

**DRAFT GMP / WILDERNESS STUDY / EIS
PUBLIC COMMENT SUMMARY
August 14, 2006**

Great Sand Dunes National Park and Preserve



Prepared by e²M



EXECUTIVE SUMMARY

The draft General Management Plan / Wilderness Study / Environmental Impact Statement (GMP/WS/DEIS) 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). The following breakdown characterizes the written comments (without the form/campaign letters):

TYPES		ORIGIN		AFFILIATION	
E-mails	9	Local	31	Individuals	47
Mailed Letters	27	Non-local/In-state	20	Organizations	12
Web Responses	30	Out-of-state	14	Gov't Agencies	7
Comment Forms	2	Unknown	3	Tribes	2

The following summarizes the primary General Management Plan 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), and access in general. Nearly all the agencies and organizations commented on access to the northwest portion of the park and most individuals did, also. The focal point of the issue was using roads through Baca Grande subdivision or the Baca 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 Baca Grande opposed going through the subdivision, although some supported it. Most of the general public supported going 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 USFS Baca Mountain tract for hunting and recreation. About as many 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 constructing a road into the park through the refuge is an inappropriate activity for the foreseeable future. Friends of the San Luis Valley National Wildlife Refuges asked the National Park Service to drop all reference to that option in the final GMP. Finally, more than 50% of individual respondents specifically stated that motorized access in 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 (State Historic Preservation Officer) 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 hampered 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 their herd. The Jicarilla Apache supported retaining bison.

Sensitive and Fragile Resources. Most of the organizations and many individuals supported including all of the naturally fragile and sensitive areas, such as Deadman Creek and riparian areas within the wilderness areas recommendation for increased protection and directing visitors away from these areas. Those organizations and letters also supported the expedited purchase of mineral rights on the old Baca and Medano Ranch properties, archeological surveys of the entire park and 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. There was substantial support for the wilderness recommendation presented in the plan. 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) be recommended for wilderness. 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, as expressed in written comments and at the wilderness hearings.

DRAFT GMP / EIS / WILDERNESS STUDY

This document summarizes public and agency comments and tribal consultation on the Draft General Management Plan / Wilderness Study / Environmental Impact Statement (DGMP/WS/DEIS) that was distributed to the public for review in May and June 2006, and presented to the public at four public meetings in June 2006. The draft plan contained the no-action alternative, the preferred alternative, and two other action alternatives (dunefield focus-maximize wildness and three public nodes). Two wilderness options were analyzed in detail in the GMP: (1) recommend no new lands for wilderness, and (2) recommend most eligible lands for wilderness. The Wilderness Study proposed the latter option—nearly 51,000 acres were recommended for designation by Congress. In addition to comments submitted at the public meetings, 3,394 comments were received through letters, e-mail, and Web responses during the official comment period of May 1, 2006 to June 30, 2006.

PUBLIC MEETINGS

The four public meetings hosted by the National Park Service (NPS) were conducted in a modified open house format including a presentation on the draft plan, followed by an informal question/answer/comment period. Specific comment topics discussed at the meetings are summarized below. Comments and hearings testimony were received on the Wilderness Study and are summarized later in this document. At all of the meetings, one or more representatives from the Great Sand Dunes National Park Advisory Council, Colorado Department of Wildlife (CDOW), U.S. Fish and Wildlife Service (USFWS), and U.S. Forest Service (USFS) were in attendance to comment and help clarify information. The attendance and main topics discussed are summarized below:

Crestone (Attendance 29):

- the configuration of the wilderness boundary in the northwest part of the park
- access from the north into the park
- access to the national forest Baca Mountain tract
- elk management
- visitor use projections for the northwest portion of the park (primarily related to vehicle traffic in Baca Grande)
- oil, gas, and mineral rights and the implications for wilderness designation
- bison
- Medano Ranch disposition and use of facilities

Alamosa (Attendance 25):

- wilderness designation implications
- access from the north
- access to the national forest Baca Mountain tract
- elk management
- bison
- Medano Ranch disposition and use of facilities

Westcliffe (Attendance 10):

- horseback riding access and facilities
- access from the north
- access to the national forest Baca Mountain tract
- bison
- Medano Ranch disposition and use of facilities

Denver (Attendance 23):

- land ownership
- tours in the guided learning zone
- Medano Ranch buildings and access
- horse use and access at Medano Ranch
- water sources (wells) in the guided learning zone
- bison
- wilderness boundaries and management

WRITTEN COMMENTS

A total of 3,394 responses received on the GMP/DEIS/WS during the comment period. Specifically, there were:

- Unique – 68
 - e-mails – 9
 - mailed letters – 27
 - Web responses – 30
 - comment forms – 2
- Nearly identical/form/campaign letters – 3,326

The 67 unique responses were classified geographically as local (within San Luis Valley), nonlocal in-state, or out-of-state, based on their return address. The number of responses for each is as follows:

- local – 31
- nonlocal, in-state – 20
- out-of-state – 14
- unknown – 3

Responses were also classified as individuals, organizations, or government agencies/tribes. The number received for each type is as follows (see below for specifics):

- individuals – 3,374 (3,326 form letters)
- organizations – 12

- government agencies – 7
- tribes – 2

TRIBAL CONSULTATION AND CORRESPONDENCE

Tribal consultation

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

Southern Ute Tribe. On June 5, 2006, members of the GMP planning team met with the NAGPRA coordinator 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 when The Nature Conservancy discontinues the practice. We discussed the genetic purity of the existing herd and the confirmed presence of cow genes. They commented that the genetic purity was not the important factor. How the herd is fed (free range) was more important. It was pointed out that the National Bison Association is working to get cow genes out of bison. It was also pointed out that the State of Colorado designates bison as a wild animal. They expressed an interest in the bison herd being managed as wild in their natural state, much the same as elk and deer. We discussed 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 the USFWS at some point decided to include a free-ranging bison herd as part of their management design. 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.

Written Comments from American Indian Tribes

Comanche Tribe. *“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.”*

Pueblo of Laguna. *“At this time Laguna Pueblo has determined that the proposed undertaking WILL NOT have an effect, but in the event that any new archeological sites are discovered and any items are recovered, we would like to be notified to review items.”*

WRITTEN COMMENTS FROM AGENCIES, ORGANIZATIONS, OR ELECTED OFFICIALS

This section summarizes written comments from governmental agencies, organizations, and multiple form type letters. It captures selected quotes (“*in italics*”) and other key points (not italic) found in the more extensive text of the correspondence.

Governmental Agencies

Federal Agencies

U.S. Environmental Protection Agency

- Concur with discontinuing surface irrigation for bison forage if Medano Ranch is transferred to National Park Service, as it would enhance the restoration of Sand Creek, Big Spring, and Little Spring.
- Support guided learning zone to protect fragile areas.
- Support the goal of identifying and managing nonnative plant species, and possible elimination of some nonnative plant stands.
- “...we concur with the park’s intention to proceed with the dunefield focus wilderness recommendation while the Park Service and CDOW study means other than public hunting to control the elk herd size.”
- Want results of further consultation, if any, with the Hopi Tribe regarding the “lakes” and any possible impacts to these areas of importance.

“The Park Service’s Preferred Alternative is rated by EPA as “LO” under EPA’s rating criteria. 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 CDOW and the Forest Service, and summarize the results of tribal consultation, especially with the Hopi Tribe.”

U.S. Fish and Wildlife Service (Ecological Services, Denver, Section 7 Consultation)

“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:”

- The dismissal of the yellow-billed cuckoo, southwestern willow flycatcher, bald eagle, and Mexican spotted owl should be further discussed with the USFWS (more information was provided regarding these species).
- Please note that the boreal toad and the Gunnison Sage Grouse are no longer candidates for federal listing.

“The Service appreciates the opportunity to review the letter and the GMP/EIS and looks forward to working further on this plan with your staff.”

U.S. Fish and Wildlife Service (San Luis Valley National Wildlife Refuge Complex)

“Recently the Fish and Wildlife Service issued a final policy on appropriate uses of National Wildlife Refuges.” (citations of law policy included)

“In considering the public using a road across the Baca National Wildlife Refuge simply to access the Park’s boundary 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 of 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 the 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.”

U.S. Forest Service (Rio Grande National Forest)

“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 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 issues have been adequately addressed in the GMP. These concerns are still valid and they need to be fully addressed in the FEIS and GMP.”

“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.”

“...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 DIES should also clearly describe the current existing access on the Liberty Road.”

“There should also be more discussion on why the existing roads would be compatible with wilderness condition and how the NPS would obtain the privately owned land and mineral rights within the proposed

wilderness. Without a commitment in the GMP ... it seems that the proposed wilderness designation is unrealistic.”

“The DEIS/GMP suffers a NEPA weakness in that the analysis is constrained by a range of alternatives which are too narrow.”

Additional or expanded alternatives are recommended:

- Provide restoration activities in the GMP to allow wilderness designations to be meaningful.
- Provide unrestricted public motorized access to the national forest across the park on the existing Liberty Road. Include management options for the public to enter the park from a parking area located on the national forest lands.

Concerns about the impacts of existing elk herds on habitat and other wildlife. 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 in the future.

The access decision described in the GMP misleads the public. Provide a clear definition of the roles of the public and different agencies in the EIS/GMP process.

The EIS should clearly describe both NPS and USFS obligations under the Alaska National Interest Lands Conservation Act to provide access to private inholdings across federal lands.

Concerned that the current north Liberty Road entrance to NPS and USFS lands, designed to exclude horses, is preventing people with disabilities from entering the national forest.

Label the Rio Grande National Forest addition as the “Baca Mountain Tract.”

Would like to see noxious weed management specifically addressed in the GMP.

State Agencies

Colorado Division of Wildlife (CDOW)

Comment Letter 1 (CDOW)

“My staff has reviewed the alternatives to the general management plan. Two primary concerns stand out: 1) The designation of areas as wilderness or backcountry adventure areas and; 2) Nodes for Public access.”

Letter provides background on the elk population, concerns about herd size and habitat condition, and the potential for damage to agriculture. Because there is no hunting allowed within the park, there is concern about limited opportunity for harvest.

“Issues

1). Designating large areas as wilderness or "backcountry adventure", where vehicle access is severely limited or non-existent, will make it cumulatively more difficult to move elk out of the Park and into areas where access for hunters can affect some level of harvest .

2) Proposed access nodes limit public hunter access to the GRSA and public USFS lands. Adequate

female (cow) elk harvest is critical to the management of elk population numbers within DAU E -11. With limited access and retrieval opportunities, hunters are less likely to harvest a female animal due to the distance they will have to travel to pursue elk and to move them back to their vehicle.

3) As proposed, access allowed to hunters along the Liberty Road would require a hunter to secure a permit to transport firearms and game prior to entering NPS lands. It is anticipated that access will primarily occur during hours when the NPS personnel are not available to issue such permits.”

Alternatives suggested:

- Allow public (vehicle) access along Liberty Road.
- Public access for hunting recreation and game retrieval would not require an NPS permit for firearms possession.

Comment Letter 2 (CDOW)

“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 ... 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.”

The comments from the above-referenced CDOW letter are summarized by the “Comment Letter 1 (CDOW)” above.

“In addition to our prior letter, there are a few items in the GMP that I want 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 population; we need to clarify these statements.”
Specific information is provided to make this clarification.

A statement in the GMP regarding use in the guided learning zone located within the San Luis Lakes / Sand Creek ecologically critical area is quoted, and the following comment is made. *“Any and all accesses and special uses not related to hunting and fishing on the San Luis Lakes State Wildlife Area are subject to review and approval by the Division of Wildlife.”*

Colorado Historical Society (State Historic Preservation Officer)

“...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,” “Please note that addressing the identification and evaluation of historic properties within the park 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 park are planned.”

- Look forward to consulting with NPS on measures that might avoid, minimize, or mitigate any adverse effects of the undertakings on historic properties.
- Disagree with findings that proposed bike lanes and fee booth would not have an adverse affect on a historic property. There should be consultation or a programmatic agreement.
- Request consultation on other actions regarding the identification of historic properties and evaluation of effect.

Local Government

Saguache County Government

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

Organizations

Baca Grande Property Owners Association (POA)

“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 contiguous with the subdivisions 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 NPS 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 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 the other interested parties in 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 the community we value.

The POA heartily supports the designation as Wilderness of 51,000 acres of park land.”

Backcountry Horsemen [Note: there are several chapters that responded]

“I am definitely against the ‘Wilderness’ designation. That word alone makes an area susceptible to crowding once the information gets out. Look at some of the areas outside of Silverton. They not only have destroyed the peace and quiet, the wildlife is habituated to the extent they come right into camp.”

“The game needs to be managed through hunting and what will in turn keep out disease.”

Front Range Backcountry Horsemen

“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.”

Trailwise Backcountry Horsemen

“Historically horses have been used in this area that is now the Great Sand Dunes National Park. We do not want to lose this privilege. The parking for horse trailers is a problem.”

- Propose to improve the access and parking for horse trailers in the main dunes area (at the “point of no return” area, the Mosca Pass trailhead, and/or the amphitheater area).

Center for Native Ecosystems (CNE)

“CNE commends the NPS for its faithfulness to the purpose and values outlined in the Great Sand Dunes National Park and Preserve Act of 2000. CNE also specifically recognized the NPS decision to propose almost 51,000 acres of land for wilderness protection... Overall, we strongly support the NPS’s preferred alternative.”

Wilderness. *“...the NPS proposed management plan would protect portions of...Deadman Creek and San Luis Lakes PCAs (potential conservation areas). However, the proposed wilderness designation does not include the full extent of the PCAs. We encourage the PS to consider extending the wilderness boundary to include more or all of these PCAs. 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. 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 more of the rare and important sabkha ecosystem, encompassed by the San Luis Lakes PCA. In general, we encourage the NPS to consider the expert commentary provided by the Wilderness Society when evaluating decisions about the boundaries of the proposed wilderness areas within the Park. We support and incorporate by reference here all the commentary received from the Wilderness Society.”*

Bison. *“...regarding bison...we believe the NPS should consider managing for a free-roaming wild bison herd. We defer to the scientific support cited in these comments and encourage the NPS to work closely with The Nature Conservancy to explore the possibility to managing for a wild bison herd in the Park.”*

Colorado Mountain Club

Wilderness and Wild and Scenic Rivers. *“We commend the 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 intended 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.”

“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."

Support the wild and scenic rivers evaluation, but recommend that the NPS assess the values in Pole Creek and include the analysis in the final plan and decision.

Bison. *"...we were pleased that the plan leaves open the possibility of future bison reintroduction if adjacent landowners demonstrate interest in a cooperative introduction"*

Access on the north 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."*

- If via Cow Camp Road, recommend that the end (parking lot and trail head be located further west to protect sensitive riparian values in Deadman Creek.
- If via Camino Real or Liberty Road, recommend parking lot and trailhead be located outside Deadman Creek area.
- Support limiting the trailhead to a maximum of 15 parking places (including horse trailers) and a trailhead.

Medano Pass Road

- Support proposal to disallow off-road vehicles.
- Concerned about possible impacts of dispersed camping along road corridor.

Four-wheel drive tours. Plan should more clearly state conditions for tours, and state why tours meet "necessary and appropriate" standards.

Shuttle system. *"We recommend that the GRSA seriously consider implementing a car shuttle in the developed area on crowded summer days."*

Carrying capacity. *"...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."*

Potential Conservation sites. *"Given the ecological importance of the PCA (Potential Conservation Sites) areas, we urge the GRSA to include management goals, strategies, standards, and guidelines for these areas."*

User fees. The plan should provide more information about user fees, such as NPS intentions for fees in addition to entrance fees (if any), how fees would be used, and should specify fee waivers for volunteers and low-income visitors.

Dog boarding. *"We support the GRSA pursuing the creation of a dog kennel service in or near the park."*

Water availability in backcountry for hikers. *"We recommend that the GRSA check to make sure that the springs that supply water to backcountry travelers are not entirely within the guided learning zone and are available for restock by pedestrian travelers."*

Split estate. *“We recommend that the final plan provide direction to the GRSA to acquire from willing sellers all mineral estates within the park, if NPS geologists are of the opinion that fluid mineral development is not at all a likelihood.”*

Crestone Baca Land Trust

“The Board of Directors 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.”

“We have been particularly concerned about maintaining viable wildlife corridors connecting the valley floor to the high meadows. One of our goals has been to prevent the creation of additional barriers to the movements of animals along these east- west corridors by discouraging inappropriate development. Heavy vehicular traffic on a north- south road across east- west corridors such as Cottonwood Creek could produce significant ecological damage.”

“With a grant from the CDOW we have completed a biological survey of the Baca. 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.”

“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”.

“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.”

Friends of the San Luis Valley National Wildlife Refuges

“We agree with the majority of the preferred alternative described in the draft management plan. Our concern is the proposed access to the northern section of the park. The proposed alternative states the “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. 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. 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.”

Foundation for North American Wild Sheep

“The foundation for North American Wild Sheep (FNAWS) is in support to the National Park Service preferred alternative plan.”

“However, as more of the park is proposed 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.”

The Nature Conservancy

“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.”

“We strongly support wilderness designation for the vast majority of the new lands that have been added to the park.”

“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 are needed to meet the Park’s long-term management goals.”*
3. *“Bison restoration would provide the Park Service with a unique and invaluable opportunity to play a significant national role in the restoration of bison.”*
4. *”Bison restoration would conform to NPS reintroduction policy.”*
5. *“There are alternate views of the NPS’s justification for eliminating the possibility of bison restoration.”*

A large amount of data was presented to support the reasons stated above for the National Park Service to reconsider the elimination of the restoration of bison.

The Wilderness Society

This letter was cosigned by and submitted on behalf of the following groups:

- San Luis Valley Ecosystem Council
- Sinapu
- Colorado Environmental Coalition
- Rocky Mountain Recreation Initiative
- Upper Arkansas and South Platte Project
- Southern Rockies Ecosystem Project
- San Juan Citizens Alliance.

“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 expedited approach to land acquisition.”

A. Wilderness

1. Wilderness is important for protection of deserving park lands.
 - a. Extending wilderness protection to the sand sheet would secure the preservation of the entire dunes system.
 - b. Wilderness would protect wildlife habitat.
 - c. Wilderness would preserve fundamental visitor opportunities.
 - d. Wilderness would help protect cultural resources.
2. Expansion of the wilderness recommendation.
 - a. Extend the wilderness recommendation to the northern boundary in the northwest corner of the park. Include lands in the vicinity of Cow Camp Road – we believe these lands to be eligible for wilderness. Any lands not deemed necessary for a trail head and parking area (when the location is finalized) should be included in the wilderness proposal. Lands near the Deadman Creek riparian area should be protected from motorized travel.
 - b. Extend wilderness to the southern and western boundary in the southwest corner of the park. Extend the wilderness recommendation to include all of the land zoned “Natural/Wild” in the vicinity of the Medano Ranch. We do not agree with the NPS reasons for excluding this area from the recommendation. Inclusion of these lands would provide permanent protection for extended sections of Big Spring and Little Spring creeks, the San Luis Lakes/Sand Creek potential conservation site, the sabkha and its unique wetlands and wildlife. The wilderness boundary should approach the Medano Ranch road to within a 75- to 100 foot buffer. Exclude non-wilderness compatible Closed Basin features without disqualifying surrounding lands. The administrative area immediately around the Medano Ranch can be excluded without disqualifying surrounding lands. Corrals, stock tanks, and other impermanent ranch structures should not preclude lands from wilderness eligibility.
3. Wildlife management concerns: elk management

“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 such management whenever possible.”

- Concerns about limited flexibility for elk management are understandable, but easily addressed. The minimum tool requirement, under the Wilderness Act, directs managers to analyze which management actions have the least impact. The rule can be flexible and could allow motorized use in specific situations.
- If studies of elk and bison determine a need to reduce the elk herd, the NPS should consider a wide range of tools, including natural predation. Study the feasibility and viability of reintroducing either Mexican or gray wolves to the area.
- We encourage the National Park Service to collaborate with other government agencies to determine the best solution for elk management.

B. Backcountry access: northwest corner of park lands

1. Public motorized access should be primarily provided on established roads outside the park. We agree with all access decisions in the NPS preferred alternative with the exception of the

backcountry access designation to the entirety to Cow Camp Road and the administrative access designation for four-wheel drive roads in lands with wilderness qualities deemed natural/wild near Medano Ranch.

- Encourage the National Park Service to collaborate with other agencies (USFS and USFWS) as well as other relevant entities (Baca Grande subdivision) to find solutions for providing motorized access to the park on established roads such as Camino Real and the section of Liberty Road north of the park boundary.
 - Parking areas, if necessary, should be located outside the park boundary.
 - Support NPS proposal to limit facilities in north section of park to 15 parking places and a trailhead.
 - Encourage the National Park Service to address access issues in greater detail in the GMP. National Park Service should identify the public access options that would most benefit the park and its resources.
2. Use at the end of Cow Camp Road.
 - Motorized use at the end of Cow Camp Road – it comes too close to sensitive ecological areas such as Deadman Creek.
 - Cow Camp Road should not be extended eastward to Liberty Road, for the same reasons.
 3. Keep Liberty Road closed to public vehicles and to all motorized use beyond the first 0.25 mile within the park boundary.
 4. Keep parking area out of sensitive lands in the northwest corner of park.

C. Limit administratively-zoned routes at Medano Ranch.

- Support NPS proposal to allow only administrative vehicle access in the southwest portion of the park (limiting public access) and therefore limiting the potential for vandalism at nearby archeological sites and damage to ecologically sensitive areas.
- Urge the National Park Service to limit the number of administratively zoned routes around Medano Ranch.
- Urge the National Park Service to reduce use of two-track routes used by staff primarily for the purpose of monitoring wells. Consider the possibility of monitoring these wells by foot or horseback. If there are routes that must remain open to motorized use, 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 adequately reflects the sensitivity of the natural resources in the park. We are requesting zoning changes for several backcountry routes.

1. Rehabilitate unnecessary routes and protect wilderness-quality lands. Reduce administrative routes around Medano Ranch and include them in backcountry/wild zone. Reduce backcountry adventure zone in the northwest corner of the park when the specific locations of access roads and parking have been determined.
2. Guided learning zone provides much needed protection.

E. Bison.

- In general, we support the reintroduction of native species to their native habitat.

- We defer to the scientific support for the reintroduction of bison to the park, as cited in comments from The Nature Conservancy.

F. Motorized/Mechanized Vehicles.

- We agree with the NPS decision to prohibit OHV use in the park and monitor for illegal use.
- We understand that “driving in sand on the Medano Pass Primitive Road” is considered a “fundamental visitor opportunity.” Make sure the location and volume of traffic to not degrade the natural values of Medano Creek or compromise visitor’s experiences of quiet in the park.

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.”

Upper Arkansas and South Platte Project

Wilderness. “I fully support this Wilderness designation. I strongly urge the addition of sand sheet lands in the northwest corner of the park to your wilderness proposal. Please recommend wilderness protection for lands not slated for access and parking lots if such structures are necessary [in the northwest corner]. Wilderness-quality lands surrounding Medano Ranch...should also be added to the plan’s proposed Wilderness areas. The sabkha...is underrepresented in the wilderness proposal...”

Facilities. “One of the most 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. Commercial enterprises outside the park are available and can grow to accommodate increased request. In addition, the concentration of visitor services in current locations is desirable, and the backcountry should be reserved for foot and horse travel. Roads and parking lots within the park should be kept at an absolute minimum.”

Access. “Any new motorized access should be located outside the park on existing roads through cooperative agreements with other governmental agencies and relevant entities. 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.”

“...archeological surveys on all park lands should be conducted as soon as possible. It is important to expedite the purchase of subsurface mineral rights...”

COMMENTS OF NEARLY IDENTICAL CONTENT (FORM/CAMPAIGN LETTERS)

Letter Group 1

Letters, e-mails, and Web responses were received from 3,309 individuals that focused on the wilderness designation. Most were identical, but some were personally phrased. Most included the following common core:

“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 sabkha, 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.”

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

Letter Group 2:

Thirteen letters and Web responses were received that were opposed to access to the park across the northern boundary. All these letters were nearly identical. A summary of a comment letter follows.

Northwest Access:

“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.)”

- Concern about fire hazard and nonnative plant introduction.
- Concern about noise, traffic litter, and crime impacts to community.
- Provide backcountry hiker access to the northern area of the park and adjacent USFS land through the development of existing roads in the park.
- The proposed joint visitor contact station at the old Baca Ranch headquarters or on County Road T would attract more visitors and traffic and burden the community.
- Oppose the proposed backcountry access zone.
- Concerns that decisions about the Liberty Road are already being made without public comment.
- Concerns about hunting negatively affecting the community.

If bison are being removed from the Medano Ranch, please donate them to a Native American Community that wants them at the park's expense.

“I support the recommended Wilderness Designation of 51,000 acres.”

“Thank you for considering the unique needs of our community as you move forward with this important project. Please speak for us.”

Letter Group 3:

Four letters and Web responses were received that felt access to the national forest across the northern park boundary and elk overpopulation management was not adequately addressed in the plan and consequently is not consistent with cooperative planning. All these letters were nearly identical. A summary of a comment letter follows:

“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. You also failed to address the overpopulation of elk in the Draft Management Plan. These are issues that were brought to your attention early in your planning process but you have selectively decided not to adequately address these issues in your draft plan.”

National Forest Access and North Boundary Access

Access to new portions of the national park and national forest needs to be addressed in the GMP— hunting access, ability to carry firearms and game across NPS lands, public parking, and horse access.

- Liberty Road is clearly the only road that is presently in existence that accesses the national forest from the Baca subdivision through the park. This plan must be rewritten to finalize vehicle access to the national forest and allow the USFS to manage their lands.
- 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.

Elk

The extremely large elk population is not addressed in the preferred alternative or any of the alternatives. The overpopulation of elk is a huge issue affecting vegetation and wildlife populations and agricultural lands.

- Concerned about the ability of the CDOW to be able to manage the elk herd if wilderness is designated.
- There are contradictions in the EIS. 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 its affect on the park and adjacent lands.
- It would not be unreasonable for the Great Sand Dunes National Park to make this new section of land a national preserve instead of a national park and provide means to manage wildlife (a national preserve allows hunting). This plan must be rewritten to address this issue through a national preserve alternative.

COMMENTS FROM UNAFFILIATED INDIVIDUALS

Comments were received from 49 individuals not associated with any group or agency. The comments ranged from one sentence to several pages covering many topics. The following discussion organized their comments by the most common topics.

Access

Twenty individuals commented on access to the northwest corner of the park. Very few comments were specifically worded as in support of or opposition to northern access, and include:

- remove backcountry access zone
- in favor of northern access
- disapprove of two access point in north
- need access to USFS lands or NPS is restricting access to (and therefore management options of) USFS lands

The majority of the comments illustrate the complexity of the issue. Additional views in support of or opposition to access are implied in the points made in several letters, and include:

- no access through subdivision (or a specific road in subdivision)
- no private development should be able to block access to county roads
- support a trailhead at mountain front, no matter how one gets there
- need vehicular hunter access

Comments specific to Liberty Road include:

- use Liberty Road for access or there is already access via Liberty Road
- public should have unrestricted access on Liberty Road
- strongly oppose opening Liberty Road
- support small parking area and campground on Liberty Road

Many letters included recommendations for access or facilities associated with access, and include:

- do not encourage vehicular access beyond park boundary
- access on primitive road from County Road T or Route 17
- do not allow access to go farther than 1 mile from County Road T or Route 17
- add parking lot at Camino Real
- need parking area for horses
- bring visitors through USFS lands or park, but not subdivision
- have parking area at Baca and Medano ranches
- use existing ranch roads
- would favor a new USFS road
- shared access (based seasonally) between subdivision and USFWS

- maintain access on Liberty Road as have in years prior to last one

Alternative Selection

Eight individuals commented on their alternative preference. Most supported the preferred alternative. One supported the three public nodes alternative. One supported the dunefield focus alternative or would support the preferred alternative without access on Liberty Road.

Planning Process / Adequacy of Plan

Twelve individuals sent comments on the adequacy of the document and/or planning process. Two specific areas were called out as not adequately addressed in the plan and include northern access and elk management.

Wildlife Management/Hunting

Eleven individuals commented on wildlife management and/or hunting. The issue primarily revolved around managing the elk herd in the northwest portion of the park and on adjacent USFS lands. Comments include:

- need vehicular hunter access (same as above under northwestern access)
- ban all hunting and trapping
- opposed to hunting near the community
- introduce natural predators
- proposed legislation to change Baca Ranch from park to preserve to allow hunting
- game needs to be managed
- want to be able to hunt and carry a firearm – 1

Facilities

Twelve individuals commented on park facilities:

- in favor of all new roads and parking areas being located outside the park
- want primitive camping maintained or expanded
- want no new campgrounds in the park
- in favor of a new parking area at Sand Ramp trailhead, improved horse trailer parking, and locating the northwest visitor contact station outside of Crestone/Baca Grande

Bison

One individual commented on bison and was in favor of maintaining a herd.

Fragile and Sensitive Resource Areas

Nine individuals commented on this topic. Some specifically said to direct visitors away from these sensitive areas, like Deadman Creek. One indicated information in the plan was inadequate and provided additional information. Several individuals commented on cultural resources. Some support protecting

cultural resources through the use of the guided learning zone. Some requested scheduling a complete archeological survey as soon as possible.

Split Estates/Mineral Rights

Seven comments were received and all supported the idea to make purchase of subsurface mineral rights a high priority.

Medano Ranch

One individual commented on the ranch and suggested that it not be opened to the general public and could be used as an educational center.

Backcountry Zones

Three comments recommended keeping motorized vehicles and mountain bikes out of backcountry zones.

Shuttle System

Only one person commented on the proposed shuttle system and was in favor of it.

Dogs/Dog Kennel

Three individuals commented on this topic. Two wanted no dogs in the park and the other didn't want her experience with a dog in the park taken away.

Fire

Three comments expressed concern about visitors causing wildland fire.

Nonnative Species Management

Two individuals commented on nonnative species and both were in favor of managing the problem. One mentioned noxious weed transfer from horses and vehicles and the other was concerned about increased use near Deadman Creek.

WILDERNESS STUDY COMMENT SUMMARY

The Great Sand Dunes National Park and Preserve General Management Plan and Draft Environmental Impact Statement also contained a Wilderness Study with recommendations. The recommendation in the Wilderness Study is to designate approximately 51,000 acres of suitable lands in the expanded portion of the park. As a result, about 85% of the park and preserve would be designated wilderness.

The Wilderness Study is an independent effort, but was combined with the GMP for efficiencies and because of the similar planning processes of both efforts. The DEIS covers both the GMP and the Wilderness Study. Wilderness studies have their own public involvement procedures and requirements including public hearings. In conjunction with the public meetings for the GMP, official public hearings

were held for the Wilderness Study and comments were recorded by a court reporter. Written comments were accepted during the same comment period as the GMP/DEIS (May 1, 2006 to June 30, 2006). The following summarizes the hearings and written comments.

Wilderness Hearings

Crestone, CO May 15, 2006

Thirteen individuals and three groups provided testimony in support of the wilderness recommendation. The groups included San Luis Valley Ecosystem Council, Crestone Mountain Zen Center, and Crestone Spiritual Alliance. Comments in support of the recommendation include:

“...rare experience where you can go somewhere that is like the earth before people were on it.”
“...it will be a great thing that you folks extend your control and increase the wilderness area in the neighborhood here.”

“The more wilderness designation that we can get, the better we are.”

“...we cannot conserve for ourselves [Crestone] and say, this is ours. We have to make it accessible. It's public land”

“...for it to take an act of Congress to designate it as wilderness says that it is something very important and it needs to be preserved.”

“...hopefully this is a real opportunity to protect a large land base and connect it to the Sangre de Cristo Wilderness...and hopefully some other designations may also occur with other public land agencies...”

“...I think it preserves the environment which is very much in tune with the spiritual groups are about in terms of respecting our wilderness and solitude and our deep connection with nature.”

One individual was neutral on the recommendation. His main concern was access specifically from the Baca subdivision and the hope that some kind of hunting would be allowed.

A representative from Backcountry Horsemen discussed access to existing wilderness, particularly parking for horse trailers.

One individual was opposed to the recommendation. His concerns were:

“...they've [fire department] had experiences with wilderness type situations where they cannot go in to help...”

“...Manage it the way you are now and that way you can go in there with [a] helicopter or some sort of a motorized vehicle to help people when they're injured...”

Alamosa, CO May 16, 2006

Nine individuals testified in support of the wilderness recommendation. Comments in support of the recommendation included:

“...incredible intrinsic value...”

“...designation of wilderness is the last tool we have in this country, if not the only tool, to express our respect to our earth and nature.”

“The recommendations...have special connections to the Baca Wildlife Refuge...wilderness is especially appropriate to affect the wildlife refuge and its duties of wildlife protection.”

“I like the idea that you're going to provide a deeper level of protection for the area.”

Six individuals were opposed to the recommendation. Their concerns included:

“I feel that it will hamper CDOW ability to help control elk populations...”

“I am generally in favor of wilderness areas. However, at this time I don not think the Park Service needs to have designated wilderness area because it will tie their hands on what they can do. They won’t be able to use motorized vehicles to manage the park...”

“I think it’s going to cause an access problem...”

“I am against the designation in that particular area.”

“...now a problem in that area of too large of herds...and there is no way of game management if this goes into a wilderness area.”

“..about two-thirds or half the herd moved over there from hunting pressure. They need to be moved back.”

Westcliffe, CO May 17, 2006

Six individuals provided testimony in support of the wilderness recommendation. Comments in support of the recommendation include:

“It [recommendation] helps maintain the cultural legacy that we have with the ranch here. It also helps us maintain the ecological values that that huge piece of land provides...”

“...when I hear people say that they only want quiet, there is always a place to find the quiet.”

“...it will not adversely impact and may actually assist us, as horseback riders, to be able to have it in wilderness...”

One person, a county commissioner in Custer County, did not support the recommendation. His concern included:

“My experience with rural government and rural management of public property has been that the boots on the ground do the best management. Congress is not as good at it as the locals are. I see no reason to let Congress suddenly step in and do a management role that’s been functioning quite well on a local level.”

Denver, CO May 19, 2006

Ten individuals provided testimony in support of the wilderness recommendation. Comments in support of the recommendation included:

“I think wilderness is the best way to protect the resources in the park for the long term, both for natural and ecological processes and for low-impact recreation.”

“...maintaining it [park] in its pristine state, so that natural processes can function and people can experience, through human-powered means, the wild nature that Colorado offers in the San Luis Valley is super important.”

“...the wilderness eligibility assessment that was conducted with this was one of the better ones that I’ve seen.”

“There’s a number of scientifically unique properties of the hydrology at the Great Sand Dunes...that are found maybe in only this area, or at least rarely anywhere in the world.”

“There are a number of archeological resources, particularly on the western part of the sand dunes that need to be protected.”

“It would be a good thing in my opinion to protect the land and to protect the resources. As a horseback rider, I would hope that in the process of wilderness designation that there’s a recommendation that horseback and stock travel continue to be allowed in this area.”

“It’s so nice to have some things untouched by man and society.”

“I am a big supporter of wilderness ... All of the eastern [US] wilderness were used by man and then brought back to what they were. I thought that this was a great opportunity to possibly see that happen here I am a little concerned about how they will be handling this area with the elk management and the bison management when a wilderness is established, because it’s that much harder to do hand-on manipulation of the environment if it’s wilderness.”

One individual representing CDOW did not support the recommendation. His concern was:

“...normally we’re very supportive of wilderness. In this particular instance, we have two issues with the wilderness designation. One is the elk population...”

“We have a population that is just shy of about 6000 animals, which is way over and above our population objective of 1500. And within that wilderness designation is the areas where elk tend to congregate. That would provide a sanctuary where they could not be pushed out of, so that you could then effect management upon them.”

“We have, west of Highway 17, extremely valuable agricultural lands that elk are going to, and have the potential to impact. And, statutorily, the Division of Wildlife is responsible for damage by big game. We have a situation where we have the potential for extreme damages...millions of dollars, which could blow our entire game-damage budget...And it could begin to impact our other programs as well, which is very unsettling for us.”

“...we would like to see some alternatives in that proposed wilderness area for maybe Backcountry Adventure to still allow us to, one, evaluate...the research...the then be able to evaluate harassment strategies to move those elk around in that environment and see if we can expose them to harvest outside the park.”

“The Forest Service has concerns that they’ve expressed to us with regard to managing that elk population.”

We also have concerns with the bighorn sheep that use that area and the mule deer that use that area. Both populations have been suppressed. We believe that it’s due to the excess number of elk that are in that area.”

Tribal Consultation and Correspondence

The wilderness recommendation was not mentioned in the letters received from the Comanche Tribe and Pueblo of Laguna, nor were there comments in support or opposition to wilderness during consultation with the Southern Ute Tribe and the Jicarilla Apache Tribe.

Written Comments from Agencies and Organizations

Written comments were received from six federal, state and local agencies. The USFS Rio Grande National Forest commented *“...it seems that the proposed wilderness designation is unrealistic.”* They were referring to the current condition of lands acquired from the Baca Ranch and the extensive restoration they felt would be necessary to make them suitable for wilderness in any alternative. CDOW expressed concerns that wilderness designation would make it more difficult to move elk out of the park

into areas where hunters can affect some level of harvest. The Saguache County Board of Commissioners unanimously supported the recommendation. Three agencies (USFWS, San Luis Valley National Wildlife Refuge Complex, U.S. Environmental Protection Agency, and the Colorado Historical Society) had no comments on the wilderness proposal.

Six of the nine organizations commenting on the plan provided written comments on wilderness. Two organizations, Baca Grande Property Association and The Nature Conservancy, supported the recommendation with no other comments. The Foundation for North American Wild Sheep supported the recommendation, but had concerns about guzzlers (water sources) being removed. Four organizations (The Wilderness Society [cosigned by San Luis Valley Ecosystem Council, Sinapu, Colorado Environmental Coalition, Rocky Mountain Recreation Initiative, Upper Arkansas and South Platte Project, Southern Rockies Ecosystem Project, and San Juan Citizens Alliance], Colorado Mountain Club, Center for Native Ecosystems, and Upper Arkansas and South Platte Project) expressed essentially the same position on the wilderness recommendation. However, they all recommend additional lands they feel are wilderness-eligible in the northwest and southwest corners also be added to the NPS recommendation. Those additional lands would essentially encompass more land around the Medano Ranch the land north of Cow Camp Road. The Backcountry Horsemen did not support wilderness designation because the area then becomes susceptible to crowding.

Comments of Nearly Identical Content (Form/Campaign Letters)

Three sets of nearly identical, form or campaign responses were received, and two made comments on the wilderness proposal. The first set focused on the wilderness recommendation. Letters, e-mails, and Web responses were received from 3,309 individuals that were similar to The Wilderness Society recommendations and supported the wilderness recommendation and requested additional lands be recommended in the northwest and southwest corners of the park. Excerpts from a standard letter follows:

“I commend your draft plan’s preferred alternative to add nearly 51,000 acres of wilderness to Great Sand Dunes National Park and Preserve.”

“I strongly urge you to add sand sheet lands in the northwest corner of the park to your wilderness proposal.”

“Please also propose wilderness protection for wilderness-quality lands surrounding Medano Ranch. “

The second set of 13 responses primarily focused on access to the park from the north, specifically through the Baca Grande subdivision. However, made the following comment on wilderness:

“I support the recommended wilderness designation of 51,000 acres.”

Comments From Unaffiliated Individuals

Comments on the GMP and Wilderness Study were received from 49 individuals not associated with any group or agency. Twenty-four individuals commented on the wilderness proposal. Sixteen supported the recommendation. Seven of those wanted to see the wilderness designation expanded, similar to the Wilderness Society recommendations. One individual did not support the recommendation because this would remove the tools needed by CDOW to manage the elk population. Twenty-four did not mention the wilderness recommendation.

