, including: climbing and descending the high dunes because the dunes will be sustained by the permanent protection provided to the supporting landscape and natural processes; experiencing surge flow, playing in Medano Creek because the large aquifer that supports the hydrologic system in the park (located under the sand sheet and sabhka) will be protected from development and intrusion of human impact; seeing the heavens because there will be no intrusive development in the park; viewing the dunemass from the mountains because the view shed, the sandsheet and sabhka, will be maintained as natural and wild; seeing wildlife in its natural setting because habitat for elk, pronghorn and mule deer will be preserved; and experiencing quiet, solitude, isolation in a wilderness environment because it is this experience that wilderness designation aims to serve (Great Sand Dunes National Park and Preserve, Fundamental Resources and Values, 13). Most importantly, wilderness designation will preserve these opportunities and values forever.

d. Wilderness would help protect cultural resources.

Wilderness designation for park lands will help protect archaeological resources and specific sites from disturbance. Wilderness prevents the establishment of roads that would lead artifact poachers and insensitive visitors to cultural sites.

Much of the new park lands and proposed wilderness lands have not been surveyed for archaeological resources but it is highly likely that there are many undiscovered sites of cultural significance. Wilderness would ensure that these yet undiscovered sites are not disturbed by roads, and would help protect them from illegal motorized use, while preserving opportunities for continued scientific research and discovery.

We encourage the Park Service to survey all lands before proposing the designation of roads or other facilities. The more that is inventoried, the more the Park Service can educate the public. The more information collected, the better the Park Service will be able to protect the park's sensitive natural and cultural resources. All areas where there may be potential development or continued use should be prioritized for inventory.

ii. Expand the wilderness boundary.

While we fully support the Park Service's recommendation in its preferred alternative to expand wilderness protection to nearly 51,000 park acres for all the reasons listed above, we urge the Park Service to expand the boundaries of its wilderness recommendation in two locations. The Park Service should include in its wilderness recommendation lands in the northwest corner of the park and lands surrounding Medano Ranch in the southwest corner for wilderness protection. We believe these lands to have wilderness characteristics and any barriers to their designation as wilderness to be negligible or negotiable.

We commend the Park Service for officially recognizing the Deadman Creek potential conservation site and Sand Luis Lakes/Sand Creek potential conservation site as ecologically critical areas and we encourage the Park Service to pursue the most stringent protection for the valuable resources found in these sites. We are concerned that neither site is proposed for wilderness protection in its entirety.

a. Extend wilderness to northern boundary in northwest corner of park

The Park Service's wilderness recommendations should be expanded to include the northwest corner of the park in the vicinity of Cow Camp Road. These lands exhibit the same wilderness qualities as park lands south of Cow Camp Road and deserve the same protection.

Cow Camp Road can be rehabilitated or cherry-stemmed, but it should not preclude lands to the north from wilderness protection, even though, as the Park Service notes (page?), they constitute less than 5,000 acres. Such an area of land can be designated as wilderness if it can be easily managed as wilderness. Indeed, wilderness protection for the lands north of Cow Camp Road will provide management continuity for the park. Plus, Cow Camp Road is not a definitive boundary and is not uniform in its structure: It may start as an improved road, but the end fades out and is, indeed, unimproved.

Any lands not deemed necessary for providing motorized access (pending the Park Service's decision on where to best locate motorized access to park lands) should be designated for inclusion in the wilderness proposal and re-zoned, in the interim, as backcountry adventure. Certainly, until access points are located, this land should be managed as wilderness, the road gated and kept closed.

Any lands near Deadman Creek riparian corridor, an ecologically critical site (99) in the park and potential conservation site (99-100), should be protected from motorized travel "and even from visitor use and travel by foot or by horse" to the best of the Park Service's ability. Amazing biodiversity is being discovered around Deadman Creek. There are few places in the southwest as rich in biodiversity as this area. Also recently uncovered nearby are world-class archaeological sites, suggesting that there are many yet-undiscovered sites in the area which should be protected from motorized use and establishment of new, informal motorized routes.

Backcountry Adventure zoning, although compatible with wilderness protection, does not provide adequate permanent protection for these important backcountry lands. The land zoned Backcountry Access should be changed to Backcountry Adventure when the specific locations of access roads and parking lots have been determined in order to protect the remaining wilderness-quality lands. The Park Service should plan to propose all potential Backcountry Adventure lands in this area for wilderness
protection.

b. Extend wilderness to southern and western boundary in southwest corner of park

Please also extend your wilderness proposal to include all lands zoned by the Park Service as Natural/Wild. These lands have been recognized by the Park Service as having wilderness qualities. Extending the proposal to the Natural/Wild lands around Medano Ranch would provide permanent protection for extended sections of Big Spring

and Little Spring creeks, the San Luis Lakes/Sand Creek potential conservation site (101), the sabhka (92) and its unique wetlands and wildlife.

The Park Service has recognized that these lands are part of the ecologically critical San Luis Lakes/Sand Creek potential conservation site (101). Protection of sabhka, a fundamental park resource, and its unique wetlands and wildlife is important to preserving the entire system and biodiversity in the park (92). The Park Service should propose this area for wilderness protection.

The sabhka, a fragile plain formed when sand is cemented together with minerals that seasonal wetlands have left behind, is an important life zone mostly left out of the proposed wilderness in the Park Service's preferred alternative. Highly alkaline, it is hospitable to only the most resilient species, yet an amazing diversity of wildlife can be found there and animal tracks decorate the ground. The Park Service recognizes the sabhka as a unique and important park resource (fundamental resource?), please provide greater protection for this unique ecosystem.

Please expand proposed wilderness boundaries to standard buffer distances from Closed Basin Project infrastructure, historic buildings and main administrative access road.

A closer, more accurate boundary will prevent two-track routes from proliferating and help preserve park values. In reference to other structures in the Medano Ranch area, power lines can be placed underground and feeding structures for buffalo can be removed or minimized. Much of the existing infrastructure can be rehabilitated.

Four-wheel drive routes should not disqualify this area from wilderness protection. Indeed, the Park Service should plan to rehabilitate those routes. Although they are zoned administrative and proposed for only limited public access, the routes still pose a threat to nearby archaeological resources and sensitive ecological sites. [see section below: Limit administratively-zoned routes at Medano Ranch]

Here are standard wilderness setbacks for Colorado legislation. Please extend your proposed wilderness boundaries to reflect these buffer zones. The buffer from a trail should be 50 feet from the trail centerline; the total non-wilderness width of a cherry stem trail should be 75 feet. The buffer from a road should be 100 feet from the road centerline; total non-wilderness width of a road cherry stem should be 150 feet. For a private property line or from a specified right-of-way, the wilderness boundary should be the property line or right-of-way edge itself.

iii. Wildlife management concerns: elk management

The Great Sand Dunes Park and Preserve provides habitat for a large herd of Rocky Mountain elk. The elk herd is a great attraction for visitors to the park, but there are concerns that the herd size may eventually compromise the ecological balance and integrity of the park ecosystem, putting stress on local big horn sheep and pronghorn populations. As hunting is not generally allowed in national parks, managing herd size in the Great Sand Dunes National Park may prove challenging. In general, we support efforts to restore herd populations to what would be expected under natural (historical) conditions, and we support using natural mechanisms for management whenever possible.

Concerns about the limited flexibility of elk management in a wilderness area are understandable, but easily addressed. Wilderness protection proposed for the habitat of the elk, big horn sheep and pronghorn in the park would provide guidelines for addressing the problem of an over-abundant elk population. The minimum tool requirement guides land managers to determine which approach would have the least effect on the habitat which they are trying to preserve. The tool that is used should be that with the least discernible impact on the land. Wilderness protection would not prohibit land managers from completing necessary wildlife management tasks, it only directs them to analyze various mechanisms for the job. The rule can be flexible and could allow for motorized use in unique, emergency situations.

If the collaborative three-year elk study proves that the elk population must be reduced, we urge the Park Service to champion the use of natural predators in the park. We think the reintroduction of either Mexican or Grey wolves, or both, to the area may be the most fiscally and ecologically viable approach in the long run, as evidenced in the success of wolf reintroduction in Yellowstone National Park (citation?). Perpetual wildlife management efforts like hazing the herd out of the park and quick fixes such as nocturnal sharp shooting alone do not provide sustainable, ecologically-beneficial, long-term solutions as would the restoration of natural predators. As the restoration of wolves in Yellowstone National Park has aptly illustrated, wolves are also a huge attraction to visitors and may result in ecological restoration reaching far beyond merely the reduction of elk numbers. (citation?)

Other tools for elk management in wilderness include sharp shooting, lethal injection, fertility control agent, and hazing, or driving the herd out of the park, by horseback. We encourage the Park Service to collaborate with other government agencies to determine the best solution for elk management, one that preserves the natural state of

park resources and restores a herd that can be sustained under natural conditions without disturbing other park resources or wildlife. We concur with the Park Service's assessment of the minimum tool requirement for elk and grazing issues and we appreciate that the Park Service is aware of the responsibilities of wilderness management. It is important to be diligent and consistent in applying this rule.

iv. Potential new wilderness in National Forest land would complement the park

The Rio Grande National Forest received an additional 13,502 acres of mountain tract as part of the Great Sand Dunes National Park and Preserve Legislation of 2000. We will highly recommend that the Forest Service propose these lands for wilderness protection to complement the management practices of the Great Sand Dunes National Park and Preserve.

B) Backcountry Access

i. Public motorized access should be primarily provided on established roads outside the park

While we support the Park Service's efforts to provide hikers, hunters, backpackers and horseback riders with better access to the park's backcountry territory, we urge the Park Service to protect visitor experience of quiet and solitude in the park by locating vehicle access primarily outside the park boundary. Where possible, the Park Service should locate access roads where roads already exist outside the park boundary, while retaining control of all motorized access points at the park boundaries. Parking lots, if necessary, should also be located beyond the park boundary.

Adequate motorized access should be available to park visitors and those who want to experience the pristine backcountry lands. That said, in order to best preserve the visitor experience and natural resources, motorized access should be carefully managed. The best way to ensure preservation of the park's fundamental resources and visitor opportunities is to keep motorized access on the park perimeter, where it is more apt to benefit local communities and for the continuity of management practices. There should be no new roads built inside the park, and all two-track or unimproved routes should only be zoned for motorized use after a careful and thorough survey of park resources, ecological and cultural, that may be affected. Public motorized access inside the park should take place only on select existing improved roads. Unnecessary routes and roads should be closed and reclaimed. Until access sites are officially determined, emphasis should be placed on preservation of resources in the area. We agree with all access decisions in the Park Service's preferred alternative with the exception of backcountry access designation for Cow Camp Road, and administrative access designations for unnecessary four-wheel drive roads in lands with wilderness qualities deemed Natural/Wild near Medano Ranch. We support administrative access designation for Liberty Road, but encourage the Park Service to gate and close the road beyond its first quarter mile south of the park boundary.

We encourage the Park Service to collaborate with other agencies (National Forest Service and U.S. Fish and Wildlife Service) as well as other relevant entities (Baca Grande Subdivision) to try to locate motorized access outside the park on established roads such as Camino Real and the section of Liberty Road north of the park boundary. The Park Service should retain control of all motorized access points at the park boundaries.

We also encourage the Park Service to address backcountry access issues in greater detail in the management plan. While we support a collaborative process, we are concerned that putting off these access decisions and deferring to other public land agencies is not in the Park Service's best interest because these decisions will so clearly impact National Park Service lands. The Park Service should identify the options that would most benefit the park.

ii. End use of Cow Camp Road

We encourage the Park Service to end motorized use of Cow Camp Road. This road comes too close to sensitive ecological areas, such as Deadman Creek, to accommodate increased motorized traffic. Also, there has been no archaeological survey of the area, so it would be imprudent to allow increased or sustained motor vehicle

access in an area where the sensitivity of resources is unknown. Currently, Cow Camp Road is open for administrative access. In the interim it should be gated and closed to prevent establishing an expectation of use. In the management plan the road should, at the very least, be closed to the public and there should be no increase of traffic.

Discontinued motorized use is most important for the eastern half of the Cow Camp Road, where it approaches Deadman Creek. This end of the road is not improved and can easily be rehabilitated TK. The ecological and cultural resources that are being discovered in this area are too special not to protect.

The Park Service recognizes the Deadman Creek riparian corridor as an ecologically critical site (99) in the park and the designated Deadman Creek potential conservation site ranges from the creek watershed to the floor of the San Luis Valley at 7,600 feet (99) "all the way through the park (100). If any part of Cow Camp Road must be used for motorized access to the park, only the first half should be open. If access is extended into the eastern half of the road, the Park Service risks endangering the sensitive Deadman Creek ecological area. For the same reason, Cow Camp Road should not be extended eastward to connect to Liberty Road (61). Construction of the road connector and subsequent motorized use will only have negative impacts on the Deadman Creek corridor, including potential invasive species and damage to stream banks.

The narrowleaf cottonwood trees, a rare plant association found in the Deadman Creek riparian corridor, will be disturbed by visitor use if there is a road leading to the area. Also found near Deadman Creek are rare plant species and opportunities to observe rare wildlife, such as Townsend's big-eared bat. [insert additional information from CNE]

ii. Keep Liberty Road closed to public vehicles and to all motorized use beyond the first quarter mile within the park boundary

We encourage the Park Service to keep Liberty Road, a sandy two-track route, closed to public vehicle access (61, 374), and we discourage motorized use beyond the first quarter mile after the route enters the park. Liberty Road crosses Deadman Creek within about three miles after first entering park lands from the north, and frequent motorized use would damage the section of Deadman Creek that the route crosses. As noted above (page?), we reemphasize the ecological significance of the Deadman Creek riparian corridor. We ask the Park Service to recognize the risk of illegal use and trespassing imposed by introducing motorized traffic along this road, even permitted use, as it abuts an enormous section of the park's pristine backcountry lands and proposed wilderness.

iii. Keep proposed parking lot out of wilderness-quality lands

If a parking lot located inside the park is the best option for protecting sensitive ecological resources and visit or experiences of quiet and solitude within the park, we agree with the Park Service's decision to locate the parking lot in an area where the ground has been previously disturbed and natural resources have already been degraded, such as at the site of a former well pad. (page?)

C) Limit administratively-zoned routes at Medano Ranch

We support the Park Service's decision to allow only administrative vehicle access to lands in the southwestern portion of the park in order to limit public access to this area and therefore limit the potential of vandalism at nearby archaeological sites and damage to ecologically sensitive areas.

We strongly urge the park to limit the number of administratively-zoned motorized access routes around Medano Ranch. There is only one explanation provided in the draft management plan for the many administratively-zoned routes extending from Medano Ranch: Certain roads in the southwestern portion of the park were zoned administrative to allow agency access for operational activities such as resource management and monitoring (374). We urge the Park Service to limit motorized access to one main road and to allow any other roads, which may be only four-wheel drive roads, to be rehabilitated and reserved for travel by foot and by horseback.

Some of the two-track routes extending from Medano Ranch historic structures are used by park staff for the purpose of monitoring wells. We believe that the best way to monitor these wells and to preserve the natural resources in the area is to travel by horseback or by foot. No two-track or unimproved routes should only be zoned for

motorized use before a careful and thorough survey of park resources, ecological and cultural, that may be affected can be completed.

As noted above (page?), we reemphasize the ecological significance of Big Spring and Little Spring creeks. Some two-track routes that sprawl from the Medano Ranch approach and enter these creek corridors very near lands proposed for wilderness protection and the Guided Learning zone, providing easy access to sensitive resources for bold trespassers. We are concerned that in some cases, these routes extend into those sensitive areas. Please end motorized use on these tracks. If these routes must remain open, we believe the best option is to cherry-stem the roads with standard wilderness buffers.

D) Zoning Management zones accurately reflect park resources and goals

Overall, zoning for park lands, as proposed in the NPS preferred alternative, adequately reflects the sensitivity of the natural resources in the park. Guided Learning, Natural/Wild, and Backcountry Adventure zones provide proper management guidelines for wild park lands. We would like to affirm that lands in these three zones (wilderness-quality lands proposed for wilderness designation) should be managed as wilderness.

The Park Service should assert in the GMP that zoning designations should never be changed except to elevate their status, requiring increased protection for natural or cultural resources.

*Please see Backcountry Access section for comments on zoning of vehicle access roads in new park lands.

i. Rehabilitate unnecessary routes and protect wilderness-quality lands

We are requesting zoning changes for several backcountry routes. Excluding the main administrative vehicle access road to Medano Ranch, please zone all lands surrounding but not including Medano Ranch buildings as Natural/Wild or Backcountry Adventure instead of Administrative. The four-wheel drive routes that extend from Medano Ranch should be rehabilitated and reserved for those traveling by foot and by horseback.

In the northwest corner of the park, the land zoned Backcountry Access should be changed to Backcountry Adventure when the specific locations of access roads and parking lots have been determined in order to protect the remaining wilderness-quality lands. (see? section above)

ii. Guided Learning zone provides much-needed protection

The Wilderness Society endorses restricted access to sensitive archeological sites in the park. These sites, in which man's history is recorded through artifacts thousands of years old, are important for their educational and historical value. Their preservation is crucial to the visitor experience. Therefore, limitations are necessary to reduce traffic to these areas and to deter vandalism in these sensitive sites.

We support restricted access to sensitive archaeological sights within the park and believe that the Guided Learning zone in the park's preferred alternative provides appropriate regulations for the lands it encompasses. The significant cultural resources found in this area require intensive management and protection, but with the Park Service's careful planning, zoning designations will enable visitation without compromising the cultural sites visitors come to see.

E) Bison Consider reintroduction of a free-roaming herd as an option in the GMP [Awaiting feedback from CNE]

In general, we support the reintroduction of native species to their native habitat. The Nature Conservancy makes a good argument that bison are likely native to the area. If that is indeed the case, and bison are likely to have roamed this area, then we urge the Park Service to consider the option of managing a free-roaming bison herd. There are few herds left in the country, and this may be a wonderful opportunity to reintroduce one to its native habitat and add further to park visitors' experience. A bison herd could be a great asset to the park, and something visitors are willing to pay to support.

We understand that the park has limited space and resources to support the herd. Herds have been successfully reintroduced to smaller areas (CNE), but we support the Park Service's interest in securing ample space for a wild, free-roaming herd before committing itself to the project. It is possible that additional lands will become available through partnership with the Fish and Wildlife Service and Forest Service within the life of the GMP. The presence of bison in the park may restore a more ecologically complete

system, and such an analysis should be included in the GMP. It is worth analyzing the costs and benefits and providing the option for pursuing reintroduction within the life of the GMP.

The Park Service should be sure to consider whether any infrastructure necessary to manage and sustain this free-roaming buffalo herd would interfere with preservation of the wilderness character of lands within the park. The Park Service should address this issue in its GMP analysis of bison reintroduction.

F) Motorized/Mechanized Vehicles

We want to reaffirm that motorized travel in park should be minimized, OHV use is incompatible with park goals and mountain biking is inappropriate in park backcountry. We agree with Park Service's decision to prohibit OHV use and monitor for illegal use (p70) as OHV use is not compatible with park purpose and values.

Wednesday, July 11, 2007 While we understand that driving in sand on the Medano Pass primitive road is considered a fundamental visitor opportunity (128) and is an entrenched use, we do not *Page 24 of 87*

believe that motorized use is appropriate on park lands outside of designated front country lands. If motorized use continues on Medano Pass primitive road, the Park Service must make sure the location and volume of traffic do not degrade the natural values of Medano Creek or compromise visitors' experiences of quiet in the park. Fundamental visitor opportunities also include experiencing surge flow, playing in the Medano Creek near the foot of the dunes, opportunities which could be diminished if the upper sections of Medano Creek, its natural flow and high water quality, were impacted by traffic on Medano Pass primitive road. The park purpose, to protect the Great Sand Dunes and the system that sustains the dunes, should trump the importance of visitor access to driving a primitive road, especially if limiting use on the road enhances other fundamental visitor opportunities.

G) Land Acquisition Expedite purchase of subsurface mineral rights

We urge the Park Service to actively and fairly pursue ownership for all wilderness-quality lands within park boundaries. The acquirement of these lands is crucial to providing protection to an entire ecosystem to truly protect the future of the sand dunes and visitor experiences in the park. Please pursue options to acquire recommended wilderness lands as soon as possible and otherwise provide interim protection.

We are especially concerned about potential oil and gas exploration on lands within the national parks. These activities have the potential to degrade the area's ecosystems, threatening the survival of the sand dunes and the diverse wildlife in the park. Please make acquisition of subsurface mineral rights from Lexam Explorations a short-term goal.

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Comment

I am writing regarding the draft General Management plan for the Great Sand Dunes NPP. I understand that providing visitor access and services is the primary mission of the National Park Service, but I question the proposal to increase access to the northern portion of the park.

I believe that, with a few modifications, current access via the Liberty Road provides adequate public access. If the Liberty Road remained the primary access point, necessary modifications would include expanding the parking area, and clarifying the hunter and horse access via the Liberty gate. Currently, the signage at the gate regarding hunter access is the most contradictory and confusing bit of federal signage that I have ever seen.

The walk along the Liberty Road provides a chance to hike on or near the floor of the San Luis Valley without the crowds concentrated in the southern part of the park. The views are spectacular, and the peace and quiet remarkable. The area along the Liberty road has a sense of wildness after centuries of private ownership that is rarely found in the San Luis Valley today. Allowing vehicular traffic into the northern region of the park will destroy this sense of wildness. The park has done a good job, in my opinion, of providing handicapped access to the dune area in the southern part of the park, and I don't believe that providing ADA access is a good argument for expanding vehicular access into the northern regions of the park.

Another alternative would be to provide parking at the northern boundary between the park and the Baca subdivision at the terminus of Camino Real. Access for foot and horse travel to Deadman Creek via the Cow Camp road could then be provided by trail.

I urge the park not to extend vehicular access beyond the northern boundary of the park. As a frequent visitor to this unique area, I would hate to see it trashed by the increased visitor use that will inevitably accompany increased vehicular access.

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Comment

Don't think I've run into you since we moved from Crestone over to Montrose, but I have been keeping up with the slow process of developing a Management Plan for the Park. The purchase of the Baca Ranch and the formation of The Great Sand Dunes National Park was a wise move for the preservation of a critical ecosystem for the benefit of the American public and generations to come. With all the time, effort, and input that has gone into the process, I am frankly surprised that you would put it out for public comment absent addressing critical issues that were brought up early in the process and repeatedly raised since then.

The National Park, as well as the National Forest [that surrounds the Park], have been established for the benefit of the American people, who have paid the bills for same via hard earned taxes. Public access to both the Park and the National Forest is critical in this case. In reading over the rough draft and sorting out the useless verbiage and double speak, it seems that the Park Service has embarked on a mission to do all it can to restrict public access to the National Forest for hiking, hunting, and horseback activities that are allowed on public land.

Under Public Access to the Back Country Access Zone [P34], the Draft incorrectly states that there is no public access to that zone under NPS jurisdiction. The Liberty Road is an existing road currently used by your Park Rangers on a regular basis, and no one but NPS has jurisdiction on the first 7/10 mile. Feasibility of public use of the Liberty Road is a clear and obvious option. Why wont NPS allow the public to use that short crossing on an existing road? Access to the NF is addressed as an issue to be considered, but your draft fails to adequately resolve it. Reading between the lines, it certainly seems that NPS is attempting to turn that section of National Forest into an extension of the National Park.

Additionally, the Draft fails to resolve the issue of a Northern entrance to the Park. Consideration of access via the Baca Subdivision seems totally ridiculous, since other existing ranch roads are adequate with planned upgrading.

The plan mentions that back country horse and hiking parking will be at San Luis Lakes State Park. Frankly, this is equally as ridiculous since San Luis Lakes Park is at least 15 miles removed from any access into the National Forest.

The problem of the huge elk population that has been using the Park as a refuge is not properly addressed, and it seems that the Draft has totally disregarded the comments from the Colorado Department of Wildlife concerning elk impacts on Valley agriculture, as well as the Bighorn Sheep population.

Your GMP clearly states that the NPS will work closely with local, state, and federal agencies affected by activities at the Great Sand Dunes Park. Early on in the GMP process I heard concerns from many hunters that you were motivated to restrict hunter access to the National Forest through the Park. I took a wait and see stance, and after review of the Draft, am now convinced that those hunters had valid reasons to be concerned.

Since you are in charge of the Park, it is incumbent upon you to see that public access is provided through the Park to National Forest land and work in concert with other agencies to accomplish that. Your GMP needs to be revised to fully address these issues I have highlighted above. With the amount of time that has already been spent on the GMP, it makes no sense at all to delay a decision on these issues until some unspecified future date, since these issues beg consideration now.

If this Draft proceeds as written , absent proper consideration of these issues, you will certainly be legally challenged and the effects of that challenge will no doubt fall right on your doorstep.

I strongly encourage you to address these concerns in a positive manner.

Comment ID**2020****Mailing Information Comments****Comment Legistics Comments****Author Type**

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Comment

On behalf of the Colorado Division of Wildlife (DOW), I would like to thank you for the opportunity to comment on the GSRA Draft General Management Plan (GMP). My staff has reviewed the plan, and the following comments reflect the findings in that review.

My staff was unable to locate the letter that we submitted during the last comment period for this plan in the current draft. That letter is attached to this document as the comments made in that document are still valid and the most recent draft of the GMP fails to address the concerns we expressed in that letter.

In addition to our prior letter there are a few items in the GMP that I wish to address now.

Regarding the draft plan comments on pages 209, 247 and 273 which address the number of hunters, harvest rates and impact to the elk herd population; we need to clarify these statements.

The GMP reads, "Estimated numbers of hunters who might want to access the preserve and adjacent USFS lands to hunt elk range from 20-30 for each of the three 5-day seasons; equating to 60 to 90 hunters annually. The preserve and adjacent USFS lands are in CDOW game management unit 82. The success rate for elk hunters in GMU 82 in 2004 was 34% total, with 66% of harvested elk being cows. Based on the 2004 harvest rates and CDOW estimates for numbers of hunters, the potential number of elk not harvested from the preserve and adjacent USFS lands s estimated to range from 14 to 20 cows and 6-9 bull elk. Given that, at an estimated herd size of nearly 6,000 elk, the San Luis Valley herd is approximately four times larger than the 1,500-animal goal established by the CDOW. Removal or no removal of 14-20 cow elk and 6-9 bull elk would not make a substantial difference in efforts to reduce the size of this herd.

The above statements refer only to the National Preserve and those National Forest lands which are accessible only through National Park lands. Overall harvest in unit 82 is significantly greater. For example in 2005, total harvest in unit 82 was estimated at 332 elk. Of those 332 harvested elk, 215 were antlerless elk and 107 were antlered elk. Of the 215 antlerless elk taken that year, 90 plus antlerless elk were taken by hunters on special management hunts that were conducted on lands that will become National Park lands in the future. Since the implementation of these special management hunts in 2002 they have contributed an average of 140 antlerless elk to the harvest in GMU 82. These harvest rates have had a significant influence to the distribution of elk in GMU 82. Continued management hunts and/or harassment directed at elk in this area along with good hunter access to the Preserve and adjacent National Forest lands must continue in order to help address the elk management issues in this area. On page 269 of the draft plan the statement: "Providing guided hiking and equestrian trails in the guided learning zone, located within the San Luis Lakes/Sand Creek ecologically critical area, would provide beneficial impacts to rare plant communities..." Any and all accesses and special uses not related to hunting and fishing on the San Luis Lakes State Wildlife Area (SWA) are subject to review and approval by the Division of Wildlife. Such applications will be reviewed to determine compatibility with the purposes of the SWA. Applications for Special Use Permits are available through the Monte Vista office of the Colorado Division of Wildlife. If you have any questions regarding these comments please contact Rick Basagoitia at the Monte Vista office.

Comment ID**2021****Mailing Information Comments****Comment Legistics Comments****Author Type**

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Comment

I am writing on behalf of the Friends of the San Luis Valley National Wildlife Refuges to comment on the draft General Management plan for the Great Sand Dunes NPP. We agree with the majority of the preferred alternative described in the draft management plan. We support the proposals to address increased visitor use by creative management planning instead of by building additional facilities, and to develop bicycle paths to provide visitors with alternatives to motorized transportation within the park. We also support the acquisition of the Medano ranch for education purposes.

Our concern is the proposed access to the northern section of the park. The proposed alternative states that "Assuming neighboring entities find a way to provide vehicle access, the trailhead would be accessed via the Baca National Wildlife Refuge or..." We believe that including this suggestion to provide access via the Baca refuge in the proposed alternative was inappropriate. This suggestion has created tremendous public pressure on the US Fish and Wildlife Service to provide access across the refuge when doing so violates their policies. Providing visitor services may be the primary mission of the National Park Service, but the refuge system's primary mission is to protect wildlife and its habitat. The refuges' priority visitor uses include wildlife observation, wildlife photography, hunting, fishing, environmental education and interpretation. They do not include providing access to neighboring lands. An analogy would be if the US Fish and Wildlife Service proposed to the public that the Great Sand Dunes should allow elk hunting within the park boundaries because the elk were damaging refuge resources. It would create an administrative nightmare for the park staff to explain why hunting isn't allowed within the park.

The NPS preferred alternative states that it "was developed with substantial public, interagency, and NPS staff participation..." but we find it difficult to understand why the policies of the US Fish and Wildlife Service were not considered when the alternatives for northern access to the park were developed.

We believe that several alternatives for access to the northern part of the park exist, and that the suggestion to allow access across the Baca National Wildlife Refuge should never have been included in the draft management plan, and that any further plans regarding northern access not include this option.

Comment ID**2022****Mailing Information Comments****Comment Legistics Comments****Author Type**

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Comment

On behalf of The Nature Conservancy, I would like to thank you for the opportunity to provide comments on the Draft General Management Plan (GMP) and Environmental Impact Statement for Great Sand Dunes National Park and Preserve. We appreciate the Park Service's efforts to give thoughtful consideration to the management of globally important resources such as the dune complex (an extremely rare type of water- and wind-driven system), unique natural systems, and a host of threatened and endangered species that are endemic to the area.

The Nature Conservancy (the "Conservancy") is an international, non-profit organization dedicated to the conservation of biological diversity. Our mission is to preserve the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive. The Conservancy's programs are characterized by sound science and strong partnerships with public land managers and private landowners to achieve tangible and lasting results. The Conservancy greatly values its partnership with the National Park Service (NPS). Our organizations share many goals and an important overlap in mission – ensuring the preservation of natural resources. We now have a long history with the Park and are proud of the role that the Conservancy was able to play in the purchase of the Baca Ranch, the creation of the Great Sand Dunes National Park, and the formation of the adjacent Baca National Wildlife Refuge. We look forward to working with the National Park Service (NPS) through the implementation of the Park's plan. Overall, we strongly support the preferred alternative and believe that it lays the groundwork necessary to ensure the long-term persistence of the important ecological resources within the Park. We do, however, ask the Park Service to reconsider its elimination of the alternative to restore a native and NPS-managed bison herd, as bison are a critical component of the functionality of the landscape. Specific comments are below.

GENERAL COMMENTS

First, the Conservancy would like to compliment the NPS on the thorough, thoughtful process and subsequent decision-making that informed the draft plan for the Park and Preserve. Of the four alternatives considered, we think the preferred alternative does a very good job of balancing resource protection with appropriate forms of and locations for access and recreation. We strongly support wilderness designation for the vast majority of the new lands that have been added to the Park. This designation will help ensure the long-term persistence of the natural values of the Park, as wilderness allows for only minimal human impacts to the landscape. We are also pleased that NPS identified the three Colorado Natural Heritage Program potential conservation sites in the Park as NEPA ecologically critical areas: the San Luis Lakes / Sand Creek area, Deadman Creek, and Great Sand Dunes. We strongly recommend that protection of the unique and sensitive biological resources of these areas be given high priority in the implementation phases of this plan. We also support the designation of the Big and Little Springs and portions of their stream corridors as guided learning areas in the preferred alternative. This designation and appropriate management will add an important layer of protection to these fragile areas and their wildlife, and will also provide a substantial learning opportunity to the general public.

COMMENTS ON BISON RESTORATION

The Conservancy strongly supports consideration of restoring a bison herd to Park lands, and we concur with the statement that bison are native to the San Luis Valley (p.71). Bison were abundant before the 1850's and were extirpated as a wild species from Colorado and the Southern Rocky Mountain ecoregion when the last individuals were killed in South Park in 1897 (Armstrong 1972). Today, there are no significant herds present in the ecoregion that are managed for the benefit of the species except on the Medano Ranch. Analyses completed by the Conservancy and partners demonstrate that possible repatriation sites are rare and include the Great Sand Dunes landscape. Therefore, the Park Service's elimination of bison restoration from detailed consideration (p. 71) will compromise the long-term persistence of one of the Park's unique ecological resources. The Conservancy would strongly support the restoration of bison for several reasons:

1. Bison are one of only four native mammal species not currently present in a near-wild state in the ecoregion;
 2. Bison are a critical driver of ecosystem processes; and
 3. Restoration would provide the Park Service with unique and invaluable opportunity to play a significant role in the restoration of bison locally and in North America.
- In addition:
4. Bison restoration would conform with NPS reintroduction policy; and
 5. There are alternate views of the reasons that NPS stated for not considering bison restoration.

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Each of these points is described in detail below.

1. Bison are one of only four native mammal species not currently present in a near-wild state in the ecoregion. The four species not currently present include bison, wolves, grizzly bears, and wolverine. Of these, land owners and managers are most likely to support the restoration of bison due to the economic and ecological benefits they can provide.
2. Bison are a critical driver of ecosystem processes and are needed to meet the Park's long-term management goals. Our strong support for bison on the Park is based on the fact that bison, and large grazers in general, are significant drivers of ecosystem processes everywhere they occur (Coppock et al, 1983; Frank & McNaughton, 1992; Gibson, 1989; Lott, 2003). Bison have well-demonstrated effects on grassland and soil processes, plant diversity, abundance, and distribution (Cid, 1987; Collins, 1998; Lott, 2003; Yellowstone National Park, 1997), and the diversity and abundance of many other species such as prairie dogs (Krueger, 1986). Their wallows have been shown to have both short and long-term effects on landscape heterogeneity and complexity (Coppedge et al., 1999), as well as plant distribution and abundance (Lott, 2003). The role that bison play in grassland communities affects so many other species both directly and indirectly that they are sometimes referred to as a keystone species. Because of bison's critical importance to ecosystem functionality, not including its restoration in the Park plan is a critical decision that would seriously limit the Park's potential to restore the system's full spectrum of natural processes. Such a decision would also result in the Park's potential failure to fully protect the long-term persistence of the unique resources for which it was created. In addition, we feel that restoration of bison to Park lands may have an impact on the outcome of the U.S. Fish and Wildlife Service's consideration of such a possibility when they complete their long-term management plan for the Baca National Wildlife Refuge.
3. Bison restoration would provide the Park Service with a unique and invaluable opportunity to play a significant national and international role in the restoration of bison. There are only a handful of places in the United States where non-commercial bison herds currently roam over large landscapes (e.g., Yellowstone National Park, Badlands National Park, Wind Cave National Park, and Custer State Park). To the Conservancy's knowledge, the herd on the Medano is the only large, non-commercial herd in Colorado. Opportunities to restore bison are relatively few due to fragmented land ownership patterns, unsupportive policies of some land owners or land managers, and other factors. The Southern Rocky Mountains Ecoregional Assessment (Neely et al. 2003) reported that the Great Sand Dunes National Park and vicinity has the unique situation of having both a landscape and agency policy that can support bison restoration. In addition, bison were native to these lands, and their restoration in the National Park would be relatively cost-effective and efficient due to the presence of bison handling facilities, fencing, and bison management experience on contiguous Conservancy lands. The bison facilities at the Medano Ranch are state-of-the art and only used as absolutely necessary to maintain herd population size. From a global perspective, bison restoration is a critical issue. There are approximately 500,000 bison in North America, but only about 20,000 are considered conservation viable stock (Joel Berger, Wildlife Conservation Society Senior Scientist, personal communication). The vast majority, some 480,000 animals, are managed as commercial herds that are usually genetically impure and managed and culled in a manner that makes them of minimal value from a conservation standpoint. Bison that are performing a relatively natural ecological function in native habitat are very rare. Thus, it is critically important to take advantage of significant opportunities to restore bison--particularly non-commercial herds--to native lands. This opportunity is particularly important because of the long-term potential for the species within the Great Sand Dunes Complex.
4. Bison restoration would conform with NPS policy. The restoration of bison within the Great Sand Dunes National Park & Preserve would clearly meet NPS policy requirements as described below:
 - Adequate habitat exists to support the species. The Conservancy herd of 1200 animals occupies approximately 40,000 acres on the Medano Ranch. Based on observations by the Conservancy's Senior Ecologist, the animals range freely within the confines of the fence, require minimal management, and appear to be well below carrying capacity based on the degree of forage utilization even during times of severe drought such as that of 2002. Addition of the Park lands acquired from the Baca Ranch would almost double the size of the bison range and allow a considerably larger herd than now exists on the Medano. A herd of several thousand individuals would be at a level that can sustain genetic diversity over time (Berger & Cunningham, 1994).
 - The species can be managed so as not to pose a serious threat to the public. Bison are no more dangerous than other large ungulates, far less dangerous than bears and mountain lions, and there have been extremely few safety problems for humans in parks and preserves where bison/human contacts occur (Lott, 2002). The Conservancy has had no serious encounters or injuries from the bison population on the Medano Ranch even with significant increases in the number of humans interacting with the herd. Bison could easily be restricted by fencing them off from areas of high visitor use, which, in the case of the Great Sand Dunes National Park is the east face of the dune field.

- Genetically pure bison stock is available. Virtually all of the large, public bison herds have been tested for genetic purity, as have many of the private herds. A representative from Yellowstone National Park has stated that Yellowstone will be able to provide genetically pure, brucellosis-free animals for restoration projects in the near future. Wind Cave is already providing genetically pure animals for conservation projects. The nearby private herd on the Vermejo Park Ranch has genetically pure stock in its Castle Rock Herd and its owner expressed in 2005 a willingness to distribute animals from that herd to groups that intend to contribute to the conservation of the species.

In addition, the Conservancy's Medano herd has been genetically tested and a low level of bovine alleles was found. The Conservancy is currently creating a genetically pure herd by identifying the pure animals (complete) and selectively culling and adding pure stock (planned).

- The species disappeared as a direct result of human-induced change. To the Conservancy's knowledge, no one disputes the fact that bison disappeared from the San Luis Valley due to human-induced changes, over-harvesting or introduced ungulate diseases.

5. There are alternative views of NPS's justification for eliminating the possibility of bison restoration. The Draft plan states the following reasons for this elimination. An alternative view of each issue follows:

- Questionable presence of bison. "From the available literature, it is difficult to ascertain whether or not the modern species of bison (*Bison bison*) had continuous presence in the San Luis Valley" (p. 71). Alternative view: As noted in the draft on page 71, first hand accounts plus the fossil record leave little doubt that bison lived in and migrated through the Valley. While it is true that "documentation for the presence of bison in the Valley is scant at best" (p.71), the information that does exist is convincing. For example, it is highly likely that bison roamed the San Luis Valley year-round and in sizable numbers based on the amount and type of forage and water available and on their proven ability to prosper on the Medano Ranch year-round. Bison fossils have been found in many of the valleys of the Central Rockies as far west as Grand Junction (Joe Truett, Turner Endangered Species Fund, personal communication). Bison occurred in other montane parks in Colorado (Armstrong 1972, Meaney and Van Vuren 1993) and at least in South Park occurred year-round.

In the most thorough reviews of bison ecology, it is clear that movements of the species were unpredictable even in the 19th century (Roe 1970; Shaw and Meagher 2000). In other words, they were nomadic rather than migratory (with migratory indicating movements from predictable place to place). Nomadic behavior is a response to variable forage and/or water, so bison wandered to find places of resources and compatible conditions if they were unpredictable or highly variable. In the San Luis Valley, however, forage and water have been relatively predictable and thus would have been appealing to resident bison. This predictability of resources could have reduced their need to move to other locales.

- Insufficient habitat. "Today, available bison habitat within the Park is very limited compared to that needed by a wild (unconfined) bison herd on a year-round and year-to-year basis" (p. 72). Alternative view: For a herd on Park and TNC lands combined, there is sufficient habitat for a bison herd of a size large enough to allow for a desirable level

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On May 18, 2005 the Board of Directors of the Baca Grande Property Owners Association (POA), representing over 3,400 property owners, sent you a letter strongly opposing a northern entrance through our subdivision to the Great Sand Dunes National Park and adjacent U.S. Forest lands. They also stated their opposition to having our subdivision streets near the Park boundary be used for parking for Park visitors.

As the public comment period for the proposed General Management plan draws to a close, I am taking this opportunity to reiterate the stance of the Property Owners Association, on behalf of the majority of its members.

Establishing the entrance to a national park through an existing community is without precedent in the U.S., as far as I can discern. That this seems likely to occur in our community, internationally known as a place to come for solitude and religious retreat, is not without irony.

While the Park Service does not specifically propose an entrance coming through the community, your plan creates a de-facto vehicle entrance, by creating a vehicle friendly "back country access" zone; one which is contiguous with the subdivision's southern boundary but inaccessible from any other direction,

In addition, your plan provides for vehicular access to USFS lands through our subdivision without establishing or demanding any limits on the number of those vehicles. (Page 62, "...if no public vehicle access to the north part of the park could be found over the long term.. the NIPS would provide gates for horses [access to Forest Service land] at the north park boundary at Camino Real and Liberty Road.")

While your plan calls for limiting the number of parking sites available inside the park (at the north end) and creating some sort of regulatory limit on the number of vehicles that can park there (should demand become excessive) it nowhere addresses limiting the number of vehicles entering through the park lands to access forest service lands. That number is likely to exceed, by far, the number of park visitor-vehicles only. This makes it quite difficult to estimate the actual number of vehicles that the NPS is proposing to allow entry to and begs the question of whether the USFS is circumventing its mandated public process in the development of its own general management plan.

We are pleased that the NPS has agreed to join other interested parties participating in ongoing facilitated discussions led by the Sonoran Institute. Hopefully these discussions will bring us to a mutually agreeable solution which provides adequate and appropriate access into the Park while protecting the quality of community that we value.

The POA heartily supports the designation as Wilderness of 51,000 acres of park land — and the maintenance of true wilderness values on those lands.

Comment ID**2024****Name****Mailing List****Mailing Information Comments****Organization Name****Local****Comment Legistics Comments****Street Address****City****State****Zip****Author Type****Comment Type****Telephone#****Email**

Organization

formal letter

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Comment

I am pleased to have the opportunity to comment on the Great Sand Dunes National Park and Preserve General Management Plan/Wilderness Study Draft environmental Statement (DEIS). As the Forest Supervisor of the neighboring land management agency and also a recipient of portions of the former Baca Ranch, I have a great interest in the Great Sand Dunes National Park and Preserve General Management Plan (GMP).

I am encouraged by the National Park Service commitments in the GMP to work collaboratively with the Park's neighbors. However, I believe that the two most important issues to the Forest Service are not adequately addressed in the proposed alternatives in the DEIS. These issues are 1) providing public motorized access through the National Park to National Forest lands and 2) management of the burgeoning elk population which is having an adverse effect on habitats within the National Forest.

I previously sent you a letter dated February 14, 2005 with 10 concerns that I asked to be addressed in the DEIS. I do not feel that these have been adequately addressed in the GMP. These concerns are still valid and they need to be fully addressed in the FEIS and GMP. The Colorado Division of Wildlife (CDOW) also sent you a letter, which I could not find in the DEIS, that provides you with CDOW's issues and concerns regarding the elk population and elk management. I fully agree and support their input to the GMP analysis.

I have several specific topics that I want to bring to your attention in this letter.

(1) Cooperating Agency

The issues articulated in this letter are of great importance to me in my responsibilities to appropriately manage the National Forest Baca Mountain Tract. Therefore, I am requesting that you grant me Cooperating Agency status under 40 CFR 1501.6, to ensure that these concerns are fully considered in your analysis and GMP. Although we have been working with you on an informal basis up to this point, I feel it is appropriate to request formal Cooperating Agency status in this analysis to ensure that our two agencies work more closely together on the development of the final GMP. I also encourage you to request that both the US Fish and Wildlife Service, as a neighboring federal agency involved with access to the National Park, and the Colorado Division of Wildlife, with expertise and responsibility for elk management, be invited to become Cooperating Agencies as well. I feel strongly that the three affected federal agencies and the CDOW should be closely working together to ensure that each agency's goals and mission are being met. This would also dovetail well with the current efforts of Saguache County and the Sonoran Institute to come to a multi-agency resolution 01' access to the National Park and the National Forest.

The Rio Grande National Forest has initiated our planning effort for the Baca Mountain Tract. I am proposing that our two agencies conduct our management planning for our portions of the Baca Ranch concurrently so that the public is effectively engaged once and the efforts are as compatible as possible. I encourage you to join the Forest Service as a cooperating agency as we amend our Forest Plan to add the Baca Mountain Tract under the direction of our Land and Resource Management Plan for the Rio Grande National Forest.

(2) Public Access to the National Forest

There are substantial NEPA weaknesses in the DEIS regarding the access issue. The DEIS Purpose and Need for the GMP includes the need to define public access (p. 7) and a key issue defined in the DEIS is access to other federal lands (p. 33). However, the DEIS never substantively responds to the stated purpose and need for the GMP relative to the access issue in any alternative. While the DEIS and GMP appear to address the issue of public access to the National Forest, in reality there are no alternatives in the DEIS which provide any public motorized access to the National Forest. Instead, the DEIS inappropriately postpones an analysis of access to the National Forest to an uncertain future analysis and decision. This violates NEPA by segmenting the decision and avoiding an issue which is ripe for decision at this time.

The FEIS and GMP need to address this issue directly. The Forest Service will work as a collaborative agency with you on an alternative which provides unrestricted motorized public access through the National Park to the National Forest.

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The DEIS should also clearly describe the current existing access on the Liberty Road. The reader may be confused by the way the Liberty Road is discussed in the DEIS. It appears as an afterthought and as only the fourth possible access route to the National Forest, when in reality it is the only current existing access route. It should be described as the existing route and then compared with other alternative access routes which could be developed in the future.

(3) Wilderness

While it may not be readily apparent to the DEIS reader, the area of the Baca Ranch has been intensively used since Euro-American settlement with roads, water developments, livestock grazing, mining and habitation. It was an intensively used ranch until just a few years ago. The Baca Ranch lands are not in a pristine condition. Both the newly acquired National Park and Forest Service lands are in similar condition and neither agency owns the mineral estate. The Forest Service will also be conducting a wilderness suitability assessment in the Baca Mountain Tract through our Forest Plan amendment analysis. My initial assessment is that it is unlikely that the Baca Mountain Tract would meet the wilderness suitability criteria used by the Forest Service.

The DEIS for the GMP recognizes the past human development and influence on Baca Ranch lands but then determines that these lands can be restored to wilderness and thereby declares them eligible for wilderness designation. However, the GMP does not include the actual restoration activities which would be required to make them suitable for wilderness in any alternative. I applaud the GMP for recognizing the need for restoration. I would like to see these restoration activities included in at least one of the alternatives. This should also include the cost and likelihood of each of these restoration actions actually occurring, so the public has a complete understanding of this commitment. There should also be more discussion on why the existing roads would be compatible with wilderness condition and how the National Park Service would obtain the privately owned land and mineral rights within the proposed wilderness. Without a commitment in the GMP that the land would be restored to wilderness condition, it seems that the proposed wilderness designation is unrealistic.

(4) Range of Alternatives

The DEIS/GMP suffers a NEPA weakness in that the analysis is constrained by a range of alternatives which are too narrow. I would like to see the alternatives expanded to include the discussion below.

I encourage you to consider a new alternative or expand an existing alternative to provide restoration activities in the GMP to allow wilderness designations to be meaningful. I strongly disagree with the DEIS assessment that the Baca Mountain Tract is in near pristine condition. As stated in the Wilderness topic heading above, the land has been historically impacted, I would like to work closely with the National Park Service as a collaborative agency on restoration needs -- especially on topics such as existing noxious weeds, the multitude of roads from the National Park onto the National Forest, and working together with the CDOW toward maintaining the elk population within herd objectives (which affects both land management agencies).

As previously discussed, the EIS also needs an alternative which provides public motorized access to the National Forest across the National Park on the existing Liberty Road. This could be accomplished in the GMP or by providing the Forest Service with a road easement or similar authorization to use the road. This is the only existing feasible access route to the National Forest. The public currently has legal access on Saguache County roads through the Baca Grande subdivision to the National Park Liberty Gate. The Liberty Road then extends across the National Park for .7 miles and then onto the National Forest for the length of the western boundary of the Baca Mountain Tract.

Developing this alternative would provide the National Park Service with an alternative(s) to develop management options for the public entering the National Park from a parking lot located on the National Forest. This alternative would result in reduced impacts to the National Park from new roads and parking currently proposed in the GMA Preferred Alternative. Any parking lot and associated trail system into the National Park could be developed collaboratively between our two agencies, including mitigation measures to minimize visitor impacts to the National Park.

(5) Elk

As previously stated, the Forest Service has concerns over the impacts of the existing elk herds on habitat and other wildlife on the National Forest including the Baca Mountain Tract. The National Park Service recognizes the need to manage wildlife populations when they exceed the carrying capacity of the habitat in other National Parks. For example, Rocky Mountain National Park is addressing elk management due to overpopulation and impacts on habitat inside and outside that National Park. I think it is essential that the GMP be proactive on this issue and provide a management plan, or at least ensure there is flexibility in the GMP, to manage elk into the future for both the National Park and their neighboring land owners.

(6) Federal Advisory Committee Act of 1972 (FACA)

The access decision described in the GMA, pg 61, last paragraph misleads the public since it does not accurately reflect federal agency authorities and responsibilities, and violates the FACA. The DEIS should provide a clear definition of the roles of the public and the different agencies in the EIS/GMP process.

(7) Alaska National Interest Lands Conservation Act of 1980 (ANILCA)

Comment ID

2025

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Please accept the following comments on the Draft General Management Plans Wilderness Study, and Environmental Impact Statement for the Great Sand Dunes National Park and Preserve (GRSA). We commend the National Park Service for putting together a thorough and thoughtful plan that provides the strong protection that the GRSA deserves.

1. Wilderness and Wild and Scenic Rivers

We commend the National Park Service (NPS) for its wilderness recommendations. As the strongest and most permanent protection available to public lands, wilderness protection will protect a natural backcountry experience, natural landscapes, viewsheds, soundscapes, wildlife, natural processes and habitats. We offer two comments for your consideration in regard to wilderness.

First, we recommend that you consider creating a third wilderness category called 'potential wilderness areas' and apply it to the block of land north of the Cow Camp Road once the northern access issue is resolved. All lands not needed to provide access to the mountain front in the northern section of the park should revert into a recommended wilderness status once the access decisions are made, so long as they can adequately stand alone as wilderness or can be linked to the recommended wilderness in the south. Lands labeled as potential wilderness areas should be managed as wilderness with the exception of an accessway that, if and when established; would provide for motorized and mechanical transport.

Second, we recommend that you consider slightly redrawing the wilderness boundary in the southwest corner of the park in the Natural/Wild zone. Specifically, to facilitate manageability, we recommend that the wilderness boundary on the east side of this southwestern section be drawn to surround the administrative roads and facilities with a 100' buffer. This is standard for wilderness boundaries around roads in Colorado, and provides the most identifiable and manageable boundaries.

We commend the GRSA for recognizing the outstanding values that the rivers in the unit possess and for recommending the segments for wild and scenic river designation. The rivers that flow from the Sangre de Cristo Mountains into the GRSA are remarkable state resources that deserve permanent protection from future development. However, according to Our interpretation of section 5(d)(1) of the Wild and Scenic Rivers Act and resource court interpretations of this section, the NPS has the duty to consider potential national wild, scenic, and recreational river areas in all planning. This, by our reading, requires an analysis of the eligibility of Pole Creek in the General Management Plan. Hence, we recommend that the GRSA assess the values in Pole Creek and include the analysis in the final plan and decision.

2. Bison

We were excited about the prospect of reintroducing native bison to the San Luis Valley as a native and wild species. Hence, we were pleased that the plan leaves open the possibility of future reintroduction if adjacent landowners demonstrate Interest in a cooperative introduction. We defer to The Nature Conservancy's expertise regarding bison's native range as expressed in the comments that they submitted on this draft plan, and urge the GRSA to take a second look at the decision not to reintroduce bison into the greater park area.

Please note that the planning matrix at the end of chapter 2 describing bison management is inconsistent with the direction in the plan. Specifically, the matrix says that reintroduction will not be considered while the plan says that the Park Service would consider reintroduction if cooperative land management opportunities arose.

3. Access on the north side of the park

Given the complexity of the access situation on the northwest side of the park, we support the park's decision to put the access decision on hold until a local decision-making process can play out. Since the plan only provides a sketch of potential access opportunities, we will provide brief comments on each of the options.

If access is provided via the Cow Camp Road, we recommend that the end of the road be located somewhere to the west of the proposed location, in order to 'protect the sensitive biological and riparian values in Deadman Creek. The proposed location of the road's terminus on the map of the preferred alternative appears to be within the Deadman Creek Potential Conservation Site (PCS). Locating the parking lot and trailhead further to the west would avert impacts to the PCS, especially if the GRSA constructed a trail that would lead people to the drainages to the south instead of to Deadman Creek.

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If access is provided via Camino Real or Liberty Road, we recommend that the parking lot and trailhead be located outside of the Deadman Creek PCS and hikers, via trail development or educational signs be urged to hike a less sensitive drainage to the south. In addition, the GRSA should leave open the possibility of creating a parking lot outside of the park boundary in cooperation with the subdivision. Until a decision is made, we urge the NPS to maintain gates at the boundaries that only allow pedestrian and equestrian access.

We support the GRSA's proposal to limit facility development in the north section of the park to a parking lot with a maximum of 15 parking spots (including horse trailers) and a trailhead. We also support the GRSA's general policy of trying to identify governmental or non-governmental partners to jointly develop trailheads, visitor centers, and other facilities outside of the park.

4. Medano Pass Road

We support the GRSA's proposal to disallow off-road vehicles on the Medano Pass Road (and anywhere else in the Unit). Off-road vehicles change the mood of the experience that the park offers (from backcountry natural to backcountry thrill), and can result in damage to areas adjacent to main accessways. In our opinion, off-road vehicles are an inappropriate form of recreation in National Park units.

We are concerned about the camping that occurs along the NPS side of the Medano Pass road. As we understand it, the park allows off-road travel to camp within approximately a 200' swath from centerline. We urge the GRSA to eliminate dispersed camping, or at the very least manage it with enhanced rigor, such as by creating a limited number of dispersed developed (i.e. hardened and identified) campsites along the road. The latter may not be consistent with the proposed description of a backcountry access zone that disallows camping outside of an established primitive campground. Moreover, the latter should only be allowed if the GRSA is confident that it can provide adequate law enforcement on a nightly basis along the entire stretch of the road.

Unregulated dispersed camping leads to ecosystem degradation, trash and litter, and a heightened chance of wildlife. If the GRSA eliminates dispersed camping on the NPS side of the pass, four wheel drive enthusiasts who want to camp along the road can easily camp on the forest Service side of the pass to the east.

Lastly, if the GRSA insists on allowing dispersed camping along the road, it should do it in a manner that is consistent with adjacent Forest Service management. With the implementation of the recently released Forest Service off-road vehicle rule, the Pike-San Isabel National Forest will be reconsidering its dispersed camping policies. At a minimum, we are hopeful that the National Forest will eliminate driving off-road to camp (still allowing dispersed camping in many areas so long as vehicles park on the edge of designated routes).

5. Four wheel drive tours

The plan states that the GRSA will allow four wheel drive tours (page 60). The plan should clearly state under what conditions these tours will occur (e.g., how many each day, the objective of the tours, the oversight provided). We recommend that they are only allowed for educational purposes, operated by the NPS or under a rigorously managed contract to a non-governmental entity, and on a limited basis on administrative roads. The plan should also state why 4-wheel drive tours meet the "necessary and appropriate" standard utilized by the NFS.

6. Shuttle system

We recommend that the GRSA seriously consider implementing a car shuttle in the developed area in the southeast side of the park on crowded summer days. Shuttles have numerous environmental and social benefits including enhanced visitor experiences; reduced emissions, reduced noise pollution, and reduced construction costs of additional parking spaces.

7. Carrying capacity

The plan outlines the general concept for carrying capacity modeling but does not commit the GRSA to undertaking a capacity plan within a limited number of years. Without this commitment, the section on carrying capacity, and the protections the plan relies on because of carrying capacity limits, is relatively meaningless. Hence, we urge the

GRSA to commit in the final plan to undertaking and completing a capacity plan within five years of the final plan decision. A supplementary carrying capacity model, plan, and decision should establish enforceable thresholds, indicators, and adaptive management options.

Comment ID**2026****Mailing Information Comments****Comment Legistics Comments****Author Type**

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formal letter

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Comment

Center for Native Ecosystems is pleased to provide these comments on the Draft Management Plan for the Great Sand Dunes National Park and Preserve. The unique landscape of the sand dunes is of great conservation value not only for education and enjoyment by the public but also for the preservation of biological diversity and native ecosystems in the region, and we are deeply grateful that the National Park Service so readily recognizes these values and has proposed a management plan that would serve to protect these values in important ways. We also recognize the National Park Service's leadership in valuing and managing for such values.

Center for Native Ecosystems (CNE) is a non-profit advocacy organization dedicated to conserving and recovering native and naturally functioning ecosystems in the Greater Southern Rockies and Plains. CNE values the clean water, fresh air, healthy communities, sources of food and medicine, and recreational opportunities provided by native biological diversity. CNE also passionately believes that all species and their natural communities have the right to exist and thrive. CNE uses the best available science to forward its mission through participation in policy, administrative processes, legal action, public outreach and organizing, and education. The unique ecosystems encompassed by the Great Sand Dunes National Park and Preserve are a conservation priority for CNE and its members. The region is rich in biological diversity and is home to rare native species such as the San Luis Dunes tiger beetle and the Rio Grande Cutthroat trout. These and other native species that are critical components of the larger ecosystem will be greatly affected by the land management proposed and enacted by the Park Service in the Great Sand Dunes National Park and Preserve.

CNE commends the National Park Service (NPS) for its faithfulness to the purpose and values outlined for the Great Sand Dunes National Park and Preserve Act of 2000, namely those of ensuring the preservation of the dunes, the larger ecoregion, and the unique natural processes, landscapes and biological communities in the park. CNE also specifically recognizes the NPS's decision to propose almost 51,000 acres of land for wilderness protection in its preferred alternative - this is a sound decision that will have multiple positive effects on the health of the ecosystems represented in the new wilderness designation.

Overall, we strongly support the NPS's preferred alternative. It appears to lay a solid framework for protection of the natural resources of the area. As the NPS knows, the Sand Dunes region contains many rare species that will benefit from management that emphasizes their conservation, as well as from the relative protection from disturbance and habitat modification or loss that wilderness designation will provide. These species include the Great Sand Dunes anthicid beetle, the San Luis Dunes tiger beetle, the giant sand treader cricket (camel cricket), the Rio Grande cutthroat trout, Smith Whitlow-grass, catseye, and the slender spiderflower. In addition, the Park and Preserve encompass several plant communities that are rare in Colorado or globally. These communities either represent rare plant associations or rare habitat types. These communities include montane riparian forests, thinleaf alder/mesic forb riparian shrubland, narrowleaf cottonwood skunkbrush, Great Plains salt meadows, subalpine riparian/wetland carr, and Populus angustifolia sand dune forest. In general, the NPS proposed management alternative will enhance the protection for and contribute to the preservation of these natural communities and rare species.

In addition, the NPS proposed management plan would protect portions of several areas proposed as Potential Conservation Areas (PCAs) by the Colorado Natural Heritage Program, including the Deadman Creek and San Luis Lakes PCAs. In both these cases, the NPS has rightfully recognized these areas as "ecologically critical" and "potential conservation sites." However, the proposed wilderness designation does not include the full extent of the PCAs. As areas immediately within the wilderness boundary will be affected by disturbance of adjacent but interdependent areas outside the boundary, we encourage the NPS to consider extending the wilderness boundary to include more or all of these PCAs.

Specifically, in the northwest corner of the Park, the NPS should consider moving the wilderness boundary north of the Cow Creek Road so as to encompass more of the Deadman Creek ecosystem and its surrounds. Deadman Creek supports the rare Smith Whitlow-grass, the Canyon hog orchid, a population of Rio Grande cutthroat trout, and the state's exemplary and largest occurrence of the rare narrowleaf cottonwood Rocky Mountain juniper montane riparian forest community. Ensuring all of these outstanding natural values remain viable is best accomplished by protecting the maximum extent of this PCA.

The NPS should also consider moving the wilderness boundary in the southwest corner of the Park to the southern and western boundaries of the Park, so as to include

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more of the rare and important sabkha ecosystem, encompassed by the San Luis Lakes PCA. This corner of the Park is part of largest concentration of wetlands in the region, and the highly saline wetlands and dune ponds found here are relatively rare. The wetland plant communities found here include small flowered sedge wet meadow, aquatic catbrosa/common monkeyflower spring wetland, spikerush wetland, mare's tail wetland, and aquatic smartweed wetland. This area also supports one of the largest populations of the globally rare slender spiderflower, populations of which have decreased dramatically in other parts of its range in the last 100 years. In addition, the plains pocketmouse and silky pocketmouse have been seen in the San Luis Lakes region, and two rare invertebrates have been recorded here as well: the giant sand treader cricket (camel cricket) and the San Luis sandhill skipper. A number of rare bird species also use the area, including the short-eared owl, snowy plover, long-billed curlew, black-crowned night heron, white-faced ibis, and Forster's tern. Expanding the wilderness designation in this corner of the Park to the maximum extent possible would enhance the protection of this important habitat for all these species and plant associations.

In general, we encourage the NPS to consider the expert commentary provided by the Wilderness Society when evaluating their decisions about the boundaries of the proposed wilderness areas within the Park. We support and incorporate by reference here all commentary received from the Wilderness Society.

One additional management decision, regarding bison, also deserves reconsideration. We believe the NPS should consider managing for a free-roaming wild bison herd. Bison could be an important driver of ecosystem processes in the Park. They can benefit the grassland environment in multiple ways, including enhancing native plant diversity and abundance, improving soil processes, and contributing to landscape heterogeneity and complexity. Bison are also likely native to the San Luis Valley, arid while there are few sites that have been identified as appropriate for bison reintroduction into the wild, the Sand Dunes is one of them. Bison reintroduction in the Park would be consistent with NPS policy and the Park's mission, and it may even help the NPS meet its goal of long-term preservation of the naturally functioning ecosystems of the Park.

Comment ID**2027****Mailing Information Comments****Comment Legistics Comments**

Also supported by Brad Hitt (PEPC # 187668), Lynn Stagner (PEPC # 186889), and Kevin Stagner (PEPC # 186890)

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Comment**NATIONAL FOREST ACCESS AND NORTH BOUNDARY ACCESS**

1)It appears that citizens of the United States that purchased the new portions of the National Park and National Forest are being denied access to hunt, ride horses, collect antlers and collect other forest products on National Forest Lands according to the draft plan. This needs to be addressed and resolved in the Great Sand Dunes National Park and Preserve General Management Plan.

2)I enjoy hunting and riding horses. Being able to access the National Forest without having to traveling 12 miles across the sand dunes from the National Park headquarters is important to me. I would like the freedom to hunt (carry a firearm to and from the National Forest) and carry harvested game from the National Forest without a special Park Service Permit through the Liberty Road. This plan must be rewritten to address this issue.

3)This plan does not address the immediate need for public parking and horse access on the north end of the National Park. It only allows the minority Baca Subdivision residents hiking access but does not address the immediate need for public access to the north end of the park. This can not be put off and should be addressed now.

4)On page 34 of the draft plan it states under Public Vehicle Access to the Back Country Access Zone in the Northern Portion of the National Park, "Some alternatives in the GMP propose a back country access zone in the northern portion of the national park for purposes of public vehicle access to a small trailhead (and a campground in one alternative). Due to surrounding land ownership, road patterns, topography, and designated wilderness, there is presently no way to access this backcountry access zone by vehicle. There are two potential ways to drive into this zone located within the national park: 1) via Saguache County public roads through the Baca Grande subdivision, or 2) via road (s) through the Baca National Wildlife Refuge. Both options have drawbacks. Because public vehicle access to this backcountry zone is outside the control and jurisdiction of the National Park Service, this GMP does not resolve the question of which option, if either, might ultimately be used." This statement is incorrect and there is currently a way to access the back country zone by vehicle on an existing road. Your park rangers drive the Liberty Road on regular basis and no one but the Nation Park Service has jurisdiction of the first seven tenths of a mile on that road. It is very feasible to use the Liberty Road as the access point to the back country without building a new road. This is solely under the control and jurisdiction of the National Park Service. This plan must be rewritten to address the Liberty Road as a northern access to the back country zone and the National Forest.

In the purpose and need for the plan it clearly states that "Access to the National Forest" is an issue. However, the statement in the purpose and need is totally misleading to the public. On page 36 of the purpose and need, it states that "The Rio Grande National Forest has preliminarily identified the need to provide the public with vehicle access (to provide for the use and enjoyment of the National Forest) along the existing US Forest Service Portion of the Liberty Road that lies within the Rio Grande National Forest boundary." This is a false statement according to the official letter written by the Rio Grande National Forest on Page 426 of the GMP. The letter states that the Rio Grande National Forest is requesting, "Unencumbered vehicle access across the park for hunters to NFS lands on the Liberty Road, Mosca Pass Road, and Medano Pass Road." Whether public vehicle access would be allowed along the existing Forest Service portion of the Liberty Road is yet to be determined in the Forest Service planning process. Due to this misleading statement a new draft plan must be written to strike this misleading statement and disclose correct information.

In the purpose and need for the plan it clearly states that "access to the National Forest" is an issue. This issue is not addressed in this plan but put off to an uncertain joint planning process. The draft General Management Plan then tried to analyze the affects of an uncertain future action not addressed in this plan. An adequate range of alternatives was not presented in this plan based on the purpose and need. This is a violation of NEPA and this plan must be rewritten to adequately address and resolve access alternatives.

5)The National Park should not be planning visitor access for the National Forest. Putting quotas/permits on vehicle numbers in a parking area on the north end of the Park to limit numbers of people entering the National Forest should not be determined by the National Park. The National Forest and National Park have very different missions and making this new section of National Forest a "De Facto" National Park would be a tragedy. The public purchased this National Forest Land to be managed as National Forest. This plan must be rewritten to finalize vehicle access to the National Forest and allow the National Forest to manage their lands.

6)I am also concerned that the National Park is very limited in its options to access the National Forest and the northern section of the National Park. The Liberty Road is clearly the only road that is presently in existence that accesses the National Forest from the Baca Subdivision through the National Park. No new road construction is needed and the only agency that has jurisdiction to allow that access is the National Park Service. This decision is truly not a collaborative process decision but a National Park Service decision that is being delayed in order to make Steve Chaney look good in the eyes of the Baca Subdivision. This document doesn't adequately address the Liberty Road as an access to the National Forest or the National Park. A county road already exists to the Liberty Gate. There is only seven tenths of a mile between the

Liberty Gate and the National Forest boundary. Clearly it is a Park Service decision to allow access to the National Forest. Steve Chaney is paid by the tax payers of the United States of America to make hard decision and this is one that should be made now and not put off to a later date or put off to a long term solution. On page 61 of the preferred alternative it states that "there are no simple long-term solutions to provide vehicle access to the NPS or USFS lands." I disagree with this and there is clearly a solution on the Liberty Road which needs to be addressed now.

7) I am amazed that the National Park Service is making believe that there is no visitor use on the Liberty Road, The Liberty Road is used every day by many people. The Liberty Road is obviously used to access the back country and the National Forest. The seven tenths of a mile section of road should be indicated on the map as a "back country access" location, not just National Forest and not the National Park. In this part of the Park people are not drawn to see sand and rabbit brush, they are drawn to trees and mountains on the National Forest. This must be addressed in the plan. People patterns are already established at the Liberty Gate and this is not going to change unless you put a moratorium on hiking access across the northern boundary just like you did with recreational stock. If you are going to put restrictions on recreational stock users you should also put those same restrictions on hikers,

8) In one section you mentioned possible indicators to install quotas/permits to reduce visitors in the northern portion of the National Park. One indicator listed to limit the number of people accessing this area was noxious weeds especially in and around Deadman Creek. Noxious weeds already exist along Dead man Creek. It is important to know what the current noxious weed condition is on the new section of the National Park in order to use this as an indicator. It is also most likely that Elk are and will be the transporters of noxious weed seed not people. Until the elk population is reduced to a reasonable number this should not be an indicator of limiting access to people. This plan must be re-written to show a current noxious weed map and to address the concern listed.

9) I am concerned about a statement made in this plan that back country horse and hiking access parking would eventually be based out of San Luis Lakes State Park. I am against changing this back country parking area to San Luis Lakes State Park because it will increase my hiking/horse time and make it more difficult to access the Preserve or National Forest. This will increase my horse riding and hiking time to approximately 25 miles, across the sand without water along the route, just to reach the National Preserve or National Forest. This is not a hiking or horse friendly alternative. Nor do I support moving a horse and hiking trailhead to the Oasis area for the same reasons.

ELK

1) As for the extremely large elk population, it is not addressed in the preferred alternative or any of the alternatives. The overpopulation of elk is a huge issue and it is not identified as an issue in the purpose and need for GMP. When this area was under private ownership I respected that private property owner's right to not manage elk numbers. But now that this land is owned by the citizens of the United States of America and we have an obligation to protect our natural resources and other wildlife species from the overpopulation of elk. Not only are these elk affecting vegetation and wildlife populations on public lands they are also affecting agricultural crops in the San Luis Valley. Elk referenced in the Affected Environment section of the GMP under Designation of Additional Wilderness and it states, "The CDOW has expressed concern about the potential consequences of the wilderness designation on CDOW effort to control elk numbers," on page 162. It appears that the this plan has disregarded the comments from the CDOW about managing this area as wilderness with out giving a definite answer on whether or not a minimum tool proposal will be approved. I am under the understanding that it is very difficult to get approval to use motorized vehicles in wilderness even when going through the minimum tool procedures. It appears that you didn't adequately address the CDOW's concerns.

Elk are also mentioned in the environmental consequences section on page 220 and 221. The National Park Service should not be analyzing the affects of uncertain future actions not addressed in this plan, like hunting and public access to the National Forest or an Elk Herd reduction plan tentatively planned pending justification. This section contradicts itself and this plan will have major adverse impacts on vegetation and other ungulate species due to the overpopulation of elk as stated on page 220. "Reduction on hunting pressure on elk in this area may exacerbate rapid population increases that may be linked to declines of other native ungulate populations (bighorn sheep and mule deer), and to habitat degradation in the Sangre de Cristo Wilderness." This must be addressed in this plan and not put-off to some (maybe) future planning effort.

The elk issue is not addressed in the purpose and need section of the GMP, therefore you do not have an adequate range of alternatives to address the overpopulation of elk. This document must be rewritten to address the overpopulation of elk and it's affect on the National Park and adjacent 2) I disagree that ungulate herd numbers and health

due to the facilitation of elk hunting will have negligible to minor beneficial impacts. If elk numbers were in check, elk hunting would be very beneficial to keep numbers at a manageable level.

3)I also disagree that the preferred alternative will have a minor to moderate adverse impact on bighorn sheep. Elk are totally impacting big horn sheep habitat and they could be causing disease problems for big horn sheep as well. Not addressing this issue now will have major adverse impacts to big horn sheep numbers.

4)The overpopulation of elk should be addressed in the preferred alternative with short term and long term solutions to reduce numbers of elk.

5)The elk are using the National Park as a refuge during the hunting season and the numbers will only continue to increase. It would not be unreasonable for the Great Sand Dunes National Park to make this new section of land a National Preserve Wilderness instead of a National Park Wilderness and provide means to manage wildlife. National Preserves allow hunting as a management tool where National Parks do not! None of the alternatives in the draft GMP/Wilderness Study/EIS for the Great Sand Dunes Park and Preserve address this issue through a National Preserve alternative. This plan must be rewritten.

COOPERATIVE PLANNING

1)On page 24 of the GMP it states, "The National Park Service will work closely with local, state, and federal agencies, and tribal governments whose programs affect, or are affected by, activities at Great Sand Dunes. Park managers will continue to work closely with the USFS, USFWS, Colorado State Parks, CDOW, and the Nature Conservancy to achieve mutual management goals. Park managers will also pursue cooperative regional planning whenever possible to involve the park in issues of regional concern." I believe the Great Sand Dunes National Park needs to take a step back in its planning process and start over with a joint planning process with all of the federal agencies that acquired land in the Baca purchase (NPS/USFWS/USFS) as well as some State agencies. Issues such as access, elk, noxious weeds, big horn sheep, deer, fish, water, vegetation, visitor use, and joint facilities don't stop at the park boundary. These three agencies must work together in a planning effort and not independently from one another. Pushing this GMP/Wilderness Study/EIS forward is not in the spirit of cooperation and is opposite of what is stated on page 24. Currently, this Draft plan/Wilderness Study/EIS will have negative impacts on neighboring public lands and working together with common planning goals can only improve social and ecological concerns.

Comment ID**2028****Mailing Information Comments****Comment Legistics Comments****Author Type**

Organization

Comment Type

formal letter

Comment

The Environmental Protection Agency (EPA) Region 8 has reviewed the Draft Environmental Impact Statement (DEIS) for the General Management Plan (GMP) and Wilderness Study for the Great Sand Dunes National Park and Preserve. The following comments are provided in accordance with our responsibilities and authorities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

The purpose of the plan is for this recently-designated National Park to manage its resources in a manner that will preserve them unimpaired for future generations, while also providing opportunities for visitor use and enjoyment. Some aspects of the Park Services s Preferred Alternative include recommendation for wilderness status for the northeastern portion of the Park known at the Dunefield Focus, and limiting access to the Big Spring and Little Spring areas to guided public access, while maintaining one existing visitor center as the main access route into the Park and Preserve.

Water Resources and Wetland Management: We concur with the Preferred Alternative presented in the GMP that if the Medano Ranch lands are transferred to the Park Service, surface irrigation for bison forage would be discontinued. Restoration of Sand, Big Spring, and Little Spring Creeks could be enhanced if the flow is allowed to remain within their natural drainage rather than being redirected to irrigate hay meadows. The elimination of the current irrigation practice could be designed to mimic pre-existing riparian conditions. We suggest the Final EIS further define the proposed study of this change in water flow management. The study should investigate whether other unimpaired stream(s) in a similar ecosystem could be identified and used to establish these management goals and objectives. We note that the proposed guided learning management zone is well suited to direct public access away from sensitive wetland areas. These sensitive areas could be compacted by foot traffic or result in the introduction of non-native plant species if a less controlled visitor plan were adopted for the ecologically fragile lands surrounding Big and Little Springs.

Vegetation Management: The Preferred Alternative presented in the GMP indicates that the Park Service would identify and manage normative plant species and possibly eliminate some nonnative plant stands. EPA supports this goal, as it is well recognized that nonnative species are a significant threat to maintaining sustainable ecological conditions. Methods used to control normative species include mechanical elimination, herbicide application or the introduction of beneficial insects. These controls are expensive and usually require repeated treatments over several seasons. EPA suggests that special attention be given to nonnative species in wetland and riparian areas, as these ecosystems are rare and highly valued by the visitor, Canadian thistle (*Cirsium arvense*), leafy spurge (*Euphorbia esula*), and whitetop (*Cardaria pubescans*) are perennial nonnative plants that can dominant wetland areas and exclude all native plant species. The Final EIS could provide further information about the available budget, methods, and priorities for controlling nonnative species on and adjacent to the Park and Preserve.

Elk Management: According to the Forest Service and the Colorado Division of Wildlife there is a significant overpopulation of elk in the Sangre de Cristo range with rapid habitat degradation in portions of the Sangre de Cristo Wilderness. Some recommendations provided by the Forest and DOW would eliminate the Dunefield Focus area from wilderness recommendation and make it a national preserve in order to allow public hunting or DOW-administered hazing to prevent concentration of elk. We recognize that the Park Service plans a 3-year study of elk management to study its options to resolve the problem of excessive numbers of elk in the Park and adjacent Forest lands. However, public hunting access, especially if were to include vehicular access, into the Dunefield Focus area could undermine the objective to maintain that area unimpaired for future generations. Risks to the ecosystem due to hunter vehicular access include the spread of nonnative plant species, increased wildfire risk, and risks to public safety. We think the Preferred Alternative which will provide a route across the Park for hunter access to Forest lands where hunting is permitted is appropriate, but not a significant factor in reducing the 6000 elk in the San Luis Valley herd to a sustainable level. Consequently, we concur with, the Park's intention to proceed with the Dunefield Focus Wilderness recommendation while the Park Service and DOW study means other than public hunting to control the elk herd size.

Tribal Consultation: In March 2005, the I-Hopi Tribe indicated to the Park Service that the 'lakes' situated within the dunes are important to the Tewa people living on the Hopi Reservation. We suggest the Final EIS present the results, if any, of the Park Service's and the Hopi Tribe's consultation process and whether the Preferred Alternative presented in the GMP would adversely impact these areas of importance to these native people. There may be opportunities for the visitors to the guided learning management zone which includes Big Spring and Little Spring areas to understand the historical cultural value of these resources to the Tewa culture.

EPA evaluates the potential effects of a Proposed Action and the adequacy of information in a Draft EIS. The Park Service's Preferred Alternative is rated by EPA as "LO" under EPA's rating criteria, which is enclosed. The "LO" rating means that our review has indicated a lack of objections to the proposed action. We do suggest that the Final EIS include additional information about the change in irrigation management on the Medano Ranch, priorities for nonnative plant species management, clarify the ecological risks associated with hunter access in the Dunefield Focus area in response to recommendations provided by the Colorado Division of Wildlife and the Forest Service, and

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summarize the results of tribal consultations, especially with the Hopi Tribe.

Weston Wilson of my staff has coordinated EPA's comments. He can be reached at the address above, by telephone at (303) 312-6562, or by e-mail at wilson.wes@epa.gov. Thank you in advance for considering our comments.

Comment ID
2029

Mailing Information Comments

Comment Legistics Comments

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Comment

Thank you for your letter of April 26th regarding the draft document as referenced above. After review of the document, the Comanche Nation has no immediate concerns or issues regarding the draft plan; however, please keep us informed of progress. We also would like to receive any further archaeological reports and a copy of the new plan when finalized. We look forward to your reports as planning proceed.

Comment ID

2030

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Comment

AS I MENTIONED LAST WEEK, I AM DEFINITELY AGAINST THE "WILDERNESS" DESIGNATION. THAT WORD ALONE MAKES AN AREA SUSCEPTIBLE TO CROWDING ONCE THE INFORMATION GOES OUT. LOOK AT SOME OF THE AREAS OUTSIDE OF SILVERTON. THEY NOT ONLY HAVE DESTROYED THE PEACE AND QUIET, THE WILDLIFE IS HABITUATED TO HUMANS TO THE EXTENT THEY COME RIGHT INTO CAMP. THERE ARE ENOUGH PROBLEMS WITH WILDLIFE WITHOUT OUR ADDING TO THEIR MISERY. THE GAME NEEDS TO BE MANAGED THROUGH HUNTING AND THAT WILL IN TURN KEEP OUT DISEASE. IF THE ELK, DEER, ETC. ARE ALLOWED TO HAUNT A SMALL TIGHT AREA, THAT IS UNNATURAL TO THEIR NATIVE NORMAL LIFE STYLE. THEY NATURALLY MIGRATE. HUMANS WERE HUNTERS LONG BEFORE THEY WERE CIVILIZED AND IT HELPED KEEP THINGS IN BALANCE. WE CAN'T GO BACK TO THAT BUT WE CAN KEEP FROM MAKING IT WORSE. DO 'NOT' DESIGNATE THE GREAT SAND DUNES AND PRESERVE AS WILDERNESS.

Comment ID
2031

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Comment

I am opposed to the wilderness designation, because it removes many of the management tools, particularly for the CDOW. However, I would like the Park Service to manage it as though it were wilderness.

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Kizzen Laki

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Comment

I support the recommended Draft GMP. I support Wilderness designation. I also support having a small trail head parking and camping area just south of the Baca Grande subdivision on the old Liberty Road. I think a small trailhead would provide good access to the north end of the National Park and would be a benefit to the Crestone community. A designated route to the trailhead would keep people from driving all over on private property. I think a small campground would be a nice addition the Crestone/Baca community. I do NOT want to see motorized access into the GRSA from the north--Crestone region. I think that most of the Park should be off limits to motorized vehicles.

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Rodney Bashaw

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Telephone#***Email******Comment***

This is in response to the Draft Great Sand Dunes National Park and Preserve General Management Plan. I have several concerns about your failure to address a northern access, specifically to the National Forest. This issue was brought to your attention early in your planning process but you have selectively decided not to adequately address this issue in your draft plan.

It appears that citizens of the United States that purchased the new portions of the National Park and National Forest are being denied access to hunt, ride horses, on National Forest Lands according to the draft plan. This needs to be addressed and resolved in the Great Sand Dunes National Park and Preserve General Management Plan.

I have enjoyed hunting and access to this area for years. Being able to access the National Forest without having to traveling 12 miles across the sand dunes from the National Park headquarters is important to me. I would like the freedom to hunt (carry a firearm to and from the National Forest) and carry harvested game from the National Forest without a special Park Service Permit through the Liberty Road. If this is not rewritten to address this issue my traditional hunt in this area will be forever changed. I fear the traditions, stories, and historic hunting experience that have been enjoyed though this access will not be able to be shared with my three upcoming hunting sons.

Your consideration in maintaining this access like in years prior to last, would be greatly appreciated.

Comment ID**2034****Mailing Information Comments****Comment Legistics Comments**

PEPC # 187847

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Comment

I would like to submit comments to the Draft Management Plan/Wilderness Study/EIS for Great Sand Dunes National Park and Preserve. Over the past 15 years I have made more than twenty trips into the former monument and surrounding backcountry. Like many, I have observed with keen interest the evolving plans for the multi-agency management of this region on the western flank of the Sangre de Cristo mountains. While there are many challenges within such a complex process, there are also many opportunities to accomplish something of real significance. I hope the National Park Service, in partnership with Fish and Wildlife, the Forest Service, and the Nature Conservancy, can craft a future for this area that coming generations will look upon with gratitude.

Each of the alternatives has aspects to commend it. In general, I would emphasize:

- Maximize wilderness designation. This is one of the scarcest "resources" on our public lands and, especially in conjunction with the proximate Sangre de Cristo Wilderness Area, would serve to make this area an important core area for the conservation of biodiversity, as well as a treasure to those who like to hunt, fish, and travel in wild nature.
- Do not allow dogs in the backcountry. Canines have a disproportionate effect on wildlife and it is impossible to enforce leash laws or other restrictions. Like in most National Parks, dogs should be restricted to leashes in the front country.
- The Medano Ranch might best serve as a learning center. Rather than attempting to restore this long-used ranch to some semblance of 'natural, it might be best utilized as a node where visitors could learn about the riches of the Park and Preserve.
- No new campgrounds should be built, especially on the north end of the area. While it may be necessary to expand some of the visitor services in the Park, new areas should not be constructed. Access from the north side is problematic for a number of reasons, but certainly, a campground is not warranted.

Once again I want to stress how critical it is to develop a multi-agency management plan which emphasizes the conservation and restoration of wild nature in the Park and Preserve. As Colorado and the semi-arid west continues to grow, there will be increasing demands on our public lands, and it is the responsibility of the Park Service and other public land agencies to honor their mandate and protect America's natural heritage.

A former Chief of the Forest Service, Michael Dombeck, wrote: "Values such as wilderness and roadless areas, clean water, protection of rare species, old growth forests, naturalness - these are the reasons most Americans cherish their public lands ... First and foremost, we must be loyal to a land ethic. In fifty years, we will not be remembered for the resources we developed, we will be thanked for those we maintained and restored for future generations."

These words apply to all who bear a responsibility for our lands and waters. I hope those responsible for the Great Sand Dunes National Park and Preserve and surrounding area will take them to heart.

Thank you for the opportunity to offer these comments.

Comment ID

2035

Name

Thomas Cleary

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L

Comment Legistics Comments

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web comment form

Telephone#**Email****Comment**

I am a resident of the Baca Grande Subdivision. I strongly support the Preferred Alternative. I particularly like the amount of wilderness protection balanced with the amount of access. I feel that for people to love and protect this valuable resource they must know it. The best way to know it is to experience it. I appreciate the sensitivity to concerns about access to the north through the subdivision. I live near the Baca entrance and would see many of these travelers; however I too think that park visitors will be a small part compared to general increase due to community growth. That said I appreciate the openness to hear the community voice as it develops with the help of the sonoran institute. Additionally I like the preferred alternative because it is considered to be the environmental preferred alternative. I do not like the 3 Node alternative because of the lack of wilderness protection. I do not like the Dunefield Focus due to lack of access. Whatever the access route, I strongly support a trailhead at the mountain front, e.g. Liberty Rd @ Deadman. Alpine camp is too low and people will continue to use the gate at the N end of Liberty rd where parking is an issue.

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John Gibson

Mailing List***Mailing Information Comments******Organization Name******Local***

NL, in-state

Comment Legistics Comments

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Comment

As an avid outdoorsman, I am in favor of a north access point to the Rio Grande National Forest East of the Sand Dunes. I have been hiking/backpacking/fishing/hunting in the Sangre de Cristo range for almost 20 years.

I know that there are many agencies working together to come up with a reasonable solution to the access issue on the North end. With the proper set-up and communication, I think there will actually be less impact to the environment of the Park, and the surrounding community with a North entrance.

What are the options for a North Entrance? Well, I could support even a new section of road that is on the forest service land, not part of the management of the Park Service.

Comment ID**2037****Name**

Richard Malstrom

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O of S

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Comment

I am concerned about your management plan and it's approach to stop hunting on National Forest Lands. In my lifetime I have enjoyed my National Forests more than my National Parks because I have been able to hunt on National Forest Lands.

It seems to me that the National Parks, through misrepresentation of the dispersal of these lands to limit or stop the use of hunting altogether, one has to think, what is your main prerogative? To limit hunting access to National Forest Land? People have the right to bear arms and limiting access to National Forest Lands by using .07 mile of road to block that access should be revisited by congress. Whoever drew the boundary lines of the National Park should be held responsible for blocking and controlling public access and should be put in front of a congressional hearing for this unethical act.

I don't care how you propose to manage to National Park Lands but I do care how you propose to manage National Forest Lands. Elk management and Access to the National Forest are main issues that have been neglected in your plan and it must be rewritten to adequately address them.

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PEPC # 187656

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Comment

My first comment on the Draft EIS has to do with access to the northern area of the park immediately south of the Baca Grande Estates and access to the newly added portion of the Rio Grande National Forest. It is my understanding that the original park boundary was supposed to be the Liberty road. But access is now restricted because the northern 0.7 mile of that road was included in the park. It restricts access to hunter and other legitimate users of that area of the Rio Grande NF. Blocking the access also limits the options the Rio Grande NF would have in its NEPA and planning process for the new portion of the Forest. Restricting access also in effect creates another de facto park.

My second comment addresses the issue of the over-population of elk in the area. There are so many elk that they are damaging the vegetative resources, especially the willows, in some of the drainages in the new Rio Grande NF tract. It's the same situation that Rocky Mountain NP is now facing. The Colorado DOW has been trying to address the problem through new hunting seasons and game management units. When hunting season arrives, the elk will move into the park and into the new National Forest tract. Since access along the Liberty road is restricted, most of the hunters going into that area will be on foot. The result will be that fewer elk will be harvested, thus having very little effect on the population. If the numbers of elk are not controlled, the elk will not only destroy the vegetation on the Forest tract, but will damage the resources on the park.

I urge you to consider providing public vehicle access through the northern part of the park to the new Forest tract. The sandy soils would limit the numbers of people who could access the area.

Thank you for considering my comments.

Comment ID**2039****Name**

Vernon Mizner

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Comment

I strongly support the Dunefield focus/maximize wilderness alternative. My main concern is that the Liberty road will become open to public motorized vehicle access. This I strongly oppose. We already have vehicle access to the south end of this very unique dune mass. If the Liberty road is opened, we will miss an extremely unique opportunity to preserve the entire north end of the dune mass for non-motorized use only. I have been throughout this northern area of the park expansion area and it is utterly special in its qualities of quiet, vastness, the dunes and the coming together of many different habitat types (dunefield, dune mass, wetlands, mountain front, riparian corridors and vast grasslands). It would be a shame and a travesty to remove the one protection this area has now, its very inaccessibility due to no motorized vehicle use (in the past by nature of its being in private ownership and therefore, conservative vehicle use, this was a defacto wilderness setting). Please think for the long view; it is very difficult to restore wilderness character once it has been opened to public motorized vehicle access. Again, we already have ample access on the south end. Let's not miss this opportunity!

If the NPS preferred alternative would guarantee no motorized vehicle access beyond a new trailhead, thus prohibiting vehicles on Liberty Road in perpetuity, I would support that alternative. Since it does not, I must support the most protective alternative, the Dunefield focus/maximize Wilderness alternative. Thank you.

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John Vickery

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formal letter

Telephone#**Email****Comment**

I provide comments about two issues, campgrounds and pets/dogs. For the most part, I will not refer to the four proposed management plan options, rather I just offer my preferences.

Campgrounds: The present camping alternatives are not satisfactory. I am aware of the large, developed campground NE of the visitor center (Pinyon Flats) and the small, primitive, AWD accessible only further to the north and next to the stream along the eastern edge of the dune field. My experience at Pinyon Flats two years ago was not good—loud motor vehicles, barking dogs, electric generators.

My preference is for multiple campgrounds of varying types:

primitive vs. developed; AWD accessible vs. ordinary vehicle accessible; car camping vs. hike in a short distance; tent only/quite vs. RV/noisy; dog free vs. dogs allowed (I prefer that dogs be prohibited from the entire park)

For my own use I prefer: car camping, accessible by ordinary vehicle, tent only (plus truck bed camper, van) quiet, dog free, and either primitive or semi-developed.

I strongly recommend that the proposed NW entrance have a campground (per three public nodes option). Likewise, there should someday be a campground at Medano Ranch headquarters area (and/or near—but not next to—Big and Little spring creeks) and a campground for those participating in the activities in the Guided Learning area (perhaps in the Medano Ranch Hdqtrs. Area) or the western access (via Medano Ranch hdqtrs.) to the Guided Learning area.

Dogs Dog owners already have plenty of public property options for their dogs—most public parks and open spaces allow dogs. When I go to a public place, I do not want to have any interactions with dogs. I already have too many interactions with dogs—interactions that I do not find desirable—barking, aggressive behavior, feces, etc. Please, keep our national parks free of dogs. It is not enough to require owners to keep dogs in their cars—they will not observe this requirement. It is not enough to require a leash—the owners will not observe this requirement whenever they think they can get away with it.

Congratulations on the Management Plan development process thus far. I look forward to the Final Plan.

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2041

Mailing Information Comments

Comment Legistics Comments

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Comment

We have been coming here for the past 20 years in the spring and fall. It is one of the most beautiful spots in Colorado. Now that the Great Sand Dunes has become a National Park please do not change the rule that allows dogs in the back country. We love hiking the back country with our dog. Your park employees have been great! Keep up the great job.

Comment ID**2042****Name**

John Rawinski

Mailing List**Mailing Information Comments****Organization Name****Local**

L

Comment Legistics Comments**Street Address****City****State****Zip**

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CO

81144

Author Type

Individual

Comment Type

formal letter

Telephone#**Email****Comment**

I appreciate the opportunity to comment on the Management Plan and DEIS for the Great Sand Dunes National Park and Preserve. As frequent visitors to the Park, my family and I have always appreciated the beauty and unique experiences the Park offers.

I have a number of concerns about the Plan however and would like you to consider them in the Final Impact Statement and Management Plan. I write you as a sportsman, hiker, backpacker, and birder. I also am writing from the perspective of soil scientist and ecosystem classification specialist. I have hiked and backpacked extensively in the Great Sand Dunes Park and Preserve. I was leader of the soil/ecosystem classification efforts on the former Rio Grande Forest portion, now included in the Preserve. My experience with the soils, landforms, vegetation and birdlife has been first hand.

1) THE IDENTIFICATION AND ECOSYSTEM CLASSIFICATION SYSTEM USED IN THE DEIS ARE INADEQUATE TO DESCRIBE AFFECTED RESOURCES.

On page DEIS 90, there is a description of Vegetation and the 7 life zones as described by Nature Serve 2005. This does not appear to be an ecosystem classification system as defined by the National Hierarchy of Ecological Classification, or similar system. Ecosystem classification systems are usually composed of an abiotic and a biotic nomenclature. Moreover, the DEIS does not quantify the proposed systems (sabkha etc) so the reader has no idea how much of what systems you have. Simple descriptions are inadequate if there is no mapped resources to accompany those descriptions. Without mapped areas, you cannot quantify affected ecosystems accordingly. You also are unable to use important management implications of those ecosystems.

The soil surveys that apply to your area are the best "ecological units" available and can easily be quantified. In addition to soil types, potential vegetation is described as well as landforms, geology and climate. The three applicable surveys include Alamosa County, Saguache County, and the Sangre de Cristo Soil and Ecological Resource Inventory, 2006. All of these surveys have been digitized and can easily be analyzed in a GIS environment. They all have map unit descriptions which contain important management interpretations. Alamosa and Saguache County digitized surveys are available at the Natural Resource and Conservation Service. The Sangre de Cristo inventory is available from the USFS Rio Grande National Forest in Monte Vista, Colorado. For planning purposes, you may want to lump similar ecosystems. Range site classifications are a good tool for making broad interpretations for grassland ecosystems. For forests, you can lump similar forest zones like Engelmann Spruce zone units, Douglas-fir units etc. This would reduce the many map units into a few units that would be useful for planning.

DEIS Page 114 similarly is inadequate in that soils data for the entire Preserve portion is lacking in the analysis. This data and mapping is available to the general public as described earlier. You need to present a comprehensive table of soil types or groups of soil types so management interpretations can be presented.

CORRECTION IS NEEDED ON PAGE 71 REGARDING OFF HIGHWAY VEHICLE USE

On page 71 1st paragraph, (2) states that "off-highway vehicle use west of Medano Pass was formerly allowed, before the area became part of the National Preserve.

Comment: This statement is not true. With the 1996 Rio Grande National Forest Plan, all travel was restricted to designated roads and trails. There were no areas designated as "open". What may confuse your perception is that dispersed camping is allowed within 300 feet of an existing road according to FS special orders. The FS does this to allow reasonable dispersed camping opportunities. Because this is a narrow alluvial drainage, it was natural that the few dispersed campsites got used perennially and this was legal. So what looks like open travel was not and some of the trail use met FS travel rules.

There was illegal off-road travel as well, and the FS made numerous efforts to restrict travel and keep vehicles on roads. Unfortunately, enforcement was difficult and damages to soil, watersheds and streams did occur. You need to eliminate the statement that travel was "open" prior to the preserve. It never was open.

TABLE 4, SPECIAL STATUS PLANT AND ANIMAL SPECIES NEEDS CORRECTION

Regarding Yellow-billed Cuckoo, the table reports "Not found in or near Park". In 1984, there was a report of a Yellow-billed Cuckoo at the Sand Dunes. Also, I don't know if

Wednesday, July 11, 2007

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these observations qualify as "near the Dunes" but, a bird survey crew reported an audible call that was heard in 06-2003 at McIntyre-Simpson property, east of La Jara. Subsequently, two birds were seen at that location.

LIFE ZONES DESCRIBED IN THE DEIS NEED CORRECTIONS.

DEIS Page 113 describes the aggregated Pinyon and Juniper to Montane Zone as 8,000 to 9,500 feet. The Sangre de Cristo Soil and Ecological Inventory shows the Montane Zone (dominated by Douglas fir, ponderosa, white fir and aspen communities), occurs normally to about 10,400 elevation. The Subalpine zone, dominated by Engelmann Spruce occurs from 10,400 to 11,400. The alpine zone occurs from 11,400 to the highest peaks of the Sangre Mountain range. The DEIS needs to reexamine these zone descriptions and make necessary changes.

DEIS page 113. The bird names need to be consistent with the American Ornithological Union nomenclature and should be singular. As such, Western Tanager, Chipping Sparrow, Northern Goshawk. ...should be listed under each lifezone. etc.

DEIS page 114 first paragraph...should read White-tailed Ptarmigan.

THE ELK POPULATION IN THE PARK AND PRESERVE IS EXPANDING AND UNNATURAL. MOTORIZED FACILITATION OF CONTROL METHODS WILL BE NECESSARY

A herd of 6,000 elk have established themselves in the locality of the Park, new Refuge, and new National Forest. Because of a lack of natural predators AND the fact that the general public cannot reasonably hunt them, this herd is destined to grow even larger. The stage is being set for another government hunter annihilation of the herd, which will cost huge sums. The irony in this is that hunters would help trim the population and pay for the privilege to do so.

Blocking the general public from the Liberty Road does not facilitate herd reduction. Neither does making huge acreages Wilderness within the Park, since once the government herd reduction begins, you will need motorized access to process and salvage tons of elk meat by use of motor vehicles. The situation needs a rational solution, and the preferred alternative only allows further elk herd increases. Facilitating hunting near the Park would be a step in the right direction.

THE DEIS AND ANALYSIS ARE~ FLAWED BECAUSE THEY FAIL TO ADDRESS ONE OF THE KEY ISSUES RAISED BY THE PUBLIC CONCERNING MOTORIZED PUBLIC ACCESS TO THE NORTH PART OF THE PARK.

In spite of numerous public and agency letters specifically identifying this issue, the Park Service has chosen to ignore this issue by deferring analysis to another agency or future analysis. Ignoring a key issue is a violation of the National Environmental Policy Act (NEPA), which requires identification of key issues. NEPA also requires that key issues drive alternative development and analysis. Astoundingly, the Park ignores this and gives it minor focus, when this issue could be one of the most significant of all that you need to address in the Park plan. You cannot effectively allocate land to a management prescription in the north end without examining access issues and alternatives. This is true for all three alternatives considered in detail. The Park cannot assure the public of having a complete and comprehensive plan until you address this key issue.

PUBLIC MOTORIZED ACCESS NEEDS TO BE ALLOWED FOR GENERAL PUBLIC ENTRY ACROSS THE 0.7 MILE NPS LAND SO THAT THE PUBLIC CAN ACCESS THEIR NATIONAL FOREST LANDS. Public Access to the North End of the Park needs to be available to motorized entry in a portion of the lands. Motorized uses affect a very small portion of the Park and this is essentially a good choice. I do not favor unlimited motorized access in any part of the Park, but I do think it is reasonable to allow motorized access in the north part via the Liberty Road across the 0.7 miles of Park lands drawn across the Liberty Road. It is not fair to the general public that they are kept away from newly-acquired National Forest lands where they wish to recreate.

I realize the Park is concerned with uncontrolled motorized access in the north part of the Park. As a compromise, why not keep the Liberty Road limited to foot travel in most times of the year, but allow motorized use during the big game hunting seasons, like September 1 through December 30th. This way an increasing elk herd can be trimmed and reasonably removed from the area. It would keep the rest of the area free of motorized use during winter and the rest of the year.

Your DEIS erroneously diminishes the elk harvest of 30 animals a year and concludes that hunting would not make much difference in the herd. Considering how difficult it has been to get into areas across the Park, the harvest would be an order of magnitude better if reasonable motorized access was allowed. It still may not solve the elk problem but would be a step in the right direction to trim the herd.

I FAVOR A ~ THREE PUBLIC NODE ALTERNATIVE.

With more than half of the Park and Preserve now in designated Wilderness, it seems to me best to retain more management flexibility in the remaining lands. The Three Node Alternative does this, while still protecting valuable resources and the primitive experience. The Medano Ranch and guided learning sounds like an excellent way to

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Michael Rees

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Comment

I would like to rescind the comment I mailed yesterday on the GRSA GMP/EIS. I was mistaken about the alternatives and need to correct what I said. So please disregard my earlier message. I support the NPS preferred alternative and the wilderness it proposes. As I noted in my earlier message, Designated wilderness is a scarce landscape in Colorado, the US, and the world. With the likely increase in the state's population over time, there will be fewer and fewer such areas left both in CO and the US for people to enjoy and appreciate - not to mention the plant and animal species that depend on wild areas. Designating wilderness in the GRSA NP will in the long run provide Americans and others who come to visit the area with an opportunity they will not be able to find elsewhere.

<i>Comment ID</i> 2044		<i>Name</i> Bob		<i>Mailing List</i>	
<i>Mailing Information Comments</i>		<i>Organization Name</i>		<i>Local</i>	
<i>Comment Legistics Comments</i>		<i>Street Address</i>		<i>City</i>	<i>State Zip</i>
<i>Author Type</i> Individual	<i>Comment Type</i> email	<i>Telephone#</i>	<i>Email</i> robtogburn@aol.com		
<i>Comment</i> One of the hardest things to do when putting a book together is the preparation of a comprehensive and accurate index. I know. I've done it.					
I am probably quibbling, but as a retiree, I have nothing better to do -- so here goes!					
The indexing of Great Sand Dunes Advisory Council is wrong. I suspect the indexing was assigned to a detail person, but one who was not intimately familiar with the subject matter, or was tired, or underpaid. Whatever.					
Lumped in with the Great Sand Dunes Advisory Council are references to the "Advisory Council on Historic Preservation," an entirely different entity. I suspect the index researcher saw "advisory council," and assumed all such references were to the same entity. If you want to index the Advisory Council on Historic Preservation the page references are: 75,174, 21-214, 304. The page references to the Great Sand Dunes Advisory Council are: 6,7,11,13,32,41, 301-303, 323-324, 336, 343, 369, 370. The indexer missed 324, 336 & 343.					
One other quibble, and I'll quit. I don't believe "The Nature Conservancy" should be indexed under "I." It should be under "N." Drop "The" or write it as follows: Nature Conservancy, The. Or under "N" do it as they do it in the TV guide listing of movies: The Nature Conservancy*~* LNV.					
I leave it to others to ferret out other minutiae.					

Comment ID

2045

Name

Mailing List

Mailing Information Comments

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Local

Comment Legistics Comments

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State

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Form letter sent by numerous WS members via email

Author Type

Comment Type

Telephone#

Email

Organization

email

Comment

I commend the proposal in your draft management plan's preferred alternative to add nearly 51,000 acres of wilderness to Great Sand Dunes National Park and Preserve. Wilderness will help protect the park's oldest archaeological sites, its endemic species and the renewal process for the very dunes for which the park is named. Wilderness will also help ensure that future generations may continue to enjoy the park's solitude, quiet, and quite astonishing range of landforms and species.

Having said that, I strongly urge you to add sand sheet lands in the northwest corner of the park to your wilderness proposal. Only one gravel road separates them from other deserving wilderness. Wilderness protection becomes increasingly important given that you propose this area as a backcountry access zone: please recommend wilderness protection for lands not slated for access roads and parking lots if such structures are necessary.

Please also propose wilderness protection for wilderness-quality lands surrounding Medano Ranch. The sabhka, a fundamental park resource, is underrepresented in the wilderness proposal, and unimproved two-track roads should not disqualify these lands (those not occupied by ranch buildings, the administrative access road and Closed Basin Water Project facilities) from wilderness protection.

To the extent possible, please minimize roads and parking lots within the park and try to locate new motorized access outside the park, primarily on existing roads, through cooperative agreements with other governmental agencies and relevant entities. Please direct trails and visitor use away from sensitive riparian zones, such as the Deadman Creek corridor, and please note that I very much believe that motorized and mechanized travel are inappropriate in the park's backcountry.

I very much favor restricted access to the park's sensitive archaeological sites and, in aid of that, I urge the Park Service to conduct archaeological surveys on all park lands as soon as possible.

Finally, I strongly urge you to expedite the purchase of subsurface mineral rights to protect the park from energy-related intrusions.

Thank you for considering my comments.

Comment ID
2046

Name
James Swaney

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Comment

Your draft management plan for Colorado's Great Sand Dunes has many good features, but more wilderness protection is called for in order to protect critters, historic sites, and the wild beauty and soltitude for future generations. In addition, mineral rights should be acquired (or condemned) in order to prevent the intrusion of energy industry interests into this unique area.

Wilderness designation should be extended to include the area around Medano Ranch and the northwest part of the park.

Additional roads and parking lots within the park should not be constructed; rather, a shuttle system such as that at Zion or Rocky Mtn NP should be devised for peak season.

Comment ID
2048

Name
John J.B. Miller

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Mailing Information Comments

Organization Name

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Comment Legistics Comments

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Comment

In 1962, when I was working for the National Park Service at the Omaha Regional Office, I visited what was then Great Sand Dunes National Monument and spoke with the Superintendent. I was then a GS-9 and so was he, even though he was about 20 years older than me. I marveled at the lonely isolation of the place, but he said that if only they could get more visitors, the superintendency would qualify for a higher civil-service rating. I'm sorry he felt that way!

To the extent possible, please minimize roads and parking lots within the park and try to locate new motorized access outside the park, primarily on existing roads, through cooperative agreements with other governmental agencies and relevant entities. Please direct trails and visitor use away from sensitive riparian zones, such as the Deadman Creek corridor, and please note that I very much believe that motorized and mechanized travel are inappropriate in the park's backcountry.

I very much favor restricted access to the park's sensitive archaeological sites and, in aid of that, I urge the Park Service to conduct archaeological surveys on all park lands as soon as possible.

Finally, I strongly urge you to expedite the purchase of subsurface mineral rights to protect the park from energy-related intrusions.

Comment ID**2049*****Mailing Information Comments******Comment Legistics Comments******Author Type***

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Comment

Please continue to consider pack and saddle stock travel as an alternative means to visit and view this unique place. It is a great opportunity to provide access to those who are physically unable to hike into the backcountry areas of the park and to preserve an important part of America's heritage.

Comment ID
2050

Mailing Information Comments

Comment Legistics Comments
PEPC # 187869

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81101

Comment

I am opposed to the wilderness designation, because it removes many of the management tools, particularly for the CDOW. However, I would like the Park Service to manage it as though it were wilderness.

Comment ID**2051****Name**

Thomas Goodwin

Mailing List**Mailing Information Comments****Organization Name****Local**

L

Comment Legistics Comments

PEPC # 187913

Street Address

25245 County Road 61

City

Moffat

State

CO

Zip

81143

Author Type

Individual

Comment Type

web comment form

Telephone#**Email****Comment**

I am disappointed that you are not addressing key issues that were brought up before the legislation, early in the planning process and repeatedly raised since then.

The National Park, as well as the National Forest [that surrounds the Park], have been established for the benefit of the American people, who have paid the bills for same via hard earned taxes. Public access to both the Park and the National Forest is critical in this case. In reading over the rough draft, it seems that the Park Service has embarked on a mission to do all it can to restrict public access to the National Forest for hiking, hunting, and horseback activities that are allowed on public land. All the way through the plan you talk about cooperating with other agencies and yet you have repeatedly ignored input from other agencies. The Forest Service and DOW both wrote letters expressing their concern and you have ignored the input from both letters. Elk and access have been identified as key issues and yet they are not addressed in the plan. Park service has a history of being a poor neighbor and not dealing with elk issues. Just look at how Rocky Mountain National Park has created problems for their neighbors. The San Luis Valley can not afford Park Service to not work with the Forest Service and the DOW on the access and elk issue. One of the recommendations was for the Park to propose the new Baca portion as a preserve so the public can hunt the elk. Even though this requires congressional approval it is just as valid as proposing wilderness which also requires congressional approval. Having Park rangers slaughter elk is not a good option. Providing for public hunting makes sense.

The public should have unrestricted access through the park on the liberty road. This should be part of all of your alternatives. Blocking public vehicle access across .7 of a mile of National Park jurisdiction from a county road should never be allowed to happen. It is inappropriate for the park to manage National Forest activities and mission by blocking access. It is important that the public have unrestricted vehicle access across the .7 mile of Park on the liberty road in your preferred alternative. Any other access road can be added if and when it is developed.

Comment ID**2052****Name**

Various

Mailing List**Mailing Information Comments****Organization Name****Local**

L

Comment Legistics Comments

Sent by multiple Individuals in PEPC

Street Address**City**

Crestone

State

CO

Zip

81131

Author Type

Individual

Comment Type

web comment form

Telephone#**Email****Comment**

[Sent by multiple Individuals: Lee Temple, Ji-hau Fan, Shu-ju Cheng, Carol DeAntoni, T. Suomi, Christine Myers, Sandra Hammond, Lisa Micklin, Yolan Presley, Kimberly Bryant, Adrienne Harris, and Christina Cabeza]

I am sending you a copy of my comments on the draft "General Management Plan! Wilderness Study! Environmental Impact Study" for the Great Sand Dunes National Park and Preserve".

Bringing more visitors through my community does not "provide long-term protection of. the geological, hydrological, ecological, scenic, scientific, cultural, wilderness, educational, wildlife, and recreational resources of the area" and does not "Preserve the remarkable biodiversity evident in the landscape from the valley floor to the mountain crest". (Quotes from draft plan on the Park Purpose.) In particular the fire hazard and non-native plant introduction will impact us ecologically. The noise, traffic, litter and crime will impact us culturally and irreparably change the beauty and flavor of our community. Let the backcountry hikers access the northern area of the Sand Dunes Park and the adjacent Forest Service land through the development of existing roads in the Great Sand Dunes National Park.

Our community is small, quiet and slow with many spiritual retreat centers clustered on the eastern border (near US Forest Service land).

Our area has experienced an extended drought increasing the fire danger to a very critical condition. Visitors tend to be unaware of the danger and careless with fire. We have spent years educating our community on fire danger to reduce the threat of a catastrophic wildfire. We will not have that opportunity with one-day visitors.

The proposed 'joint visitor contact station' is mentioned on the top of the second column on page 58 of the General Management Plan Proposal! Wilderness Study. Any visitor contact station attracts more visitors and traffic and will tax our small, privately-funded emergency services. The road where the old Baca Ranch headquarters is located goes nowhere but to our town and to hiking trails on Forest Service lands with limited access and parking. Put the visitor center on State Highway 17, not on County Road T.

Use Your Own Roads:

In the plan on page 64; "Alpine Camp, located in the northwest portion of the park, would serve as a backcountry patrol cabin for NPS administrative purposes; there would be a couple of options for administrative access to this site." (Emphasis added.) Then why

can't the visitors use those options also? Maps included in the plans do not show existing Sand Dunes road access to the north park area, and the Baca Wildlife Refuge will not be granting access as this would conflict with their federal mandate. If the Sand Dunes and the Forest Service want access for the public then they should use their own roads. I do not want more traffic to our quiet community because they don't want to develop their own roads. If you can't afford the roads then don't invite the public in. ALL references to a "back-country access zone in the "preferred alternative" should be removed.

The Forest Service Connection:

I have heard that it is really the Forest Service driving the whole North Entrance issue. Here are some perspectives to consider:

In a deal made outside the public comment arena, the Sand Dunes granted access to the US Forest Service through a gate "at the north park boundary at Camino Real and Liberty Road". On page 62 the plan states that "if no public vehicle access to the north part of the

park could be found over the long term so that trailering horses into the north part of the park was not possible, the National Park Service would provide gates for horses [access to Forest Service land] at the north park boundary at Camino Real and Liberty Road." The road to the gate can only be accessed through our community. Although this issue will probably be included in the Forest Services management plan

which has not been drafted yet, you can see that decisions are already being made without public comment. Jim Jaminet of the US Forest Service has said he gets calls every day from people asking when access to the forest will be open. I suspect the calls are from hunters. I don't want hunters shooting into our subdivision and ruining our peace. The eastern edge of our community is made up of spiritual retreat centers. Hunting sounds, even for only 15 days a year would impair our "quiet" and jeopardize our

Wednesday, July 11, 2007

Page 70 of 87

safety. JJaminet@FS.fed.us (Nothing against hunting, just too close!)

The weeds imported by horses and trailers will not “Preserve the remarkable biodiversity evident in the landscape from the valley floor to the mountain crest” (p.9, Sand Dunes Park Purpose.) Noxious weed control is an impossible feat and destroys fragile ecosystems. If they allow horses the manure must be collected and removed and cars must drive through an herbicide to enter the park. This could limit the poisoning of our fragile land to a few select areas rather than have an inadequate weed control program “wherever the invasive species are found”.

The fuel load on the adjacent Forest Service land supports a high-intensity fire and our fire department is not ready to respond and neither are they (the Sand Dunes has one fire vehicle that roves from here to the south San Luis Valley, and the Forest Service has one engine in Saguache county). If they want to have more campers and hikers

Comment ID**2053*****Name***

Cindy Beaver

Mailing List***Mailing Information Comments******Organization Name******Local***

L

Comment Legistics Comments***Street Address******City******State******Zip***

PEPC #187911

PO Box 1044

Crestone

CO

81131

Author Type***Comment Type******Telephone#******Email***

Individual

web comment form

Comment

1) I oppose a "joint visitor contact station" on County Rd T (near the Baca Ranch entrance). 2) I oppose horses and cars for the weeds they bring. 3) I oppose hunting within a certain area to protect our community's safety, peace, and quiet. 4) I oppose encouraging more visitors who bring fire to the unmitigated national forest (and traffic, trash, crime, and noise). 5) I am for using existing Sand Dunes roads for access, not ours. 6) ALL references to a "back-country access zone in the "preferred alternative" should be removed. 7) Support the recommended Wilderness Designation of 51,000 acres.

Comment ID**2054*****Mailing Information Comments******Comment Legistics Comments***

PEPC # 187910

Author Type

Individual

Comment Type

web comment form

Name

Janice N. Swarm

Organization Name

Rocky Mtn Bockcountry Horsemen

Street Address

1402 1/2 Sherman Ave

Telephone#***City***

Canon City

Email

thejswarms@piopc.net

Mailing List***Local***

NL, in-state

State

CO

Zip

81212

Comment

After attending meetings on the Great Sand Dunes, it is my recommendation that plans proceed as presented. I do highly recommend that the road through Baca Grande Subdivision into the Park be approved and that a parking area be provided to all visitors to the North area of the Park. With so many acres and area, additional parking areas will be needed to accommodate the many visitors that will be visiting in the future. The growth in the Front Range and visitors from across the country will be coming.

Comment ID
2055

Mailing Information Comments

Comment Legistics Comments
PEPC # 187907

Author Type
Individual

Comment Type
web comment form

Name
Steve Ket

Organization Name

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11170 Peaceful Valley Rd

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steveket@earthlink.net

Mailing List

Local
NL, in-state

State
CO

Zip
80925

Comment

The issue of access to a section of the National park being blocked because the Baca Development has gathered a good number of signatures stating they don't want access through that development when the access is a county maintained road should not even be an issue. I am an outdoorsman, equestrian, hunter, fisherman, and taxpayer. No private development should be allowed to block access over public roadways. In addition I would request forward movement on parking in the area for park access to include adequate area for horse trailers. Please don't look at this from the number of signatures on a petition initiated by people in this development. Everyone in the development would be happy to sign a petition to reduce traffic in their development. However they don't own the park or the roads. In relation to those that this decision would effect (park users), hardly anyone even knows such a decision is being made. Please make any and all decisions on this matter in favor of the general public, not private development.

Comment ID**2056****Name**

Charles R. Warren

Mailing List**Mailing Information Comments****Organization Name****Local**

L

Comment Legistics Comments

PEPC # 187904, Associated with: Baca Grande, Crestone
Charter School, Baca Grande VFD, Kundalini Fire Management

Street Address

1619 Willow Creek Way, PO Box 613

City

Crestone

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81131

Author Type

Individual

Comment Type

web comment form

Telephone#**Email**

cwarren@ctelco.net

Comment

I have several comments on the General Management Plan for the Great Sand Dunes

National Park and Preserve.

1. Please do not encourage or support access to the GSDNP by way of Camino Real or other roads through the Baca Grande Subdivision. They all go right by my house and there is already too much traffic. Any additional would de-value my home. Access by four-wheel drive vehicles on a primitive road through the park from Co Rd T or Rte 17 would be plenty of access for responsible backcountry explorers.

2. The diversity of the park would be greatly enhanced by the introduction of the Gray Wolf to the ecosystem ala Yellowstone, Idaho etc. This has been a great success in Idaho, Wyoming and Montana and the resultant cascade effect has restored the true wildness of those areas in only ten years. The wolf was a native here years ago and will help control populations of elk, coyote and rodents - all critically out of balance now.

3. Please make sure horses are cleaned up after and vehicles are sprayed with herbicides. These will help limit the introduction of noxious weeds and other undesirable neighbors.

4. Please put the visitor's center out past the Baca Ranch access so people know the right way to go to get to the park.

5. Please include area schools including Crestone Charter School, Moffat, Mountain Valley, Sangre de Cristo, Center, and Adams State College in your research agenda. These schools have outdoor education plans and active science education programs.

6. Please do not allow fire to be brought in with campers except in small stoves. Years of fire suppression have left the area vulnerable to a catastrophic high-intensity wildfire. All campers should be required to adhere to the strictest leave no trace" principles in the backcountry. This is well established in other parks like Yellowstone. Back country access should be limited by a permit system so backcountry campers seldom encounter each other. Any fire in the backcountry of the GSD will affect our community. Our small VFD and agencies in the Valley are not capable of fire suppression coming to us from the park.

7. Please limit vehicle access to no further than 1 mile from either County Rd T or Rte 17. AND not through the subdivision. Car exhaust systems can start fires and their wheels will destroy the fragile soils of the park. Make designated parking lots for this purpose at several spots like the old Baca Ranch or Medano Ranch.

8. Release the Bison to roam the park along with the release of wolves. They were also here before us.

9. Please use customary national park patrolling procedures to enforce backcountry permits and fishing.

10. NO Hunting within 10 miles of the subdivision. High powered rifle ammunition is a threat to our children, our bodies, and our peace. If possible, I would support a no hunting policy in the park altogether. Wolves, cougars and other predators can balance the ecosystem if you support them.

11. I support the Wilderness designation of 51,000 acres of the park.

Thank you for the opportunity to comment.

Comment ID**2057****Mailing Information Comments****Comment Legistics Comments**

PEPC # 187891

Author Type

Individual

Comment Type

web comment form

Name

Christine Canaly

Organization Name**Street Address**

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Telephone#**City**

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slvwater@ctelco.net

Mailing List**Local**

L

State

CO

Zip

81131

Comment

I support the 51,000 acres of recommended wilderness designation. It is important to protect this landscape for future generations. I also have concerns about off-road vehicle use in the Park and encourage the Park to work with surrounding agencies to make sure this remarkable area maintains its quiet use characteristics, even so far as recommending a non-motorized hunting season for surrounding public lands. Also, I hope the Park recommends wilderness designation for the Forest Service Mountain tract, adjacent to the Park, Finally, I would like to see a shared responsibility with access through Fish and Wildlife Service for entrance into the Park, doing a time share with the Baca Grande subdivision. The subdivision absorbs public access January through mid-August, and Fish and Wildlife Service absorbs public access during the critical hunting season portion of the year, which is the least compatible use with the subdivision. The subdivision could absorb public flow during the critical Spring bird nesting season and take pressure off the wetlands. The Refuge could absorb the hunting season, which they are much more capable of dealing with, especially since hunting is already allowed on their property. Please do not succumb to Forest Service pressure for "unencumbered access" on the Liberty Road, it is important for many reason that the Park Service take responsibility for "Administrative Access" on Liberty Road. Forest Service will not have the resources to manage the road that is developed from that entrance.

Lastly, I too would like to advocate to make Lexam mineral resources a purchase priority for all three federal agencies. Threat to development or development itself could ruin this outstanding natural resource shared by three federal agencies on behalf of present and future public.

Comment ID**2058*****Name***

John P. Tembrock

Mailing List***Mailing Information Comments******Organization Name******Local***

L

Comment Legistics Comments***Street Address******City******State******Zip***

PEPC # 187872

946 Portage O.L.

Crestone

CO

81131

Author Type

Individual

Comment Type

web comment form

Telephone#***Email***

jtembrock@soltactic.com

Comment

I am strongly in favor of the plan to designate 51,000 acres as Wilderness. This is a unique and sensitive terrain and ecosystem. It deserves the highest level of protection. Thank you for your time.

Comment ID**2059****Name**

Amanda Woodward

Mailing List**Mailing Information Comments****Organization Name****Local**

L

Comment Legistics Comments

PEPC # 187873

Street Address

PO Box 1183

City

Crestone

State

CO

Zip

81131

Author Type

Individual

Comment Type

web comment form

Telephone#**Email**

awoodward@soltactic.com

Comment

I strongly support the recommended Wilderness Designation, 51,000 acres, for the Great Sand Dunes National Park. I strongly disprove of two unique paths through the Baca Grande subdivision for access to the National Park and the National Forest. If the elk warrant a coordinated three year study, then why not a coordinated study of the best alternative for northern access for three agencies? It is disingenuous to show the northern National Forest access on the Preferred Alternative as administrative while also showing a potential public parking lot at the same location. Either the preferred alternative calls for administrative access or it calls for public access. Which is it? How can the public respond to something so ambiguous? Don't hide behind bureaucracy, agencies are of human making and we must be responsible for them.

Comment ID
2060

Mailing Information Comments

Comment Legistics Comments
PEPC # 187881

Author Type
Individual

Comment Type
web comment form

Name
Pauline I. Washburn
Organization Name

Street Address
335 8th St

Telephone#

Email

City
Del Norte

Mailing List

Local
L

State
CO

Zip
81132

Comment

I support the recommended Wilderness Designation of 51,00 acres, for the Great Sand Dunes National Park.

Comment ID**2061*****Name***

Gladys Richardson

Mailing List***Mailing Information Comments******Organization Name******Local***

L

Comment Legistics Comments***Street Address******City******State******Zip***

PEPC # 187882

9126 County Rd 103 South

Alamosa

CO

81101

Author Type***Comment Type******Telephone#******Email***

Individual

web comment form

dogmom335@earthlink.net

Comment

I support the NPS preferred alternative that would designate 51,000 additional acres of wilderness in the Park. As a local resident who values the park the way it is now, I hope that we can limit development as much as possible. I am always happy that I can bring visitors to the Dunes and show them something that they cannot see anywhere else.

Comment ID
2062

Mailing Information Comments

Comment Legistics Comments
PEPC # 187883

<i>Author Type</i>	<i>Comment Type</i>
Individual	web comment form

Comment
I support the 51,000 acres for wilderness.

Name
Michael S. Korba

Organization Name

Street Address
PO Box 16

Telephone#

Email

City
Crestone

Mailing List

<i>Local</i>	<i>State</i>	<i>Zip</i>
L	CO	81131

Comment ID**2063****Mailing Information Comments****Comment Legistics Comments**

PEPC # 187890

Author Type

Individual

Comment Type

web comment form

Name

John E. Reeves

Organization Name**Street Address**

1016 Sycamore Rd, PO Box 546

City

Crestone

Telephone#**Email**

syca@ctelco.net

Mailing List**Local**

L

State

CO

Zip

81131

Comment

I support the Wilderness designation for the NPS lands in the northern part of the Baca Grant. It is my belief and hope that the NPS, the USFWS, and the USFS will be able work together to provide an access to the northern Baca area through an entry, jointly funded, constructed, and staffed, located just south of the mi. 100 marker on CO 17. This could provide a well controlled entry over a track to the east 2.75, in., then south 2.25 mi., around Weismann Lakes and east 11 .35 mi. to Cow Camp and on to Liberty Rd. Maps show a minimal passage over wetlands. A two track passageway following the described route, with passing turnouts at each high point, would protect the sensitive areas and would provide a real wilderness experience for the public that would choose to access the park for recreation or the mountain front for hunting or climbing.

The entry building could have a small educational component to enhance the experience of the public and to impress on them the fragility of the flora and fauna they would be viewing as they use the area. Possibly the CO Dept. of Wildlife could be a participating entity in this endeavour.

I have read the Draft GMP received at the recent POA-Sonoran Institute meeting and wish to commend all the personnel that

contributed to this comprehensive document. I wish every citizen of the area could have the opportunity to read it and to comprehend, through such reading, the complexity of the problems to be solved in the interest of the public at large.

Thank you for your collective efforts. John E. Reeves, 1016 Sycamore Rd. in the Grants area of the Baca subdivision.

Comment ID**2064****Mailing Information Comments****Comment Legistics Comments****Author Type**

Organization

Comment Type

formal letter

Name

Michael Blenden

Organization Name

US Fish and Wildlife Service

Street Address

9383 El Rancho Lane

Telephone#

719-589-4021

Email**City**

Alamosa

Mailing List**Local**

L

State

CO

Zip

81101

Comment

I am writing with comments on the Draft General Management Plan/Wilderness Study/Environmental Impact Statement for Great Sand Dunes National Park and Preserve (Park). My primary concern with this plan is related to the issue of vehicular access to the Park and how that may influence the adjoining Baca National Wildlife Refuge.

The preferred alternative contains provisions that would allow public vehicular access to the Backcountry Access Zone in the northwestern corner of the Park. In the discussion on "Public Access to Federal Lands in the North – Ongoing Collaboration" the reader is left with the impression that future planning efforts by the U.S. Fish and Wildlife Service may result in access across refuge lands to the access zone on the Park.

Recently the Fish and Wildlife Service issued a final policy on appropriate uses of National Wildlife Refuges. A copy of this policy is enclosed. This policy provides guidelines to refuge managers in deciding whether a proposed use is appropriate on any refuge. The National Wildlife Refuge System Improvement Act of 1997 defines six wildlife-dependent public uses, including hunting, fishing, wildlife observation and photography, and environmental education and interpretation as appropriate uses of refuges when they are determined to be compatible with the purpose of the refuge. All other proposed refuge uses must be evaluated for their appropriateness. The procedures contained in this policy describe the initial decision process the refuge manager follows when first considering whether or not to allow a proposed use on a refuge by passing ten criteria.

In considering the public using a road across the Baca National Wildlife Refuge simply to access the Park's Backcountry Access Zone it does not satisfy the following three criteria:

- 1)The use is not manageable within available budget and staff. Construction and maintenance of new roads are out of the realm of feasibility at the refuge's current level of funding, as is the conversion of any existing roads to this use.
- 2)The use is not manageable in the future within existing resources.
- 3)The use does not contribute to the public's understanding and appreciation of the refuge's natural or cultural resources, nor does the use benefit the refuge's natural or cultural resources. The refuge is rich in natural and cultural resources. Without thoughtful interpretation, vehicular access across the refuge in order to reach the Park's Backcountry Access Zone will not contribute to public understanding and appreciation for those resources. Without a significant visitor management effort such access can easily jeopardize these resources.

I request that you modify the discussion in "Public Access to Federal Lands in the North – Ongoing Collaboration" to wording that more clearly illustrates to the reader that construction of new roads or conversion of existing Refuge roads closed to the public, for the purpose of allowing public access to the Park is an inappropriate activity for the foreseeable future. Please contact me if you would like to collaborate on text to communicate this situation to the public.

I appreciate the difficulty surrounding this access question and am committed to working with you until it is resolved.

Comment ID**2065****Name**

George & Frances Alderson

Mailing List**Mailing Information Comments****Organization Name****Local**

O of S

Comment Legistics Comments**Street Address**

112 Hilton Ave

City

Baltimore

State

MD

Zip

21228

Author Type

Individual

Comment Type

formal letter

Telephone#**Email****Comment**

Please include this letter as our comment on the draft General Management Plan and EIS for Great Sand Dunes, per your notice in the Federal Register of April 15, 2006. We had the pleasure of seeing the GSDNP last month during a vacation trip, and it is a truly magnificent area of wild lands. The expansion of the monument in 2000 to include the entire Great Sand Dunes natural system was a wise decision. Wilderness: We favor the NPS proposal of 51,000 acres of added wilderness designation, but we ask you to add the sand sheet lands in the northwest corner of the park and the sabhka lands surrounding the Medano Ranch. Wilderness designation should be used to give statutory protection to all wild lands in the park except those slated for structures or developments that are absolutely necessary for administrative and visitor use. "Two-tracks" and unneeded old roads should not be an impediment to wilderness status, as nature will heal those impacts (aided by NPS or volunteer efforts, if necessary).

Visitor Traffic: We ask you to hold roads and parking areas to a minimum within the park/preserve boundaries, and work for any new motorized access to be outside the park, using mainly roads that already exist. This will leave the NPS lands to serve their highest purpose, which is as a natural landscape for enjoyment of the visitors. Motorized traffic and mountain bikes are not appropriate in the backcountry, and should be prohibited. Mineral and Cultural Resources: We urge NPS to move quickly to acquire subsurface mineral rights where split-estate lands exist, so the park will no longer be in jeopardy of mineral development. We also urge that archeological surveys be conducted throughout the park/preserve and appropriate stabilization and preservation work be conducted soon. Thank you for considering our comments. Please keep us informed of further action on the project.

Comment ID**2066*****Name***

Ruth A Remple

Mailing List***Mailing Information Comments******Organization Name******Local***

NL, in-state

Comment Legistics Comments***Street Address***

2954 Spinnaker Place

City

Longmont

State

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Zip

80503

Author Type

Individual

Comment Type

formal letter

Telephone#

303-776-9973

Email

ruth@remple.us

Comment

One of the most treasured places on earth is a most fragile and complex dune system, contained within the Great Sand Dunes National Park and Preserve. I was very happy to hear of your draft management plan's plan to add nearly 51,000 acres of wilderness, which will protect the parks oldest archaeological sites and species that live there. Please also propose wilderness protection for the northwest corner of the parks sand sheet lands and for the lands surrounding Medano Ranch. Please minimize roads and parking lots within the park by direct motorized access on existing roads. Restricted access is needed for the park's sensitive ecological areas, as well as biological, cultural, and wilderness resources.

Comment ID**2067****Name**

Betsy Shade, MD

Mailing List**Mailing Information Comments****Organization Name****Local**

O of S

Comment Legistics Comments**Street Address**

1762 Belle Court

City

Millersville

State

MD

Zip

21108

Author Type

Individual

Comment Type

formal letter

Telephone#**Email****Comment**

These comments are submitted for consideration on the draft general management plan for Great Sand Dunes National Park and Preserve. My sister recently say your area on a vacation trip. Our six children love wild country, and we all hope the magnificent lands of the Great Sand Dunes will still be wild when they grow up and explore our beautiful land for themselves. We understand that wilderness designations in GSD already include 36,000 acres of the original national monument plus 40,000 acres formerly managed by the Forest Service. In the lands added to the park by Congress in 2000, we favor the 51,000 acres proposed by the Park Service plus the "sand sheet" area in the northwest corner of the park and the "sabhka" terrain around the Medano Ranch. You should not let a few two-tracks left by the passage of vehicles become an obstacle, as those will disappear with time. Wilderness designation is essential to guard against reactionary moves like the recently abandoned rewrite of the Park Management Polices. Administrative protection can easily be changed, but the protection given to wilderness areas by Act of Congress is more permanent. We also favor keeping new access roads and parking lots outside the park boundaries insofar as possible. The park's landscape should remain natural, so we as visitors can expect to find wild lands, not parking lots. Motorized vehicles and mountain bikes should be kept out of the backcountry zone, so it will be truly wild for visitors going there. Please proceed with acquisition of privately owned mineral rights, and schedule a complete archeological survey of the park as quickly as possible. Than you for considering our thoughts. We wish you well in this planning effort.

Comment ID**2068****Mailing Information Comments****Comment Legistics Comments****Author Type**

Organization

Comment Type

formal letter

Comment

The U.S. Fish and Wildlife Service (Service) received your letter and draft General Management Plan/Wilderness Study/Environmental Impact Statement (GMP/EIS) for the Great Sand Dunes National Park and Preserve in Alamosa and Saguache Counties, Colorado, on April 19, 2006. Your letter requested concurrence with your determination that the proposed plan may affect, but is not likely to adversely affect the Canada lynx (*Lynx canadensis*) and that other Federally-listed species that may occur in the management action area be dismissed from further analysis based on no anticipated impact to those Species. These following comments have been prepared under the authority of the Endangered Species Act of 1973, as amended (16 U.S.C 1531 et. seq.) and the Interagency Cooperation Regulations (50 CFR 402).

The Service believes that there is not sufficient information to adequately evaluate the nature of the effects on Federally-listed species and cannot provide a concurrence for your determination of effects at this time. We are submitting the following comments and questions regarding your letter and GMP/EIS:

- 1) General Comment - The rationale for "dismissing" species is not clear in either the letter or the GMP/EIS. Is the dismissal based on lack of habitat for these species, or is it based on the likelihood that impacts will not occur? The dismissal of the yellow-billed cuckoo, southwestern willow flycatcher, bald eagle, and Mexican spotted owl should be discussed further with the Service.
- 2) Table 4, Boreal Toad - Please note that the boreal toad is no longer a candidate for Federal listing.
- 3) Table 4, Gunnison Sage Grouse - Please note that the Gunnison Sage Grouse is no longer a candidate species for Federal listing.
- 4) Table 4, Yellow-Billed Cuckoo - We do not agree with the statement that there is "not suitable habitat in the park". We should discuss this further.
- 5) Table 4, Southwestern Willow Flycatcher - We do not agree with the statement that there is "not suitable habitat in the park". We should discuss this further.
- 6) Table 4, Bald Eagle - If bald eagles are using the San Luis Lakes State Park, which is relatively close to the park line, we should probably have a more thorough analysis of the potential for the bald eagle to use the park.
- 7) Table 4, Mexican Spotted Owl - We do not think that suitable fields surveys have been done to be able to say that there are no Mexican spotted owls in the park.
- 8) Page 1, Uncompahgre Fritillary Butterfly - Sovell 2005 is not in the reference section.
- 9) Page 3, Yellow-Billed Cuckoo - The text says that Rawinski (2004) reported a cuckoo in the park in 1984, but Rawinski is not in the references. If there was a report of the cuckoo in the park, why is this species dismissed from analysis?
- 10) Page 3, Yellow-Billed Cuckoo - The Service generally considers a patch size of greater than 10 acres of riparian habitat to be large enough for evaluation as habitat for the cuckoo. We agree that the park has narrow riparian corridors, but we should evaluate the patch sizes within the park more thoroughly.
- 11) Page 3, Southwestern Willow Flycatcher - The Service generally considers a patch size of 0.25 acres or greater that contains dense riparian vegetation that is more than 5 feet in height to be suitable habitat for the flycatcher. Small stringers of riparian vegetation can be suitable if they are connected to a larger block or if a number of small stringers are in close proximity to each other.
- 12) Page 4, Bald Eagle - Same comment as #7.
- 13) Page 4, Mexican Spotted Owl - As stated in Comment # 8 we do not think that suitable fields surveys have been done to be able to say that there are no Mexican spotted owls in the park. Areas that should be considered as spotted owl habitat include mixed conifer forests (ponderosa pine and Douglas-fir, and often white fir) on steep slopes (greater than 40%), and often in a canyon or rocky outcropping setting.
- 14) Page 4, Mexican Spotted Owl - Recreational activities, including hiking, can adversely affect spotted owls, specially if the activity is near an active nest site.
- 15) Page 4, Canada lynx - The elevation range for the lynx is typically 8,000 to 12,000 feet (not 9,000 to 14,500 feet) and the habitat is typically a closed-canopy forest (not open canopy).

The Service appreciates the opportunity to review the letter and GMP/EIS and looks forward to working further on this plan with your staff. If the Service can be of further assistance, please contact Leslie Ellwood of my staff at (303) 236-4747.

Wednesday, July 11, 2007

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