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December 27, 2017

Dan Dallas
Rio Grande Forest Supervisor
Attn: Forest Plan Revision
1803 W. U.S. Highway 160
Monte Vista, CO 81144

Dear Mr. Dallas:

We appreciate the opportunity to provide comments on the draft EIS and proposed Rio Grande forest plan. Our comments are targeted at those portions of the Rio Grande National Forest near the shared boundary with the San Juan National Forest.

San Juan Citizens Alliance is a Durango-based 501(c)(3) community-based conservation organization. We have 1,000 dues paying members who live predominantly in southwest Colorado, and 4,000 additional supporters.

Beartown/Indian Ridge addition to Weminuche Wilderness

We are supportive of Alternative B's recommendation for addition of the Beartown and Indian Ridge roadless areas to the adjacent Weminuche Wilderness. We concur with the observation that this is a remarkably remote section of the Rio Grande National Forest and addition of the areas would complement and enhance the Wilderness. The Continental Divide National Scenic Trail traverses across this area, leaving the Wilderness as it descends off the Divide itself above Kite Lake, crossing the high alpine basin around Hunchback Mountain, and re-entering the Wilderness at Hunchback Pass.

The area retains significant naturalness and the imprints of human activity are substantially unnoticeable. Most of the area consists of the steeply forested slopes and high ridges of Indian Ridge and the divide between Bear Creek and Quartz Creek. These areas are trailless and completely lacking any signs of human activity. Some prospecting pits and other signs of historic mineral exploration dot the slopes around Kite Lake, but these are substantially unnoticeable in the larger context of the area. They are also no different than other similarly historic mining exploration impacts already within the Weminuche Wilderness, such as around Highland Mary Lakes, in Chicago Basin, and along Needle Creek.

This section of the Rio Grande National Forest is exceedingly remote. The four-wheel-drive road to Beartown requires either an extremely arduous journey up from Rio Grande Reservoir, or a roundabout excursion over Stony Pass, down to Pole Creek, and back up Bear Creek. Because of this remoteness, the area retains outstanding opportunities for solitude. At the height of the summer hiking and backpacking season, visitors are likely to only encounter a couple of other parties along the Divide, and certainly none out along the ridges or slopes specifically within the proposed wilderness additions.

The CDT provides outstanding opportunities for primitive and unconfined recreation, including hiking, backpacking, horsepacking, and hunting. The two-mile segment of the CDT around Kite Lake and Hunchback Mountain is the only portion of the 85-miles of the CDT between Stony Pass and Wolf Creek Pass that is not currently within the wilderness. The Beartown/Indian Ridge addition will thus create the longest continuous wilderness segment of the CDT in the Southern Rocky Mountains.

Upper Rio Grande Wild and Scenic River Evaluation

The DEIS carries forward the existing wild and scenic river eligibility determinations for rivers and streams on the Rio Grande NF, but does not appear to have made an evaluation of whether changed circumstances suggest revisiting any of its prior assessments. The most glaring omission from the identified eligible river segments is the uppermost reaches of the Rio Grande itself, the segment from its very headwaters at Stony Pass down to Rio Grande Reservoir. We believe changed conditions make it appropriate to re-evaluate Wild and Scenic River eligibility for the upper Rio Grande.

The upper Rio Grande is one of the iconic rivers of the West, and this segment is the centerpiece of one of the most remote and remarkable portions of the Rio Grande National Forest. The DEIS notes in several instances the remoteness of this reach of the river. The slopes and river valley of the Indian Ridge roadless area at the confluence of the Rio Grande and Pole Creek are described as “remarkably wild country” (DEIS at 500). The DEIS accurately describes this region as “the most remote location of the Forest, at the very headwaters of the Rio Grande.” (DEIS at 490).

Given the acknowledged remoteness of the upper Rio Grande, its agreed upon remarkable wildness, its extensive wetlands and beaver ponds, and the intriguing geologic history of the valley, we encourage the Rio Grande NF to review the wild and scenic eligibility of the upper Rio Grande. We believe that updated CNHP inventories from the early 2000s provide justification for changed conditions to encourage a fresh look at eligibility.

The upper Rio Grande possesses a range of outstandingly remarkable values. These include recreation, scenic, wetlands, biodiversity, and geologic values.

The upper Rio Grande consists of a sweeping, U-shaped glacial valley with vast beaver ponds and beaver lodges. Volcanic cliffs create a scenic backdrop. The river provides outstanding fishing opportunities that bolster its recreational appeal. As noted above, the sense of

remoteness combined with its scenic appeal creates outstandingly remarkable recreational values. The river valley draws visitors seeking opportunities for scenic driving on a challenging motorized route that parallels the river. Dispersed camping, hiking, hunting, and angling are all enhanced by the river's presence.

The river's ecological values are demonstrated by the fact that the Colorado Natural Heritage Program has identified two Potential Conservation Areas (PCAs) on this segment of the Rio Grande. This 15-mile segment of the Rio Grande has an extraordinary wetland ecosystem characterized by expansive beaver ponds in a textbook glacial valley in the most remote section of the national forest. A portion of the river also flows through the Weminuche Wilderness immediately below Stony Pass.

The Rio Grande at Pole Creek Mountain is a B3 high biodiversity site according to CNHP ranking. This PCA is recognized for its montane riparian willow carr community and extends along a 2-mile length of the Rio Grande. It is a wide, open glaciated valley with beaver ponds. CNHP notes, "Upper reaches of the site characterized by a willow carr are dominated by a consistent, dense tall shrub layer of Geyer's willow (*Salix geyeriana*) and park willow (*Salix monticola)* concentrated around large, open deep-water beaver ponds." In 2008, CNHP documented improvements to the site condition, "The site appears to be recovering from past grazing with more native species cover and less trampling and livestock use than the last survey in 1995."

The Pole Creek PCA, also a B3 high biodiversity site, includes another 2-miles of the Rio Grande. The mapped site is based on field inventories from 2002 and a 2008 survey of critical wetlands and riparian corridors in Hinsdale County. According to CNHP, the site is drawn for good (B-ranked) occurrences of two globally vulnerable (G3/S3) riparian plant communities, Booth's willow (*Salix boothii)*/mesic forbs shrubland and Wolf's willow (*Salix wolfii*)/mesic forbs shrubland.

The geologic values include the textbook glacially scoured valley, which creates the conditions for abundant beaver ponds and a robust wetland system. The river corridor includes the northern topographic wall of the Ute Creek caldera and excellent exposures of the Ute Ridge Tuff.

We believe the upper Rio Grande easily meets the requirements for eligibility as a scenic or recreational classification under the Wild and Scenic Rivers Act. We encourage the Rio Grande NF to conduct an updated evaluation of this river segment, and document the outstandingly remarkable values present.

<u>Wolf Creek Pass Landscape Linkage</u>

Wolf Creek Pass is the most important wildlife linkage zone in the San Juan Mountains. It is situated in the very heart of the San Juan Core Area for lynx, which comprises the core reintroduction area and the most expansive lynx habitat in the Southern Rockies. The Wolf Creek Pass linkage has been frequently utilized by lynx, and presumably may be important for other species such as pine marten, boreal owl, and wolverine in the future.

Wolf Creek Pass also includes the most complex management landscape on the Rio Grande National Forest. Much of the area has experienced severe mortality from spruce beetle, and the largest wildfires in the recent history of the San Juan Mountains have occurred in close proximity. The linkage area includes designated wilderness, Colorado Roadless Areas, and the Continental Divide National Scenic Trail, but it also incorporates a permitted ski area, a busy highway corridor, private inholdings, water impoundments, high recreation use both winter and summer, and past and present timber harvests. Moreover, the viability of the linkage area will be tested in the future by rapidly changing habitat conditions. The combination of spruce beetle epidemic, large intense wildfires, and climate change will impose new stresses in this area.

Given both the importance and the complexity of the Wolf Creek Pass landscape, we urge the Rio Grande NF to accord it elevated priority by designating a special interest area encompassing the pass. A good example of such an approach is the Rico special interest area that the San Juan NF designated in its 2013 land and resource management plan. The landscape around the town of Rico, like Wolf Creek Pass, presents many overlapping and complex management challenges around the wildland-urban interface, the town's water supply, winter and summer motorized and non-motorized recreation, legacy mining clean up, and future real estate development. The San Juan NF designated the Rico special area to "offer an opportunity for the SJNF to work collaboratively with the people of Rico in order to develop sustainable management practices for the planning area." (San Juan NF Plan at 236).

A special interest area designation for Wolf Creek Pass will focus the needed management attention on this crucial landscape for wildlife and landscape connectivity and emphasize the priority of juggling many competing human activities in order to preserve the viability of the linkage. The area was originally identified in the Southern Rockies Lynx Management Direction as a "lynx linkage area," which are "areas of movement opportunity" and "can be maintained or lost by management activities." The Southern Rockies Lynx Amendment offers guidance for the key lynx corridors on the Rio Grande, but Wolf Creek Pass' unique circumstances argue for more management emphasis than does North Pass or Spring Creek Pass or Poncha Pass where there are much fewer competing and overlapping management concerns.

The Forest Service has previously succinctly defined the critical significance to lynx of the Wolf Creek Pass linkage:

> Lynx are heavily using the Wolf Creek Pass Lynx Linkage area as a dispersal corridor and the viability of this linkage is important to the recovery of lynx in Colorado. The linkage spans a forested swath over the Continental Divide between large blocks of highly effective subalpine habitat. Lynx denning and established home ranges have been identified to the north and south of the Wolf Creek Pass Lynx Linkage. The linkage is part of the Colorado Division of Wildlife's "Core Research Area" in the San Juan Mountains, recognized as the largest continuous block of high quality lynx habitat in the state and where the CDOW focused their 10-year lynx monitoring and research efforts. (Village at Wolf Creek FEIS, 2014)

Managers concur that maintaining landscape-level habitat connectivity may be paramount to maintaining a viable population because of the patchy, discontinuous distribution of lynx habitat in the Southern Rockies Ecosystem. For that reason, landscape linkages must be available to allow lynx movements between adjacent mountain ranges. Linkage areas are areas of movement opportunities. They exist on the landscape and can be maintained or lost by management activities or developments. (Village at Wolf Creek FEIS 2014; Southern Rockies Lynx Amendment 2008)

The Wolf Creek Pass linkage area includes significant portions of two Colorado Roadless Areas, both managed as Upper Tier. A portion of the Trout Mountain-Elk Mountain roadless area is located immediately north of Highway 160, and the western half of the Fox Mountain roadless area is incorporated within the southern half of the linkage area.

The Continental Divide National Scenic Trail corridor defines the southern border of the linkage area. The trail corridor is managed to provide high-quality scenic, primitive hiking and equestrian opportunities. (Forest Service Manual 2350, 2009)

Two Potential Conservation Areas identified by the Colorado Natural Heritage Program are located largely within a proposed Wolf Creek Pass Landscape Linkage Special Interest Area boundary. The Haven of the Reflected Moonwort PCA is in the subalpine zone near the Continental Divide. It is ranked as High Biodiversity Significance for its occurrences of the moonwort family. The Pass Creek at South Fork Rio Grande PCA is ranked as a Moderate Biodiversity Significance site owing to an historic Rio Grande cutthroat trout population. (CNHP PCA Reports, 2015)

Wolf Creek Ski Area will be updating its master development plan at some point, the CDNST may have a specific management plan, the Village at Wolf Creek's future is uncertain and likely to undergo substantial revision if not outright termination, Colorado Department of Transportation will update its plans for the Highway 160 corridor at some point – all of these activities and priorities vying for attention suggest an overarching vision for Wolf Creek Pass outlined by a special interest area designation in the forest plan makes for smart proactive planning.

Chama Basin

We appreciate that the headwaters of the Rio Chama are identified as one of the Rio Grande NF's three priority watersheds, and will presumably receive more focused attention on watershed maintenance and restoration. Chama Basin is a key cog in the larger undeveloped landscape of the Southern Rockies, and maintaining both its wild character and its critical function as a primary water supply source for downstream New Mexico cities should be priorities.

While recognition as a priority watershed is worthwhile, we also endorse Alternative D's proposed Chama Basin Special Interest Area. Specific designation as a special interest area will elevate the basin's visibility and priority in future management.

Thank you for the opportunity to review and comment on the draft EIS and draft forest plan. We look forward to your consideration of our input.

Sincerely,

Mark Pearson

Mark Pearson
Executive Director