



## Record of Decision

# General Management Plan / Wilderness Study / Environmental Impact Statement

July 2007

Approved:

A handwritten signature in black ink that reads "Michael D. Snyder". The signature is written in a cursive, flowing style.

Michael D. Snyder  
Intermountain Regional Director  
National Park Service

A handwritten date in black ink that reads "7/19/07". The date is written in a simple, legible style.

Date

**United States Department of the Interior  
National Park Service**

**RECORD OF DECISION**

**General Management Plan / Wilderness Study / Environmental Impact Statement**

**Great Sand Dunes National Park and Preserve  
Colorado**

The Department of the Interior, National Park Service (NPS), has prepared this record of decision (ROD) on the environmental impact statement for the final General Management Plan / Wilderness Study / Environmental Impact Statement (GMP/WS/EIS), Great Sand Dunes National Park and Preserve. This ROD includes a description of the background of the project; a statement of the decision made including common actions, key actions, and mitigating measures/monitoring to minimize environmental harm; synopses of other alternatives considered; findings on impairment of park resources and values; the basis for the decision including a description of the environmentally preferred alternative; and an overview of public involvement and agency consultation in the decision- making process.

**BACKGROUND OF THE PROJECT**

Great Sand Dunes National Monument operated under a master plan that was approved in 1977. The National Park Service initiated development of a new general management plan (GMP) in mid- 1990; however, this effort was abandoned in 1999, when it appeared that Congress would expand the national monument. The Great Sand Dunes National Park and Preserve Act of 2000 expanded the national monument almost four- fold, authorized conversion of the national monument to a national park, and established the Great Sand Dunes National Preserve. The 1977 master plan is outdated and does not provide background information, a foundation for planning, or management guidance for the expanded national park and preserve. The wilderness study is included as part of the GMP because of legislation, public interest, and timeliness. The 35,955- acre Great Sand Dunes Wilderness Area (created by Congress in 1976) is located within the former national monument. Approximately 40,000 acres of wilderness is located within the national preserve (part of the Sangre de Cristo Wilderness Area established in 1993 and formerly administered by the U.S. Forest Service [USFS]). The wilderness potential of the greatly expanded national park had not been evaluated. The GMP also includes an evaluation of wild and scenic rivers. The final GMP/WS/EIS provides updated management guidance for the national park.

The GMP/WS/EIS provides a framework to help park managers guide programs and set priorities for resource stewardship, visitor understanding, partnerships, facilities, and operations. It was developed with public involvement and tribal and agency consultation. The GMP/WS/EIS describes and analyzes a recommended course of action and two alternatives for managing and using Great Sand Dunes National Park and Preserve. The selected alternative will guide management of the park for the next 15 to 20 years.

## DECISION (SELECTED ACTION)

### Description of the Selected Action (Alternative 2 in the GMP/WS/EIS)

Desired future conditions, or goals, are identified that describe the ideal conditions the National Park Service is striving to attain. They guide actions to be taken by park staff on such topics as natural and cultural resources management, wilderness management, and park facilities and visitor use management. Strategies describing actions that may be taken by park staff to achieve the desired conditions and strategies, combined with actions that are specific to the plan, form the complete GMP for the Great Sand Dunes.

Several actions were deemed *common to all action alternatives* in the draft plan, including the preferred alternative, and those actions are also part of the final plan. They include:

- cooperation with neighbors
- acquisition of subsurface rights
- a position that a NPS- managed bison herd would not likely occur during the life of this plan
- a Medano Ranch irrigation study
- no permitted use of ORVs
- a hunter access permit system
- elimination of unnecessary roads
- treatment of historic structures in the backcountry
- sanitation facilities
- a fee program
- use of Alpine Camp
- boundary adjustments

The National Park Service will continue to work with partners and park neighbors to develop management strategies for elk and bison.

Most of Great Sand Dunes National Park and Preserve will remain wild and undeveloped. Management zones have been established for park lands. Management zones define specific resource conditions, visitor opportunities, and management approaches to be achieved and maintained in each area of the park. Sensitive resources will be protected by actions such as the designation of a “guided learning zone” around Big and Little springs.

A formal wilderness study was conducted as part of this planning process. The wilderness study recommends the addition of about 53,000 acres within the national park expansion lands to the National Wilderness Preservation System.

No significant changes will occur in the main dunes area. However, future vehicle congestion will be addressed by construction of trails to reduce vehicle use, use of a temporary modest

shuttle bus at peak times, and other management techniques, rather than by expanding parking areas. The following clarification is hereby made *in italics* to the discussion of transportation on page 61 of the final GMP/WS/EIS:

To address existing and growing vehicle congestion in parking areas and along the access roadway to the Dunes parking area on summer weekends, the park would pursue managing traffic by first operating a temporary shuttle service such as the modest shuttle system operated on a trial basis in the summer of 2005. *This shuttle allows people in the visitor center and campground to leave vehicles at those locations.* If congestion and visitor and employee safety along the dunes access road becomes a persistent problem, transportation studies would be undertaken to determine the need, configuration, and feasibility of a more formal transportation system. *If it is determined that the costs of such a system are unavailable or prohibitive then the park might consider adding a small unpaved overflow parking area in the vicinity of the Dunes lot as an interim measure until funds become available for a formal transportation system.*

Medano Ranch, managed by The Nature Conservancy, may eventually come under NPS management. The National Park Service would seek partnerships to maintain structures and provide scheduled visitor activities and educational opportunities at Medano Ranch headquarters.

The NPS preferred alternative for access to the northern portion of the park is a road that would enter the park at the boundary of the Baca Grande subdivision, and terminate in a trailhead with a 10 to 15 vehicle parking area near the mountain front. The road and trailhead would be located north and outside of the Deadman Creek riparian corridor. In consultation with the National Park Service, the USFS will study the need for (and impacts of) providing public vehicle access to USFS lands via Liberty Road or via a route through the park that would connect with Liberty Road. These options are not evaluated in the GMP and would require a separate public and joint agency (NPS/USFS) environmental analysis study.

## **KEY ACTIONS IN THE GENERAL MANAGEMENT PLAN / WILDERNESS STUDY**

### **General Emphasis**

- Dunes area continues to be the main focus of visitor activity.
- New visitor opportunities in northwest backcountry and Medano Ranch.
- New horseback and trail options.
- Seek cooperative or joint facilities (e.g., access routes, trailheads, ranger stations).

## **Management Zones**

- Most of the park and preserve are zoned backcountry adventure zone or natural/wild zone.
- Frontcountry zone and dunes play zone—continue existing activities.
- Guided learning zone provides new visitor opportunities and protects sensitive resources.
- Backcountry access zone provides vehicular routes to backcountry destinations.
- Administrative zone for NPS operations and scheduled activities at Medano Ranch.

## **Wilderness**

- Most undeveloped areas of new park land (53,000 acres) recommended for wilderness.

## **Medano Ranch Headquarters**

- Maintain and adaptively use historic structures for NPS administrative purposes (remains open to the public on a limited basis for scheduled activities). Seek partnerships for maintaining structures and providing visitor activities and educational opportunities.

## **New Trails and Trailheads**

- Construct new trailhead in northern portion of the national park and new trails in backcountry adventure zone.
- Link park and preserve trails to outside trails where possible.
- Install new trails in guided learning zone.
- Maintain cooperative trailheads around park, if possible (e.g., Oasis, Baca National Wildlife Refuge, San Luis Lakes State Park).

## **Public Access to North Portion of Park**

- Small backcountry parking area (10–15 vehicles) and trailhead within backcountry access zone improves foot, horseback, and vehicle access to public lands in the northwest.
- No campground in this area.
- Vehicular access route to trailhead to be determined in the future.
- Public vehicle access options to new USFS lands will be considered in a separate, future environmental analysis process.

## **Main Dunes Area Carrying Capacity**

- Possible modest shuttle system to transport visitors from remote parking areas to the dunes during peak summer weekends.

## **Backcountry Carrying Capacity**

- New trails in backcountry adventure zone accommodate use only in areas that can tolerate use.
- Guided learning zone protects areas around Big Spring and Little Spring through escorted access
- Sensitive areas (Upper and Lower Sand Creek lakes, Deadman Creek, Big Spring and Little Spring) are monitored and adaptively managed.
- Backcountry areas that join other public lands are managed in collaboration with those agencies.

## **Dogs**

- Within the national park, leashed dogs are allowed only within the frontcountry, dunes play, and backcountry access zones, and the Liberty Road administrative zone.
- Within the national preserve, leashed dogs are generally allowed.
- Only within the national preserve, unleashed dogs are allowed for hunting.

## **Bison**

- An NPS- managed free- roaming bison herd is not likely to occur during the life of the GMP. If additional bison habitat becomes available at some time in the future, this option can be reconsidered by the National Park Service.

## **MITIGATING MEASURES/MONITORING**

### **General**

- New facilities such as trailheads and trails will be sited in disturbed areas.
- Construction zones will be identified with temporary fencing prior to any construction activity. All protection measures will be clearly stated in construction specifications, and workers instructed to avoid areas beyond the fencing.
- Outdoor lighting for new or rehabilitated facilities will be the minimum amount required to provide for personal safety. Lights will also be shielded and/or directed downward.

## Natural Resources

- New trails will be sited with potential wildlife impacts in mind. Specific measures include the following (Trails and Wildlife Task Force et al. 1998):
  - Considering not only the narrow width of the trail, but also the wider area it may influence.
  - Seeking out degraded areas that have the potential to be used or restored when aligning a trail.
  - Aligning trails along or near human- created ecological edges rather than bisecting undisturbed areas.
  - Keeping trails away from known sensitive species, populations, or communities.
  - Locating trails where they can be screened and separated by vegetation or topography from sensitive wildlife.
  - Providing trail experiences that are diverse and interesting enough that recreationists are less inclined to create their own trails.
- Measures to control dust and erosion during construction will be implemented and could include: water sprinkling dry soil; installing silt fences and sedimentation basins; stabilizing soil with specially designed fabrics, certified straw, or other material; covering haul trucks; employing speed limits on unpaved roads; and revegetating disturbed areas where practicable.
- Wetlands and riparian habitats will be delineated, clearly marked, and avoided during construction. Best management practices will be employed including:
  - work scheduled to avoid the wet season
  - barriers provided between stream channels and trails or paved areas
  - disturbed areas kept as small as possible
  - silt fences, temporary earthen berms and water bars, sediment traps, stone check dams, or other equivalent measures installed prior to construction
  - regular site inspections conducted during construction
  - chemicals, fuels, and other toxic materials stored, used, and disposed in an appropriate manner
- Undesirable species will be controlled in high- priority areas. To prevent the introduction of and to minimize the spread of nonnative vegetation and noxious weeds, the following will be implemented:
  - Minimize soil disturbance.
  - Pressure wash all construction equipment before entering the park.
  - Limit vehicle parking to road shoulders, parking areas, or previously disturbed land.

- Obtain fill, rock, or additional topsoil from the project area. If this is not possible, require weed- free material be obtained from NPS approved sources outside the park.
  - Monitor disturbed areas for two to three years after construction
  - Handling nonnative vegetation in accordance with NPS Director’s Order – 77: *Natural Resource Management Reference Manual*.
- Before surface irrigation of meadows is discontinued on Medano Ranch, a study will be conducted to better understand how this action might affect wetlands, groundwater supplies, federal water rights, the Closed Basin Project. etc.
- Standard noise abatement measures will be implemented during park operations and construction activities.

### Threatened and Endangered Species

- Canada lynx habitat in the preserve will follow the guidelines provided in the Lynx Conservation Assessment and Strategy.
- Activities in the vicinity of bald eagle habitat will follow the Colorado Division of Wildlife (CDOW) raptor guidelines for seasonal avoidance and buffer distances.
- Initiation of a National Environmental Policy Act of 1969 (NEPA) process and additional consultation with the U.S. Fish and Wildlife Service (USFWS) if oil and gas exploration on lands within the park subject to private mineral rights occurs.
- Prior to the implementation of any activity in or near riparian habitat, surveys will be conducted for the southwestern willow flycatcher, yellow- billed cuckoo, bald eagle nests, and bald eagle winter roosts. Additional section 7 consultation with the USFWS may be appropriate if the proposed activity may affect these species.
- Prior to the implementation of any activity in or near dense coniferous forests on steep slopes, surveys will be conducted for the Mexican spotted owl. Additional section 7 consultation with the USFWS may be appropriate if the proposed activity may affect these species.
- Additional consultation with the USFWS will be required if any of the following occurs:
  - Documentation of use by the southwestern willow flycatcher, yellow- billed cuckoo, or Mexican spotted owl of relevant habitats within the national park and preserve.
  - Initiation of activities anticipated to impact the bald eagle winter roost site in the western portion of the park.
  - Identification of additional bald eagle winter roost sites or of bald eagle nest sites within the park.
  - Establishment of den sites by Canada lynx within the park.



## Cultural Resources

- The identification and evaluation of cultural resources in the park are ongoing. As much of the park has not been surveyed for cultural resources, the planning process for facilities, visitor use areas, trails, and other land and resource management actions and practices will include consultation with NPS cultural resource professionals and likely will include surveys for cultural resources. Land and resource projects and practices will be planned to avoid effects to cultural resources to the extent possible, using this cultural resource information. In any case, the National Park Service will comply with section 106 of the National Historic Preservation Act of 1966 (NHPA) in the planning for these actions, including consultation with the Colorado state historic preservation office (SHPO) and other consulting parties, as outlined in 36 *Code of Federal Regulations* (CFR) 800.
- Prior to undertaking ground- disturbing activities, the National Park Service will coordinate with cultural resource professionals to determine if archeological survey is warranted and/or if such activities should be monitored by a professional archeologist for unanticipated discovery of archeological resources. Workers will be informed of penalties for illegally collecting artifacts or intentionally damaging archeological or historic property and of notification procedures in the event that previously unknown resources are uncovered during construction.
- If any archeological resources are discovered, work in the immediate vicinity of the discovery will be halted, the discovery will be secured, NPS cultural resource professionals will document and evaluate the resource, and the National Park Service will take appropriate actions to avoid or mitigate effects to the resource, in consultation with the Colorado SHPO and other consulting parties.
- In the event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) (25 *United States Code* [USC] 3001) will be followed.
- The National Park Service will consult with associated American Indian tribes to develop and implement the programs that respect the beliefs, traditions, and cultural values of the American Indian tribes that have ancestral ties to park lands. The park will maintain government- to- government relations with associated tribes to ensure a collaborative working relationship, and will consult regularly with them before taking actions that will affect natural and cultural resources that are of interest and concern to them. The park will accommodate access to, and ceremonial use of, American Indian sacred sites by American Indian religious practitioners in a manner that is consistent with park purposes and applicable law, regulation, and policy.
- All proposed documentation, recordation, and mitigation measures for archeological, historical, and ethnographic resources that are included in or eligible for listing in the National Register of Historic Places (NRHP) will be stipulated in a memorandum of agreement among the National Park Service, Colorado SHPO (and/or, as necessary, the Advisory Council on Historic Preservation [ACHP]) in accordance with 36 CFR 800.

All practical means to avoid or minimize environmental effects from the selected alternative were adopted.

## **OTHER ALTERNATIVES CONSIDERED**

### **No-Action Alternative**

This alternative was developed to provide a baseline for evaluating the changes and impacts of the three action alternatives. This baseline is characterized primarily by conditions in December 2004, roughly two months after ownership and management of the Baca Ranch was transferred to the U.S. government, and by continuation of current management practices into the future. Most visitor use would continue to be focused in or near the eastern portion of the dunefield. The developed area east of the dunes (main park road, visitor center, and campground) would remain essentially the same. Some visitors would continue to explore backcountry trails and roads, and cross-country horse and hiking use would continue. Some people would enter the north part of the park on foot from the Baca Grande subdivision, via the two county roads that end at the park boundary.

No new areas would be recommended for wilderness. New park lands that were not open to public use before December 2004 would be managed in a conservative manner. That is, there would be no new development, and visitor use would be managed so as to not establish new practices for camping, types and routes of access, etc.

New park areas would be inventoried for natural and cultural resources and managed according to NPS policies that emphasize natural processes (for example, nonnative species, interior pasture fences, and artificial water holes and sources would be removed). Existing trails and trailheads in the park and preserve would be maintained, but there would be no new trails or trailheads. The Nature Conservancy would continue to manage Medano Ranch, including Medano Ranch headquarters. There would be no public use of Medano Ranch. Bison grazing would continue within the park on lands leased or owned by The Nature Conservancy. Leashed dogs would generally be allowed within the park and preserve.

### **Dunefield Focus—Maximize Wilderness Alternative**

Most visitor use and visitor activities would be focused in or near the eastern edge of the dunefield. Most of the rest of the park and preserve would remain wild and undeveloped, allowing natural processes to continue with minimal human influence. Backcountry areas would be primitive and rugged, providing outstanding opportunities for solitude and adventure. A large portion of the park expansion lands would be recommended for future designation as wilderness.

Existing trails and trailheads would be maintained. Most visitors would continue to visit the main dunefield area (main park road, visitor center, dunes parking lot, and picnic area). Parking and related support facilities such as restrooms could be expanded in the frontcountry zone if dunes parking areas filled too often. A new multiuse trail for bicyclists and pedestrians

would extend from near the park's main entrance to the visitor center, dunes parking lot / picnic area, and Pinyon Flats campground. A gate for horse access would be provided on the north boundary of the national park, and pedestrian access from the Baca Grande subdivision would continue.

The National Park Service would seek acquisition of Medano Ranch and would manage it as a natural/wild area. Ranch structures would not be maintained (or would be removed after documentation). Leashed dogs would be restricted to parking areas, picnic areas, and car campgrounds within the national park—dogs would not be permitted in the national preserve.

### **Three Public Nodes Alternative**

Most visitors would gain access to the park and preserve via three areas of “nodes.” Visitor facilities and trails would be concentrated in or near the three nodes, and the rest of the park and preserve would remain largely undeveloped. This alternative would provide diverse options for visitors to experience different portions of the dunes system.

The first node, located at the existing developed area east of the dunes, would remain essentially the same. The second node would be located at the Medano Ranch headquarters. The National Park Service would seek acquisition of Medano Ranch and would manage the ranch headquarters as a public day-use area, most historic ranch structures would be maintained, and guided hiking and horseback tours to nearby high interest areas could be provided. The third node, located in the northern part of the park, would include a backcountry trailhead and a primitive campground if an appropriate public vehicle access route can be identified via the Baca National Wildlife Refuge of Baca Grande subdivision.

Dogs would not be permitted in areas where there is increased potential for or a history of conflicts with visitors or with wildlife; otherwise leashed dogs would be allowed. In this alternative, no new wilderness would be recommended. The USFS, in consultation with the National Park Service, may study the need for (and impacts of) providing public vehicle access to USFS lands via Liberty Road or via an extension of Cow Camp Road to the mountain front. These options would be studied in a separate NPS/USFS environmental analysis study.

### **FINDINGS ON IMPAIRMENT OF PARK RESOURCES AND VALUES**

National Park Service policy (*Management Policies* 2001) requires analysis of potential effects to determine whether or not alternatives or actions will impair park resources. The fundamental purpose of the national park system, established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. NPS managers must seek ways to avoid, or minimize to the greatest extent practicable, adversely impacting park resources and values. However, laws do give NPS management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the park purposes as long as the impact does not constitute impairment of the affected resources and values.

Although Congress has given NPS management discretion to allow certain impacts within parks, that discretion is limited by the statutory requirement that the National Park Service must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, will harm the integrity of park resources or values, including opportunities that will otherwise be present for the enjoyment of those resources or values. An impact to any park resource or value could constitute impairment. An impact will be more likely to constitute impairment to the extent that it has a major or severe adverse effect upon a resource or value whose conservation is:

- necessary to fulfill specific park purposes identified in the establishing legislation or proclamation of the park,
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park
- identified as a goal in the park's GMP or other relevant NPS planning documents

Impairment might result from NPS activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. The environmental impact analysis identified and analyzed the following impact topics:

- Archeology
- Historic Structures
- Cultural Landscapes
- Vegetation
- Ecologically Critical Areas
- Federal Threatened and Endangered Species
- Wildlife, Including Colorado State- Listed Species
- Soils and Geologic Resources
- Wetlands
- Water Resources
- Visitor Use and Experience
- Scenic Resources and Visual Quality
- Socioeconomics
- Health and Safety
- National Park Operations
- Operations of Other Entities and Management Agencies

The environmental impact analysis identified no impairment of park resources or values.

## **BASIS FOR DECISION**

### **Process**

The planning team and Great Sand Dunes Advisory Council (Advisory Council) conducted field trips, and gathered and studied information and park resources, visitor use and values, and planning issues. With this information, the team and the Advisory Council developed four preliminary concepts for alternatives (including a no- action alternative) for managing natural and cultural resources and visitor use. These concepts were presented to the public in a newsletter, and comments from the public and other agencies were gathered and reviewed.

Based on public input and further consideration, the planning team developed three draft alternatives, each with an accompanying option for new wilderness from these preliminary concepts. The team also dismissed certain ideas or actions from further consideration. These draft alternatives were then presented in a newsletter and at public meetings, and again comments were collected and reviewed. Possible consequences of the alternatives were discussed, neighboring agencies were consulted, and additional field trips were conducted. Based on all of this information, certain elements of the GMP alternatives were modified.

The next major step was to identify (develop) a preferred NPS alternative. The four revised alternatives: “no- action,” “dunefield focus—maximize wildness,” “three public nodes,” and “dispersed use—joint facilities,” were evaluated. The planning team used an evaluation process called “choosing by advantages.” This process evaluates different choices (in this case, the four management alternatives) by identifying and comparing the relative advantages of each according to a set of criteria. In this case, the criteria were based on park purpose, significance, and fundamental resources and values. The Advisory Council reviewed the criteria and Council comments were incorporated.

The criteria area listed below (not in priority order):

- Preserves natural diversity and natural processes (especially fundamental resources and values).
- Preserves human connections (cultural resources), especially fundamental resources and values.
- Provides for visitor opportunities (especially fundamental resources and values).
- Supports park education and research programs.
- Provides for efficient NPS operations and for employee and visitor safety.
- Considers interests of neighboring agencies, communities, and public comments.

The team identified the relative advantages of each alternative for each of the six criteria. Each advantage (not each criterion) was given a point value that reflected its importance. Then, by adding up the scores for each alternative, the team was able to determine how the four alternatives compared overall. Costs of implementing the alternatives were then compared to examine the relationships between advantages and costs.

## Results

The relative advantages of the alternatives for each criterion are summarized below.

***Preserves natural diversity and natural processes (especially fundamental resources and values).*** The dunefield focus—maximize wildness alternative scored highest for this criterion. This alternative had the greatest amount of new wilderness proposed and most of the natural/wild management zone. It therefore had the least habitat fragmentation, least wildlife disturbance, and permitted a return to a more natural hydrologic regime. The management zones and minimal access would probably lead to relatively light use of the Baca and Medano Ranch areas, which would decrease the possibility of invasion of nonnative plants into biologically special areas.

***Preserves human connections (cultural resources), especially fundamental resources and values.*** The dispersed use—joint facilities alternative scored highest for protection of cultural resources, archeological resources, historic structures, and cultural landscapes. Its wilderness recommendation, overlaid with the guided learning zone, would help protect sensitive areas by limiting vehicle access. People would not be permitted to drive to areas containing especially sensitive resources. This alternative would maintain and preserve the Medano Ranch headquarters historic structures and cultural landscape via administrative and related adaptive use. This would provide an additional level of protection to sensitive cultural resources in and near the Medano Ranch area. The large backcountry adventure zone would permit trail construction leading away from sensitive areas.

***Provides for visitor opportunities (especially fundamental resources and values).*** The dispersed use—joint facilities alternative scored highest for this factor. It would accommodate growth in visitation, and provide an appropriate range of visitor opportunities. (The quality of visitor experiences was judged more important than having a wide variety of experiences that may not relate to the park's fundamental resources and values). A modest shuttle system would provide options for transporting visitors to the dunes area during peak visitor use periods. The guided learning zone would encourage a different type of park experience and provides protective measures for especially sensitive resources. A northern access point would be important for addressing neighboring agency needs and providing options for access to the northern portion of the park.

***Supports the park's education and research programs.*** The three public nodes alternative scored highest for this criterion because it would permit environmental education and interpretive options at Medano Ranch headquarters and would not limit vehicle access (no new wilderness recommendation) for researchers and educators.

***Provides for efficient NPS operations and for employee and visitor safety.*** The no- action alternative scored highest for this criterion due to no increase in fire risk and no access limitations (via wilderness recommendation) for administrative purposes. Also, Medano Ranch would be maintained by The Nature Conservancy, which would mean park staff would remain free for other operational tasks. Limited visitor access to new lands would keep additional patrol, response, and maintenance needs (and staff) to a minimum. No new services to provide or facilities to maintain would help keep park operations small and streamlined.

*Considers interests of neighboring agencies, communities, and public comments.* The dispersed use—joint facilities alternative scored highest for this criterion. It would preserve historic structures and landscapes at Medano Ranch and recommend new wilderness (which may affect management by some other agencies, but also preserves wilderness values that are highly valued by the public). It would provide flexibility to consider various access options to USFS lands and the mountain front. It would also provide some measure of administrative access for park and agency staff, new recreational opportunities for visitors, and partnering opportunities that could enhance socioeconomic interests in the San Luis Valley.

After studying the advantages of the revised alternatives according to the six criteria in the foregoing discussion, the planning team developed the NPS preferred alternative. The dispersed use—joint facilities alternative provided the overall best value (greatest total advantage for the cost expended), so the team started with this alternative, then studied the choosing by advantages results to see where elements of other alternatives could be incorporated to add advantages without adding much additional cost. In this way, certain other elements were incorporated to build the NPS preferred alternative. Having taken this step, the planning team eliminated the dispersed use—joint facilities alternative from detailed analysis and discussion in the GMP/WS/EIS to keep the document manageable and understandable, and because many of its key elements had been incorporated into the NPS preferred alternative.

The reason for the modification to the GMP/WS/EIS on page 61 (discussed earlier and regarding a possible future shuttle service) is to clarify how congestion will be managed if funds do not become available for a transportation system.

## **Environmentally Preferred Alternative**

The environmentally preferred alternative is determined by applying the criteria suggested in NEPA, which is guided by the Council on Environmental Quality (CEQ). The CEQ provides direction that

*...the environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA section 101: (1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations; (2) assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings; (3) attain the widest range of beneficial uses of the environment without degradations, risk to health or safety, or other undesirable and unintended consequences; (4) preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity, and variety of individual choice; (5) achieve a balance between population and resource use, which will permit high standards of living and a wide sharing of life's amenities; and (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.*

The NPS preferred alternative has the most advantages compared to the other alternatives. It also meets the purpose and need for the GMP. By managing the park in a conservative manner, protecting certain sensitive resource areas via the guided learning zone, limiting new facilities, recommending wilderness, and protecting key historic resources and cultural landscapes, the NPS preferred alternative realizes criteria 1 through 5. The alternatives do not differ much with respect to criterion 6.

After review of the alternatives' environmental consequences, it was determined that the NPS preferred alternative is also the environmentally preferred alternative. This alternative best realizes the full range of national environmental policy goals as stated in section 101 of NEPA.

## **SUMMARY OF PUBLIC INVOLVEMENT**

To date, public involvement for the *Great Sand Dunes National Park and Preserve General Management Plan* has included:

- one preliminary community- based workshop (about 40 participants)
- 12 public meetings in five communities (total attendance about 222)
- four wilderness hearings in four communities (testimony by about 50 individuals)
- five newsletters (334 comments received)
- 60- day public review of the draft GMP (3,394 comments received)
- quarterly (or more frequently) Advisory Council public meetings since January 2003
- numerous informal and formal meetings in communities by the Advisory Council, park superintendent, and park staff

### **Preliminary Workshop**

A three- day workshop, "Community- Based Ecosystem Stewardship," was held in Alamosa, Colorado, on November 19–21, 2002. The National Park Service hosted the workshop with the goal of developing solid working relationships among people committed to effective management of public lands within Great Sand Dunes National Park and Preserve. Approximately 40 participants, primarily from the San Luis Valley and representing various formal and informal groups, attended. Participants also included representatives from neighboring federal and state land management agencies.

### **Scoping**

In January 2003, the public was notified of the Great Sand Dunes GMP effort via three methods: (1) a *Federal Register* notice of intent to prepare an environmental impact statement, (2) distribution of Great Sand Dunes GMP Newsletter 1, and (3) a press release announcing public scoping meetings for the GMP.

#### ***Newsletter 1, January 2003***



- provided an overview of the Great Sand Dunes system and the Great Sand Dunes National Park and Preserve Act of 2000
- introduced the Great Sand Dunes Advisory Council
- discussed the concepts of general management planning and wilderness review
- outlined GMP issues and a general schedule for development of the GMP
- invited the public to attend four public scoping meetings about the GMP

### **Scoping Public Meetings**

Seventeen people attended the Alamosa, Colorado, meeting held on February 13, 2003. Twenty-three people attended the Crestone, Colorado, meeting on February 14, 2003. Twelve people attended the Golden, Colorado, meeting held on February 20, 2003, and 13 people attended the Westcliffe, Colorado, meeting on February 21, 2003. Many questions were answered and about 33 comments were received at these meetings. Superintendent Steve Chaney held a supplemental informal question and answer session in Crestone in April 2003. About 80 people attended this meeting.

Great Sand Dunes National Park Advisory Council members also held formal and informal meetings with various groups and individuals to identify planning issues and concerns. Council members then shared this information with the planning team during Council meetings.

Seventy written scoping comments were received by mail, e-mail, or Internet between February 13, 2003 and May 31, 2003.

### **Planning Framework**

All GMP planning must be done within the framework of the purpose and significance of the park and applicable laws. The public was invited to contribute to the development of that planning framework.

#### ***Newsletter 2, November 2003***

- provided a synopsis of comments received from Newsletter 1 and the public scoping meetings
- reviewed the park purpose, significance, mission, and interpretive themes
- outlined special park mandates including the Advisory Council, water resources, wilderness, hunting, fishing, trapping, domestic livestock, and the Closed Basin Project
- discussed fundamental resources and values including the dunes system, natural diversity, human connections, and visitor opportunities
- updated the planning steps and status of the wilderness review

Seventeen written comments were received by mail, e- mail, or Internet between June 23, 2003 and January 3, 2004.

***Newsletter 3 April 2004***

- summarized comments received from the second public comment period
- revised and condensed fundamental resources and values statements
- summarized an interagency meeting related to Great Sand Dunes planning
- provided a wilderness review update
- provided a Great Sand Dunes National Park Advisory Council update
- provided a planning steps update

**Alternative Development**

After identifying issues and concerns and establishing a planning framework, the National Park Service identified desired future conditions (goals) consistent with addressing these concerns and issues, and developed management zoning strategies that would achieve the goals identified above. Finally, alternative ways of achieving those goals were developed with public input.

***Newsletter 4, July 2004***

- discussed parkwide desired conditions (goals)
- provided an overview of the draft management zones
- updated the status of the wilderness review
- provided an Advisory Council update
- discussed alternative management concepts

Twenty- four comments were received by mail, e- mail, or Internet between January 4, 2004 and August 19, 2004.

***Newsletter 5, January 2005***

- presented refined alternatives
- discussed actions considered but dismissed
- provided a planning steps update
- invited the public to attend four public meetings

**Alternative Development Public Meetings**

Ten people attended the Alamosa, Colorado, meeting held on January 31, 2005; about 40 people attended the Crestone, Colorado, meeting on February 1, 2005; four people attended

the Golden, Colorado, meeting held on February 8, 2005; and six people attended the Westcliffe, Colorado, meeting on February 2, 2005. Many questions were answered and about 50 comments recorded at these meetings.

About 140 additional written comments were received by mail, e- mail, or Internet between August 20, 2004 and February 24, 2005.

Using input from the public and considering the probable environmental consequences and costs of the alternatives, the planning team developed a preferred alternative. A draft general management plan and environmental impact statement was produced and distributed for public review.

Newsletters and draft documents were also available online.

Great Sand Dunes National Park Advisory Council meetings, which were held every few months and were open to the public, included additional opportunities for public comment. Great Sand Dunes Superintendent Steve Chaney also held several separate, informal question and answer sessions in Crestone as the need arose. These sessions were well attended.

### **Draft General Management Plan / Wilderness Study / Environmental Impact Statement**

The draft GMP/WS/EIS for Great Sand Dunes National Park and Preserve was on public review between May 1 and June 30, 2006. A total of 3,394 comments were received via written letters, e- mails, and Web responses. In addition, four public meetings with wilderness study hearings were held in Crestone, Alamosa, Westcliffe, and Denver, Colorado, in mid- May.

There were 3,394 written comments received during the comment period. Of those, 3,326 were letters with nearly identical content (form/campaign letters). Nearly 50% of the comments came from the San Luis Valley and about 66% were from individuals.

The following summarizes the primary GMP topics addressed in the comments (wilderness study comments are found at the end):

**Access.** This topic generated by far the most comments. There are subtopics of access to the northwest portion of the park, access to national forest lands (including Liberty Road), as well as access in general. Nearly all the agencies and organizations commented on access to the northwest portion of the park, as did most individuals. The focal point of the issue was using roads through Baca Grande subdivision or the Baca National Wildlife Refuge, and how far into the park motor vehicles would be allowed. The plan proposes to defer implementation of this decision until a cooperative planning effort specific to the issue can be conducted.

Most of the respondents from the Baca Grande subdivision opposed access through the subdivision, although some supported it. Most of the general public supported access through the subdivision; however, they also favored ending motorized access at a trailhead located away from sensitive resources (at or near the park boundary). The USFS, CDOW, and several individual supporters proposed using or preserving the possibility of using Liberty Road for

public motorized access to the Baca Mountain Tract for hunting and recreation. A similar number of Baca Grande residents, organizations, and individuals specifically opposed opening Liberty Road to public motorized access.

The USFWS cited their policies for new roads in a refuge, concluding that constructing a road into the park through the refuge is inappropriate for the foreseeable future. Friends of the San Luis Valley National Wildlife Refuge asked the National Park Service to drop all reference to that option in the preferred alternative. Finally, several individual respondents specifically stated that motorized access to the park backcountry would be inappropriate.

**Alternative Selection and Overall Plan.** The overwhelming majority of agency, organizational, and individual respondents gave overall support for the preferred alternative. Descriptive words such as strongly, enthusiastically, and heartily were common. The Environmental Protection Agency rated the preferred alternative as “LO,” which indicates a lack of objections (their highest rating). There were, however, some suggestions to change elements of the preferred alternative, primarily as it addressed wilderness and access. The USFS, CDOW, and several individuals (form letters) challenged the adequacy of the document for an insufficient range of alternatives, primarily related to access (Liberty Road), and elk management. The Colorado Historical Society questioned the adequacy of the identification and evaluation of historic properties, and disagreed with some of the findings of effect. The USFWS questioned the sufficiency of the information to adequately evaluate the nature of effects on some federally listed species.

**Wildlife Management/Hunting.** About a third of respondents, including the USFS, CDOW, and individuals via form letters, addressed this topic. Some thought the GMP should be more specific about elk management. Some expressed concern that management of the elk herd in the area would be hampered if motorized access and harassment techniques to accommodate harvesting through hunting were hindered by closed roads and no mechanized equipment, which they felt would be the case with the wilderness recommendation proposed in the preferred alternative. Some expressed concern about NPS permit requirements to carry firearms and game through the park. Some suggested that the park be opened for hunting, while others were concerned about the impact of hunting on the Baca Grande subdivision (from where it is allowed on adjacent USFS land). A few comments were received from organizations and individuals that supported natural methods of wildlife management, including reintroduction of natural predators.

**Facilities.** About half the organizations and individuals commented on facilities. Most wanted no new facilities in the park. They felt new facilities such as roads, parking areas, and campgrounds should be located outside or at the boundary of the park. Only a few individuals wanted to see minimal new development of primitive campgrounds and roads. Several horseback groups and riders asked for improved horse trailer parking near the visitor center.

**Bison.** This topic was primarily addressed by organizations rather than individuals. The Nature Conservancy and several supporting groups presented information and arguments against the proposal in the preferred alternative that the National Park Service would likely not manage a herd of bison if The Nature Conservancy stops managing its herd. The Jicarilla Apache Tribe supported retaining bison.

**Sensitive and Fragile Resources.** Most of the organizations and many individuals supported inclusion of all the naturally fragile and sensitive areas (such as Deadman Creek and riparian areas) within the wilderness areas recommendation for increased protection and for directing visitors away from these areas. Those organizations and letters also supported the expedited purchase of mineral rights on the former Baca and Medano Ranch property, archeological surveys of the entire park with subsequent protection of archeological sites, and removal of roads to qualify more land for wilderness designation. A few individuals supported protecting cultural resources through the use of the guided learning zone.

**Wilderness Study/Recommendation.** The wilderness study was conducted within the GMP, but to comply with special wilderness study requirements public involvement for the wilderness study has been somewhat separated. Distinct hearings were held during the public meetings, and written comments regarding wilderness were compiled separately. There was substantial support for the wilderness recommendation presented in the GMP. Most organizations, most unaffiliated individuals, Saguache County, and more than 3,000 form letters supported the recommendation. There was a significant amount of information provided related to the benefits of wilderness designation. Many organizations and 3,000- plus form letters supported additional lands (northwest and southwest corners of the park) in the wilderness recommendation. CDOW and some individuals expressed concern about wilderness designation interfering with elk management. The USFS thought there should be more information on existing roads, wilderness condition, and restoration needs. Backcountry Horsemen and some unaffiliated individuals were opposed to wilderness designation for various reasons.

## CONSULTATION

Consultation with agencies and tribes for the development of this GMP/WS/EIS was initiated in 2004. A series of interagency meetings (for federal and state agencies) on the GMP/WS/EIS were hosted by the National Park Service during the planning process. The first meeting was held in November 2004, to aid understanding of the different agencies' missions, roles, and concerns related to management of lands in and near the Great Sand Dunes. The second meeting was held in April 2004, and its purpose was to share the National Park Service and Advisory Council's preliminary ideas about management alternatives for the national park and preserve and to get feedback on these ideas. The third meeting was held in March 2005, and its purpose was to gather input from the agencies on more detailed alternatives for the park.

Two key federal agencies involved in the GMP planning process are the USFWS (San Luis Valley National Wildlife Refuge) and the USFS Rio Grande National Forest, land management agencies on the east and west side of the park and preserve. The USFWS sent a comment letter on the draft GMP. The USFWS stated that their policies probably would not allow an access road through the refuge to the northwest corner of the park. The access would have to be directly tied to a wildlife- dependent activity and the USFWS would have to justify the road for refuge purposes first. The National Park Service and USFWS held a follow- up meeting on July 28, 2006, to discuss and clarify USFWS comments. The USFWS sent a follow- up letter stating that public vehicle access across the refuge would not occur during the life of the GMP.

The USFS Rio Grande National Forest also sent a comment letter on the draft GMP. They expressed the desire for the GMP to leave the option open to analyze a vehicle access alternative to USFS lands and invited the National Park Service to be a cooperating agency in their planning effort for the Baca Mountain Tract. The USFS also expressed concerns for elk management and a simple permitting system for hunters and other USFS users.

The Environmental Protection Agency reviewed the draft GMP and gave the document a rating of "Lack of Objections," which indicates that the agency considers the document adequate overall.

### Consultation Under Section 7 of the Endangered Species Act

The National Park Service initiated Endangered Species Act, section 7 consultation with the USFWS (Colorado field office) in January 2005, to determine the presence of federally listed threatened, endangered, and candidate species in the park. The USFWS responded on February 15, 2005, with a list of species potentially occurring in Alamosa and Saguache counties. The National Park Service delivered the draft GMP/WS/EIS to the USFWS, along with a letter requesting concurrence, in April 2006. Comments by the USFWS on the draft GMP/WS/EIS prompted a meeting between the National Park Service and the USFWS on September 20, 2006, to discuss revised treatment of the yellow- billed cuckoo, southwestern willow flycatcher, bald eagle, and Mexican spotted owl in the final GMP/WS/EIS. A revised memo requesting concurrence with the determinations for federally threatened, endangered, and candidate species, along with relevant sections of the revised GMP/WS/EIS was delivered to the USFWS on December 14, 2006. Additional consultation took place regarding the NPS

preferred alternative, and the revised text serves as the biological assessment for this consultation. The USFWS issued a letter of concurrence on January 24, 2007.

### **Compliance with Section 106 of the National Historic Preservation Act**

The National Park Service initiated consultation with the Colorado SHPO in January 2005. The Colorado SHPO responded on January 13, 2005, indicating that it concurred with the intent to use the NEPA process and documentation to comply with section 106 of NEPA.

On September 19, 2006, the National Park Service met with staff of the Colorado SHPO and clarified its intent not to use the NEPA process and documentation to comply with section 106 of the NHPA for specific projects identified within the GMP, diverging from previous statements. The National Park Service will comply with section 106 in accordance with 36 CFR 800 as it proceeds with further projects and plans as identified in the actions identified below. Additional consultation took place regarding cultural resources in the GMP/WS/EIS. The Colorado SHPO issued a letter of concurrence on January 18, 2007.

#### **FUTURE ACTIONS REQUIRING COMPLIANCE WITH SECTION 106 OF THE NHPA**

<b>Action</b>	<b>Section 106 Compliance</b>
<ul style="list-style-type: none"> <li>▪ New bicycle lanes along the park entrance road</li> </ul>	The National Park Service will comply with section 106 in accordance with 36 CFR 800 for the proposed new bicycle lanes.
<ul style="list-style-type: none"> <li>▪ Entrance station replacement in a new location near the park entrance</li> </ul>	The National Park Service will comply with section 106 in accordance with 36 CFR 800 for the proposed entrance station replacement.
<ul style="list-style-type: none"> <li>▪ Adaptive use of Medano Ranch headquarters for an NPS administrative center, and for public uses on a limited, scheduled basis</li> </ul>	The National Park Service will comply with section 106 in accordance with 36 CFR 800 for the proposed adaptive reuse and other management of Medano Ranch. This would include consultation on rehabilitation, maintenance (including lack of maintenance), new construction, and other management of Medano Ranch including structures and landscape elements.
<ul style="list-style-type: none"> <li>▪ Management and maintenance (including lack of maintenance) of other buildings and structures including but not limited to the superintendent's residence, cabins in wilderness areas, stamp mill, etc.</li> </ul>	The National Park Service will comply with section 106 in accordance with 36 CFR 800 for the management including maintenance (including lack of maintenance) or removal of buildings and structures. This would include evaluation of NRHP eligibility.
<ul style="list-style-type: none"> <li>▪ New access road and trailhead in the backcountry access zone in the northern portion of the park</li> </ul>	The National Park Service will comply with section 106 in accordance with 36 CFR 800 for proposed new access road and trailhead in the northern backcountry access zone.
<ul style="list-style-type: none"> <li>▪ New trails in undetermined locations within the backcountry adventure and guided learning zones</li> </ul>	The National Park Service will comply with section 106 in accordance with 36 CFR 800 for all proposed new trails.

**FUTURE ACTIONS REQUIRING COMPLIANCE WITH SECTION 106 OF THE NHPA**

Action	Section 106 Compliance
<ul style="list-style-type: none"> <li>▪ New hiking/biking path connecting Pinyon Flats campground to dunes parking area and visitor center</li> </ul>	<p>The National Park Service will comply with section 106 in accordance with 36 CFR 800 for the proposed new hiking/biking path connecting Pinyon Flats campground to the dunes parking area and visitor center.</p>
<ul style="list-style-type: none"> <li>▪ Other projects and management plans (i.e., elk management plan, wilderness management plan, noxious weed management plan, commercial services management plan)</li> </ul>	<p>The National Park Service will comply with section 106 in accordance with 36 CFR 800 regarding other management plans and projects. The 1995 nationwide programmatic agreement among the National Park Service, National Conference of State Historic Preservation Officers, and the ACHP will be followed.</p>

**American Indian Consultation**

The National Park Service initiated consultation with affiliated tribes on January 5, 2004, when a letter was sent to each tribe notifying them of the GMP effort. The letter included as enclosures the GMP newsletters published to date. It also invited the tribes to participate in the planning effort. A year later, on January 11, 2005, a letter was sent to each tribe inviting representatives to participate in a March 2005 meeting of the Great Sand Dunes National Park Advisory Council; the Oglala Lakota and Jicarilla Apache tribes responded affirmatively and participated in the meeting. On February 8, 2005, the National Park Service sent another letter to the tribes regarding a land exchange effort that is not directly related to the GMP. This letter included a reminder that the National Park Service also seeks their input on the GMP. Park staff conducted follow-up meetings and telephone calls with representatives from several tribes throughout the planning process.

More than 20 American Indian tribes have been informed of the ongoing general management planning process, and were sent the draft GMP and invited to participate in further consultation. Two tribes, the Comanche Tribe and the Pueblo of Laguna, responded to the draft GMP/WS/EIS with letters, and two tribes requested consultation meetings.

**Southern Ute Tribe.** On June 5, 2006, members of the GMP planning team met with the NAGPRA coordinator of the Southern Ute Tribe in the cultural affairs office at tribal headquarters in Ignacio, Colorado. The draft plan was presented and discussed. The only comment was for the National Park Service to keep the plan as flexible as possible so it could react to future changing conditions.

**Jicarilla Apache Tribe.** On June 6, 2006, members of the GMP planning team met with several members of the Jicarilla Apache Tribe at tribal headquarters in Dulce, New Mexico. Attendees included the president and vice president of the Jicarilla Apache Culture Committee and the director of the Jicarilla Apache Culture Center. The team presented the plan and discussed details and issues. The only issue that generated any significant discussion was the NPS proposal to probably not continue a bison herd if The Nature Conservancy chooses to



discontinue bison management. The genetic condition of the existing herd and the confirmed presence of cow genes was discussed. The tribal representatives commented that the genetic purity was not the important factor. How the herd is fed (free range) is more important. It was pointed out that the National Bison Association is working to remove cow genes from bison. It was also pointed out that the State of Colorado designates bison as a wild animal. The tribe expressed an interest in the bison herd being managed as wild in its natural state, much the same as elk and deer. Also discussed was that the current land used to manage the herd (40,000 acres) was too small for a free- ranging herd and that it might be more feasible if more land becomes available for a free- roaming bison herd. With that in mind, the discussion ended with a desire on the part of the tribe to change the wording in the GMP, putting more emphasis on being flexible to possible changing future conditions than on “probably not continue.” They would send formal comments on the draft GMP, which would include new wording for the bison issue.

## **CONCLUSION**

As described in the “Mitigation” section, all practical means to avoid or minimize environmental effects from the selected alternative have been adopted. Because there would be no major adverse impacts to resources whose conservation is (1) necessary to fulfill specific purposes in the establishing legislation or proclamation for Great Sand Dunes National Park and Preserve; (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or (3) identified as a goal in relevant NPS planning documents, there would be no impairment of park resources or values. After a review of these effects, the alternative selected for implementation will not impair park resources or values and will not violate the NPS Organic Act.