



Chapter Five: Consultation and Coordination

SUMMARY OF PUBLIC INVOLVEMENT, INCLUDING SCOPING

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 advisory 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 the 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

Public Meetings on the Alternatives

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. Development of the preferred alternative is discussed in appendix E. 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

The draft General Management Plan / Wilderness Study / Environmental Impact Statement (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 this decision until a cooperative planning effort specific to the issue can be concluded.

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 references 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 favored 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 opposing the proposal in the preferred alternative wherein 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 fragile and sensitive areas (such as Deadman Creek and riparian areas) within the wilderness 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 ranches, 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. 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 favored including 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.

Comment letters and summaries of comments received, with responses, are included later in this chapter.

CONSULTATION

Consultation with most agencies and tribes for the development of this GMP/wilderness study was initiated in 2004. A series of interagency meetings (for federal and state agencies) on the GMP/wilderness study 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 ACHP'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 the 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 will not occur during the life of the GMP. Both letters are included in a subsequent section of this chapter.

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 about elk management and the permitting system for hunters and other USFS users.

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/EIS to the USFWS, along with a letter requesting concurrence, in April 2006. Comments by the USFWS on the draft GMP/EIS prompted a meeting between the National Park Service and the USFWS on September 20, 2006, to discuss revised treatment of the southwestern willow flycatcher, yellow-billed cuckoo, bald eagle, and Mexican spotted owl in the final GMP/EIS. A revised memo requesting concurrence with the determinations for federally threatened, endangered, and candidate species, along with relevant sections of the revised GMP/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.

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 its previous position. 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 in table 27. Additional consultation took place regarding cultural resources in the GMP/WS/EIS. The Colorado SHPO issued a letter of concurrence on January 18, 2007.

TABLE 27. FUTURE ACTIONS REQUIRING COMPLIANCE WITH SECTION 106 OF THE NHPA

Action	Section 106 Compliance
<ul style="list-style-type: none"> New bicycle lanes along the park entrance road 	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"> Entrance station replacement in a new location near the park entrance 	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"> Adaptive use of Medano Ranch headquarters for an NPS administrative center and for public uses on a limited, scheduled basis 	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"> Management and maintenance (including lack of maintenance) of other buildings and structures including but not limited to the superintendent's house, cabins in wilderness areas, stamp mill, etc. 	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"> New access road and trailhead in the backcountry access zone in the northern portion of the park 	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"> New trails in undetermined locations within the backcountry adventure and guided learning zones 	The National Park Service will comply with section 106 in accordance with 36 CFR 800 for all proposed new trails.
<ul style="list-style-type: none"> New hiking/biking path connecting Pinyon Flats campground to dunes parking area and visitor center 	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.

TABLE 27. FUTURE ACTIONS REQUIRING COMPLIANCE WITH SECTION 106 OF THE NHPA

Action	Section 106 Compliance
<ul style="list-style-type: none"> Other projects and management plans (i.e., elk management plan, wilderness management plan, noxious weed management plan, commercial services management plan) 	<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>

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 consult further. Two tribes, the Comanche Tribe and the Pueblo of Laguna, responded to the draft GMP/ WS/DEIS 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 by the Tribe was for the National Park Service to keep the plan as flexible as possible so the National Park Service can react as conditions change in the future.

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 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 considers bison 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 suggested they would send formal comments on the draft GMP, which would include new wording for the bison issue.

**LIST OF AGENCIES AND ENTITIES CONTACTED FOR INFORMATION
OR SENT A COPY OF THE PLAN**

Federal Agencies

Advisory Council on
Historic Preservation
Bureau of Land
Management
Bureau of Reclamation
Federal Highway
Administration
U.S. Environmental
Protection Agency
U.S. Fish and Wildlife
Service
U.S. Forest Service
U.S. Geological Survey
U.S. Natural Resources
Conservation Service
USDA Resource
Conservation and
Development

Tribes

Cheyenne and Arapahoe
Tribes of Oklahoma
Comanche Indian Tribe of
Oklahoma
Hopi Indian Tribe
Jicarilla Apache Indian Tribe
Kiowa Tribe of Oklahoma
Navajo Nation
Northern Arapaho Indian
Tribe
Northern Cheyenne Indian
Tribe
Pine Ridge Oglala Lakota
Indian Tribe
Pueblo of Acoma
Pueblo of Cochiti
Pueblo of Jemez
Pueblo of Picuris
Pueblo of San Juan
Pueblo of Santa Clara
Pueblo of Taos
Pueblo of Zia

San Juan Southern Paiute
Tribe
Southern Ute Tribe
Uintah and Ouray Ute Tribe
Ute Mountain Ute Tribe
White Mesa Ute Tribe

**U.S. Senate / House of
Representatives**

Senator Wayne Allard
Senator Ken Salazar
Representative Bob
Beauprez
Representative Diana
DeGette
Representative Joel Hefley
Representative Scott
McGinnis
Representative Marilyn
Musgrave
Representative John T.
Salazar
Representative Thomas
Tancredo
Representative Mark Udall

State Agencies

Colorado Division of Water
Resources
Colorado Division of
Wildlife
Colorado Historical Society/
State Historic
Preservation Office
Colorado State Forest
Service
Colorado State Land Board
Colorado State Parks

**Other Agencies and
Organizations**

Alamosa County, Colorado
Baca Grande Library—
Crestone, Colorado
Baca Grande Water and
Sanitation District
Colorado College Library
Colorado Mountain Club
Friends of the Dunes
National Parks and
Conservation Assoc.

Saguache County, Colorado
San Luis Valley Ecosystem
Council
Southern Peaks Public
Library—Alamosa,
Colorado
The Nature Conservancy
The Wilderness Society
West Custer County
Library—Westcliff,
Colorado

REVIEW OF THE DRAFT GENERAL MANAGEMENT PLAN REVISION / WILDERNESS STUDY / ENVIRONMENTAL IMPACT STATEMENT

This section includes substantive comments received during the public review period from May 1 to June 30, 2006, on the Draft General Management Plan Revision / Wilderness Study / Environmental Impact Statement. Approximately 300 copies were sent to individuals, organizations, agencies, and tribes. The draft document was also posted on the National Park Service Web site.

WRITTEN COMMENTS

In accordance with CEQ regulations implementing NEPA, all letters from federal, state, or local agencies, and American Indian tribes, as well as all substantive public comments, must be reprinted in the final environmental impact statement. Responses must be provided to substantive comments. Comments are substantive if they:

- question, with reasonable basis, the accuracy of information in the environmental impact statement

- question, with reasonable basis, the adequacy of the environmental analysis
- suggest different viable alternatives
- cause changes or revisions in the proposal

In other words, comments are substantive if they raise, debate, or question a point of fact or a point of policy from an alternative. Comments in favor or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive.

Letters and Web comments from agencies and tribes on the Great Sand Dunes National Park and Preserve Draft General Management Plan Revision / Wilderness Study / Environmental Impact Statement are reprinted here in full, along with NPS responses to substantive comments. Substantive comments from organizations and individuals are summarized for brevity. Full letters, Web comments, and meeting transcripts are a part of the project administrative record.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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JUN 27 2006

Suzy Stutzman, Lead Planner
National Park Service
Intermountain Region
12795 West Alameda Parkway
P.O. Box 25287
Denver, CO 80225-0287

RE: Great Sand Dunes National Park and
Preserve, General Management Plan and
Wildness Study Draft EIS, Alamosa and
Saguache Counties, Colorado

Dear Ms. Stutzman:

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

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

1.

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

Response 1: Goals and desired future conditions are established within the GMP, but analysis is conducted at a more detailed level of planning. Big and Little Springs are unique gaining streams. It would be difficult to find another stream with similar characteristics. The current water regime has been in place for over 100 years. Decisions associated with reverting the system back to a "natural" water regime will be driven by water rights and the Closed Basin Project. "Natural" will need to be defined since the system within park boundaries would be depositing into an altered system outside the park. Additional studies and research would be required to determine if restoration is even possible, and would need to be designed for this unique system, not to mimic another system. This type of research and study is beyond the scope of the GMP and would be conducted in a separate study. Please refer to "Desired Conditions for the Dunes" and "Biological Diversity, Natural Resources, and Diversity Strategies."

areas. These sensitive areas could be compacted by foot traffic or result in the introduction of non-native plant species if a less controlled visitor plan were adopted for the ecologically fragile lands surrounding Big and Little Springs.

2.

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

Response 2: As stated in response 1, nonnative plant species management is beyond the scope and analysis of the GMP. This would be conducted under a resource management strategy or another implementation plan. Please refer to "Desired Conditions for the Dunes" and "Biological Diversity, Natural Resources, and Diversity Strategies."

3.

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

Response 3: As stated in response 1, an elk management plan is beyond the scope and analysis of the GMP. An elk management plan will address elk management options including hunting in cooperation with the Colorado Division of Wildlife, the U.S. Forest Service, and U.S. Fish and Wildlife Service.

Results from the first year of the elk study indicate there are about 2,000 fewer animals than originally estimated, and that the size of the herd has declined by about 1,000 animals over the last six years.

Access for hunting on U.S. Forest Service land and in the preserve on Liberty Road is addressed and allowed under certain conditions—please refer to the "Management Zones," "Administrative Zone" section of the GMP.

4.

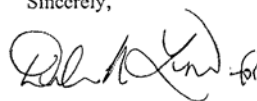
Tribal Consultation In March 2005, the Hopi Tribe indicated to the Park Service that the 'lakes' situated within the dunes are important to the Tewa people living on the Hopi Reservation. We suggest the Final EIS present the results, if any, of the Park Service's and the Hopi Tribe's consultation process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

Response 4: The Hopis were contacted during scoping and the National Park Service received a response during scoping. The Hopis received a copy of the draft GMP/WS/EIS, but did not respond during the comment period on the draft GMP/WS/EIS.

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

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

Sincerely,



Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection
and Remediation

Enclosure:

cc: Peter Clark, Rio Grande National Forest, Monte Vista, Colorado
Leigh Kuwanwisiwma, Hopi Tribe, Kykotsmovi, Arizona



U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements
Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

2064



U.S. Fish and Wildlife Service

San Luis Valley National Wildlife Refuge Complex
 9383 El Rancho Lane • Alamosa, CO 81101
 Phone (719) 589-4021 • Fax (719) 587-0595

July 11, 2006

Steve Chaney, Superintendent
 Great Sand Dunes National Park and Preserve
 11500 Highway 150
 Mosca, Colorado 81146-9798

Dear Mr. Chaney:

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

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

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

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

- 1) **The use is not manageable within available budget and staff.** Construction and maintenance of new roads are out of the realm of feasibility at the refuge's current level of funding, as is the conversion of any existing roads to this use.
- 2) **The use is not manageable in the future within existing resources.**

- 3) **The use does not contribute to the public's understanding and appreciation of the refuge's natural or cultural resources, nor does the use benefit the refuge's natural or cultural resources.** The refuge is rich in natural and cultural resources. Without thoughtful interpretation, vehicular access across the refuge in order to reach the Park's Backcountry Access Zone will not contribute to public understanding and appreciation for those resources. Without a significant visitor management effort such access can easily jeopardize these resources.

5.

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

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

Sincerely,

Michael Blenden
Project Leader

Enclosures

Cc: Rick Coleman – Refuges/Region 6
Dave Wiseman – Refuges/Region 6
Michael Spratt – Refuges/Region 6

Response 5: Based on this letter, the following letter, and further discussions with the U.S. Fish and Wildlife Service, the preferred alternative in the final GMP has been modified. The area abutting the refuge has been changed to backcountry adventure zone no longer allowing the possibility of public vehicle access from the refuge. Please refer to map and description of the preferred alternative.



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Mountain-Prairie Region

MAILING ADDRESS:
Post Office Box 25486
Denver Federal Center
Denver, Colorado 80225-0486

STREET LOCATION:
134 Union Blvd.
Lakewood, Colorado 80228-1897



NWRS/ALM 5.20
Mail Stop 60130

AUG 11 2006

Steve Chaney, Superintendent
Great Sand Dunes National Park and Preserve
11500 Highway 150
Mosca, Colorado 81146-9798

Dear Mr. Chaney:

I am writing to you concerning the letter dated July 13, 2006, that you received from Ron Garcia, Refuge Manager, Baca National Wildlife Refuge (Refuge), and Mike Blenden, Project Leader, San Luis Valley National Wildlife Refuge Complex (Complex), commenting on the Draft General Management Plan/Wilderness Study/Environmental Impact Statement for Great Sand Dunes National Park and Preserve (Park). The need for this letter of clarification was identified at a meeting on July 28, 2006, which included you, National Park Service planning staff, Michael Blenden, and Ron Garcia.

The July 13 letter described why building new roads or using already existing roads on the Refuge solely to provide visitor access to the Backcountry Access Zone (identified in the Draft General Management Plan) is not an appropriate use of a National Wildlife Refuge. The letter did not address hypothetical, wildlife-dependent use that may result from our future planning efforts. In the July 28 meeting, you described your need to know from the United States Fish and Wildlife Service (Service) whether future development of wildlife-dependent public use on the Refuge may or may not facilitate access to the Backcountry Access Zone during the 15-20 year life of the Park General Management Plan.

The question is whether or not it is possible that any future, wildlife-dependent public use of the Refuge will be sited in a way to be compatible with Refuge purposes and provide access to the Backcountry Access Zone. Based upon the professional judgment of the management staff of the Complex and from specialists in our Regional Office, I can say that at least for the life of the Park's General Management Plan, the Service will not be developing any wildlife-dependent public use on the east side of the Refuge that would require visitors to traverse substantial amounts of refuge habitat and that would subsequently facilitate access to the Backcountry Access Zone on the Park. Wildlife-dependent public use may eventually occur on the east side of the Refuge and even near the Park's Backcountry Access Zone, but bringing visitors to these

Steve Chaney, Superintendent

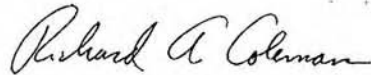
2

points using the Lexam Road or constructing a new road from the northern, western, or southern boundary would be cost prohibitive and incompatible with the purpose of the Refuge.

I hope this adds the clarity you need to state in the General Management Plan that access to the Backcountry Access Zone from roads on the Refuge is not a practical option.

Thank you for considering the needs of the National Wildlife Refuge System in developing the General Management Plan for Great Sand Dunes Park and Preserve. Please let me know if you need more information or assistance with this or any other matter of mutual interest. You may telephone me at (303) 236-4303.

Sincerely,

A handwritten signature in cursive script that reads "Richard A. Coleman".

Richard A. Coleman, Ph.D.
Assistant Regional Director
National Wildlife Refuge System



FISH AND WILDLIFE SERVICE
Ecological Services
Colorado Field Office
P.O. Box 25486, DFC (65412)
Denver, Colorado 80225-0486

JUL 24 2006

Dear Mr. Chaney:

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

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

- 6.**

1) General Comment - The rationale for "dismissing" species is not clear in either the letter or the GMP/EIS. Is the dismissal based on lack of habitat for these species, or is it based on the likelihood that impacts will not occur? The dismissal of the yellow-billed cuckoo, southwestern willow flycatcher, bald eagle, and Mexican spotted owl should be discussed further with the Service.

- 7.**

2) Table 4, Boreal Toad – Please note that the boreal toad is no longer a candidate for Federal listing.

Response 6: Based on further consultation with the U.S. Fish and Wildlife Service, the rationale for dismissal of species has been further clarified in the final GMP/WS/EIS to differentiate between absence of the species or habitat versus the lack of anticipated impacts to the species. Please see specific comments and responses below.

Response 7: The boreal toad classification as a candidate for federal listing has been deleted.

8. 3) Table 4, Gunnison Sage Grouse - Please note that the Gunnison Sage Grouse is no longer a candidate species for Federal listing.
9. 4) Table 4, Yellow-Billed Cuckoo - We do not agree with the statement that there is "not suitable habitat in the park". We should discuss this further.
10. 5) Table 4, Southwestern Willow Flycatcher - We do not agree with the statement that there is "not suitable habitat in the park". We should discuss this further.
11. 6) Table 4, Bald Eagle - If bald eagles are using the San Luis Lakes State Park, which is relatively close to the park line, we should probably have a more thorough analysis of the potential for the bald eagle to use the park.
12. 7) Table 4, Mexican Spotted Owl - We do not think that suitable fields surveys have been done to be able to say that there are no Mexican spotted owls in the park.
13. 8) Page 1, Uncompahgre Fritillary Butterfly - Sovell 2005 is not in the reference section.
14. 9) Page 3, Yellow-Billed Cuckoo - The text says that Rawinski (2004) reported a cuckoo in the park in 1984, but Rawinski is not in the references. If there was a report of the cuckoo in the park, why is this species dismissed from analysis?
15. 10) Page 3, Yellow-Billed Cuckoo - The Service generally considers a patch size of greater than 10 acres of riparian habitat to be large enough for evaluation as habitat for the cuckoo. We agree that the park has narrow riparian corridors, but we should evaluate the patch sizes within the park more thoroughly.
16. 11) Page 3, Southwestern Willow Flycatcher - The Service generally considers a patch size of 0.25 acres or greater that contains dense riparian vegetation that is more than 5 feet in height to be suitable habitat for the flycatcher. Small stringers of riparian vegetation can be suitable if they are connected to a larger block or if a number of small stringers are in close proximity to each other.
17. 12) Page 4, Bald Eagle - Same comment as #7.
18. 13) Page 4, Mexican Spotted Owl - As stated in Comment # 8, we do not think that suitable fields surveys have been done to be able to say that there are no Mexican spotted owls in the park. Areas that should be considered as spotted owl habitat include mixed conifer forests (ponderosa pine and Douglas-fir, and often white fir) on steep slopes (greater than 40%), and often in a canyon or rocky outcropping setting.

Response 8: The Gunnison sage grouse classification as a candidate for federal listing has been deleted.

Response 9: Willow/cottonwood stands, which may serve as potentially suitable habitat for this species, do occur along the Medano, Sand (particularly lower), Little Medano, and Mosca creeks. Since potentially suitable habitat is present, the GMP/EIS has been revised to consider that the potential for occurrence of the species does exist (although there is no documented use of the habitat by these birds), and therefore, potential impacts have been analyzed and a determination of "may affect - is not likely to adversely affect" has been added. Please refer to the "Threatened and Endangered Species" sections of chapters three and four.

Response 10: The habitat requirements for the southwestern willow flycatcher are similar to those of the yellow-billed cuckoo. Since potentially suitable habitat is present, the GMP/EIS has been revised to consider that the potential for occurrence of the species does exist, and therefore, potential impacts have been analyzed and a determination of "may affect - is not likely to adversely affect" has been added. Please refer to the "Threatened and Endangered Species" sections of chapters three and four.

Response 11: Suitable bald eagle winter roost sites exist along Sand Creek. Since potentially suitable habitat is present in scattered cottonwood stands along Sand Creek, as well as the occurrence of the winter roost site, the GMP/EIS has been revised to consider that the potential for occurrence of the species does exist, and therefore, potential impacts have been analyzed and a determination of "may affect - is not likely to adversely affect" has been added. Please refer to the "Threatened and Endangered Species" sections of chapters three and four.

Response 12: Based on slope, aspect, and vegetative cover, potential habitat for the Mexican spotted owl occurs along the western slope of the Sangre de Cristo range in the eastern portion of the park and preserve. The National Park Service will conduct a separate NEPA analysis for the development of new trails through the area potentially supporting the Mexican spotted owl and conduct owl-specific surveys to support that effort. A determination of "may affect - not likely to adversely affect" is appropriate. Refer to the "Threatened and Endangered Species" discussion in chapters three and four.

Response 13: Sovell reference has been added to bibliography.

Response 14: Please see comment 9, The Rawinski report has been added to the bibliography.

Response 15: Please see response 9.

Response 16: Please see response 10.

Response 17: Please see response 11.

Response 18: Please see response 12.

19.

20.

15) Page 4, Canada lynx – The elevational range for the lynx is typically 8,000 to 12,000 feet (not 9,000 to 14,500 feet) and the habitat is typically a closed-canopy forest (not open canopy).

Sincerely,

Donc. Jeune

cc: FWS-ES-CO (T. Ireland)

Reference: Project\NPS\NPS_SandDune\GMP_FWSComments

Response 20: The U.S. Fish and Wildlife Service is satisfied with the current treatment of the Canada lynx in the EIS; however, a statement has been included in the mitigation measures for Canada lynx that indicates that if den sites are identified in the future, protective measures would be established through further discussions and consultation with the U.S. Fish and Wildlife Service.



United States
Department of
Agriculture

Forest
Service

Rio Grande National Forest

1803 West Hwy 160
Monte Vista, CO 81144
719-852-5941

2024

File Code: 1900
Date: June 30, 2006

Steve W. Chaney
Superintendent
Great Sand Dunes National Park and Preserve
11500 Hwy 150
Mosca, CO 81146

Dear Steve:

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

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

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

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

(1) Cooperating Agency

21.

The issues articulated in this letter are of great importance to me in my responsibilities to appropriately manage the National Forest Baca Mountain Tract. Therefore, I am requesting that you grant me Cooperating Agency status under 40 CFR 1501.6, to ensure that these concerns are fully considered in your analysis and GMP. Although we have been working with you on an informal basis up to this point, I feel it is appropriate to request formal Cooperating Agency status in this analysis to ensure that our two agencies work more closely together on the development of the final GMP. I also encourage you to request that both the US Fish and Wildlife Service, as a neighboring federal agency involved with access to the National Park, and the Colorado Division of Wildlife, with expertise and responsibility for elk management, be invited to become Cooperating Agencies as well.

Response 21: To accomplish the intent of the cooperating agency section of NEPA, the U.S. Forest Service would have needed to become a cooperating agency earlier in the planning process. At this late stage, there would be little benefit to the U.S. Forest Service as a cooperating agency. The only noteworthy difference would be the requirement to allow the U.S. Forest Service the opportunity to review and comment on language changes in the final GMP/WS/EIS prior to the document being released to the public, which will happen without entering into a formal agreement. The U.S. Forest Service has agreed to this approach and requested that the National Park Service be a cooperating agency in their forest plan amendment planning effort for the Baca Mountain Tract.



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JUL 11 03 2006 01:09PM P2

FAX NO. : 7197378310

FROM : GRSB

I feel strongly that the three affected federal agencies and the CDOW should be closely working together to ensure that each agency's goals and mission are being met. This would also dovetail well with the current efforts of Saguache County and the Sonoran Institute to come to a multi-agency resolution of access to the National Park and the National Forest.

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

(2) Public Access to the National Forest

22.

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

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

23.

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

(3) Wilderness

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

Response 22: The GMP does not preclude public vehicle access, nor does it guarantee such access. The National Park Service has determined that the decision should not be made at this time. There is not sufficient information to assess impacts of motorized public access to the national forest until it is known what the U.S. Forest Service plans are for the area. The Baca Grande subdivision and Crestone community are also involved in a planning process involving access options. The GMP leaves flexibility in the preferred alternative to consider vehicle access options in cooperation with the U.S. Forest Service in the future as management options are assessed.

Response 23: Additional text has been added to the GMP to further describe Liberty Road, please refer to chapter one, "Relationship to GMP and Other Planning Efforts, Liberty Road."

Tract through our Forest Plan amendment analysis. My initial assessment is that it is unlikely that the Baca Mountain Tract would meet the wilderness suitability criteria used by the Forest Service.

24.

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

Response 24: The National Park Service conducted a wilderness suitability study as part of this planning process. The proposed wilderness does meet NPS criteria for wilderness. Some human development does not disqualify land from wilderness designation. Restoration actions for wilderness are not within the scope of the GMP; however, the GMP does include a strategy to develop a wilderness management plan. Please refer to "Appendix G: Wilderness Study and Recommendation."

(4) Range of Alternatives

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

25.

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

Response 25: Please see responses 2, 3, and 24.

26.

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

Response 26: Please see response 22.

Developing this alternative would provide the National Park Service with an alternative(s) to develop management options for the public entering the National Park from a parking lot located on the National Forest. This alternative would result in reduced impacts to the National Park from new roads and parking currently proposed in the GMA Preferred Alternative. Any parking

lot and associated trail system into the National Park could be developed collaboratively between our two agencies, including mitigation measures to minimize visitor impacts to the National Park.

(5) Elk

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

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

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

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

29. The EIS should clearly describe both National Park Service and Forest Service obligations under the ANILCA to provide access to private in-holdings across federal lands and how this may affect the GMP. The EIS should research and provide an assessment of the future plans for these private in-holdings.

(8) Accessibility

30. I applaud the National Park Service's commitment to accessibility provided in the GMA, p.29, under Desired Conditions – Park Accessibility which is a mutually shared commitment by the Forest Service. However, I am concerned that the current north Liberty Road entrance to the National Park and the Forest Service lands, designed to prevent horses, is preventing people with disabilities from entering the National Forest. Because this is the current access to the National Forest, this access should be in legal compliance with Section 504 of the Rehabilitation Act of 1973 and the Architectural Barriers Act of 1968 Accessibility Standards provision 404.2.3 which provide for minimal requirements for wheel chair access. The GMP should ensure that all access facilities to the National Forest through the National Park comply with these requirements.

Response 27: As stated in response 3, an elk management plan will address elk management options in cooperation with the Colorado Division of Wildlife, the U.S. Forest Service, and U.S. Fish and Wildlife Service.

Results from the first year of the elk study indicate that the elk population is significantly smaller than originally estimated (please see response 3), and that the herd is at a level well below "carrying capacity," or the number of animals the area's habitat can support.

The next two years of the study will focus on assessing the impacts of elk grazing on grasses, shrubs, and trees within the national park, national wildlife refuge, adjacent national forest, and The Nature Conservancy lands. Efforts will also be aimed at refining estimates of ecological carrying capacity and assessing the health of the herd.

Response 28: The National Park Service cannot implement construction of a road or parking area in the backcountry access zone unless Saguache County constructs 0.2 mile of road on its right-of-way that is contiguous with the national park boundary or develops another right-of-way to the boundary, as explained later in the paragraph to which you refer.

Response 29: The provisions in Alaska National Interest Lands Conservation (ANILCA) regarding access to private inholdings do not apply to the National Park Service, except in Alaska. However, the National Park Service will continue to provide access to the inholdings on U.S. Forest Service land through either Cow Camp Road or Liberty Road, depending on the results of the joint planning effort referenced in the GMP.

Response 30: The GMP states under the preferred alternative that if no long-term solution for public vehicle access is found, the National Park Service will install gates for horses in the northern portion of the park. Language has been added that these gates would also be pedestrian and wheelchair accessible. The current situation is temporary and interim.

31.

(9) Maps

Please include the wording "Baca Mountain Tract" on all maps showing the "Rio Grande National Forest Addition." This will help the public recognize the Baca Mountain Tract Forest Plan amendment analysis which is concurrent with this GMP analysis.

Also, please show the existing Liberty Road crossing the National Park in the GMA on the map on p. 55.

It is difficult to see the existing Liberty Road because it is covered by the Forest Service/National Park Service boundary on all maps. It would be clearer to the reader if the existing Liberty Road was shown on all maps adjacent to the boundary line rather than under it as it is currently shown.

Response 31: Maps have been relabeled as suggested. Maps have also been revised to illustrate Liberty Road across the park and along the National Park Service/U.S. Forest Service boundary.

32.

(10) Noxious Weeds

I would like to see noxious weeds management specifically addressed in the GMP with a map of the current condition. Noxious weed management needs to be addressed in a cooperative manner.

Response 32: Please see response 2.

I compliment you on the tremendous amount of work you have done on this planning effort. I appreciate the working relationship we have enjoyed to date and I look forward to working with you as a cooperative agency to address the above concerns and finish the GMP.

Sincerely,

Cindy Rivera, Acting

for

Peter L. Clark
PETER L. CLARK
Forest Supervisor/Center Manager

cc:

Tom Spezze - Colorado Division of Wildlife
Mike Blenden, U. S. Fish and Wildlife Service



COLORADO
HISTORICAL
SOCIETY

The Colorado History Museum 1300 Broadway Denver, Colorado 80203-2137

May 8, 2006

Steve W. Chaney
Superintendent
Great Sand Dunes National Park and Preserve
11500 Highway 150
Mosca, CO 81146-9798

Re: General Management Plan and Wilderness Study (CHS# 47837)

Dear Mr. Chaney:

Thank you for your recent correspondence dated April 14, 2006 (received by our office on April 17) regarding the project noted above.

Previous correspondence with your agency has indicated your office's intent to use the NEPA process and documentation to comply with the requirements of Section 106 of the National Historic Preservation Act (NHPA) as stipulated in 36 CFR 800.8(c) (NPS letter dated January 5, 2005).

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

General Management Plan and Wilderness Study (CHS# 47837)

Response 33: In a subsequent meeting with the Colorado Historical Society/State Historic Preservation Society (SHPO), it was determined that their comments were written with the misunderstanding that the National Park Service was using the GMP/EIS to satisfy its section 106 requirements, based on language in the initial NPS letter dated January 5, 2005, and reinforced with language in the GMP/DEIS. Thus, the Colorado SHPO responded to the National Park Service with references to 36 CFR 800.8 (c) in its comment on the GMP/DEIS, and other comments about shortcomings such as inadequate identification of cultural resources. The National Park Service clarified, in further consultation with the SHPO, that it intends that the GMP/DEIS be a conceptual planning document that outlines broad management directions such as zoning, with only a few specific projects identified. The National Park Service did not intend to use the GMP/EIS to satisfy its section 106 compliance per 36 CFR 800.8, and fully recognizes that it will need to comply with section 106 for specific projects in the future. Clarifying language has been added to "Impacts to Cultural Resources and Section 106 of the National Historic Preservation Act" section and text throughout the final GMP.

2008

34.

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

Response 34: Please see response 33.

35.

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

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

Response 35: Table 27 has been revised to clarify section 106 requirements for specific projects in the preferred alternative.

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

Sincerely,



Georgianna Contiguglia
State Historic Preservation Officer

GC/GAW

2020

STATE OF COLORADO
 Bill Owens, Governor
 DEPARTMENT OF NATURAL RESOURCES
**DIVISION OF
 WILDLIFE**
 AN EQUAL OPPORTUNITY EMPLOYER
 Bruce McCloskey, Director
 6060 Broadway
 Denver, Colorado 80216
 Telephone: (303) 297-1192



June 28, 2006

Steve Chaney,
 Great Sand Dunes National Park and Preserve Superintendent
 National Park Service
 11500 Hwy 150
 Mosca, CO 81146

Dear Steve Chaney,

Subject: Colorado Division of Wildlife Comments to the Draft General Management Plan

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

36.

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

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

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

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

DEPARTMENT OF NATURAL RESOURCES, Russell George, Executive Director
 WILDLIFE COMMISSION, Jeffrey Crawford, Chair • Tom Burke, Vice Chair • Claire O'Neal, Secretary
 Members, Robert Bray • Brad Coors • Rick Enstrom • Richard Ray • James McAnally • Ken Torres
 Ex Officio Members, Russell George and Don Arment

Response 36: This letter has been added to appendix I.

37.

The above statements refer only to the National Preserve and those National Forest lands which are accessible only through National Park lands. Overall harvest in unit 82 is significantly greater. For example in 2005, total harvest in unit 82 was estimated at 332 elk. Of those 332 harvested elk, 215 were antlerless elk and 107 were antlered elk. Of the 215 antlerless elk taken that year, 90 plus antlerless elk were taken by hunters on special management hunts that were conducted on lands that will become National Park lands in the future. Since the implementation of these special management hunts in 2002 they have contributed an average of 140 antlerless elk to the harvest in GMU 82. These harvest rates have had a significant influence to the distribution of elk in GMU 82. Continued management hunts and/or harassment directed at elk in this area along with good hunter access to the Preserve and adjacent National Forest lands must continue in order to help address the elk management issues in this area.

38.

On page 269 of the draft plan the statement:
"Providing guided hiking and equestrian trails in the guided learning zone, located within the San Luis Lakes/Sand Creek ecologically critical area, would provide beneficial impacts to rare plant communities..."

Any and all accesses and special uses not related to hunting and fishing on the San Luis Lakes State Wildlife Area (SWA) are subject to review and approval by the Division of Wildlife. Such applications will be reviewed to determine compatibility with the purposes of the SWA. Applications for Special Use Permits are available through the Monte Vista office of the Colorado Division of Wildlife.

If you have any questions regarding these comments please contact Rick Basagoitia at the Monte Vista office.

Respectfully,

Rick Basagoitia
Area Wildlife Manager – Monte Vista
Colorado Division of Wildlife

rb

cc: John Bredehoft, Asst. Director – Field Operations
Tom Spezze, SW Region Manager – Durango
Scott Wait, Senior Terrestrial Biologist – Durango
Ron Rivale, District Wildlife Manager – Alamosa North
Brad Weinmeister, Terrestrial Biologist – Monte Vista

Response 37: The Colorado Division of Wildlife Web site was used for the harvest numbers for elk in game management unit 82 in the 2005 season. According to the Web site, the total number of elk harvested was 164. The number of bulls was 107. The ongoing elk research project data suggests that the herd size is smaller than previously estimated and declining in size. It is hoped that the completion of the current research will provide a better understanding of the dynamics of this particular herd of elk. The best information available will be used in the proposed elk management plan to allow management of the herd with access to limited space. Special management hunts and harassment are management options that will be analyzed; but, by law, recreational hunting in the national park is not permitted.

Access along Liberty Road for hunting on U.S. Forest Service land and in the preserve is addressed and allowed under certain conditions. Please refer to the "Management Zones, Administrative Zone" section of the GMP.

Response 38: The National Park Service would consult with the Colorado Division of Wildlife on access and special-use issues. Language regarding consultation is included in the GMP, please refer to "Table 1, Desired Conditions and Strategies, Relations with Private and Public Organizations, Adjacent Landowners, and Governmental Agencies," and the description of the preferred alternative.

2009

SAGUACHE COUNTY GOVERNMENT

501 FOURTH STREET
SAGUACHE, COLORADO
AREA CODE 719 ZIP CODE 81149



May 16, 2006

Superintendent Steve Chaney
Great Sand Dunes National Park and Preserve
11500 Hwy 150
Mosca, CO 81146

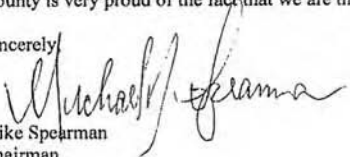
To Whom It May Concern:


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

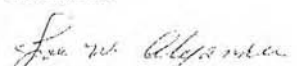
At this time we would like to let you know that the Saguache County Board of Commissioners is in unanimous support of the National Park Preferred Management Plan, which includes the addition of the New Wilderness Area.

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

Sincerely,


Mike Spearman
Chairman


Sam Pace
Commissioner


Joe Alexander
Commissioner

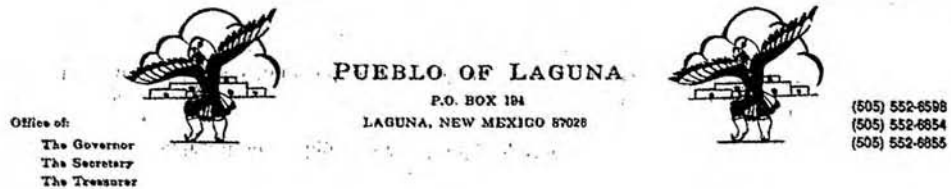
ASSESSOR
P.O. Box 38
655-2521

CLERK AND RECORDER
P.O. Box 176
655-2512

ADMINISTRATION
P.O. Box 655
655-2231

SHERIFF
P.O. Box 265
655-2544

TREASURER
P.O. Box 177
655-2656



May 1, 2006

Mr. Steve Chaney
Superintendent
Great Sand Dunes National Park and Preserve
11500 Highway 150
Mosca, CO 81146-9798

Dear Mr. Chaney:

RE: General Management Plan(GMP) and Wilderness Study

The Pueblo of Laguna appreciates your consideration of possible interest your project may have on traditional religious or cultural properties.

At this time Laguna Pueblo has determined that the proposed undertaking WILL NOT have an affect at this time, but in the event that any new archaeological sites are discovered and any items are recovered, we would like to be notified to review items.

Sincerely,

Roland E. Johnson, Governor
Pueblo of Laguna



May 30, 2006

Steve Chaney, Superintendent
National Park Service
Great Sand Dunes National Park and Preserve
11500 Highway 150
Mosca, CO 81146-9798

Re: Draft General Management Plan/Wilderness Study/ Environmental Impact Statement for
Great Sand Dunes National Park and Preserve


Dear Mr. Chaney:

Thank you for your letter of April 26th regarding the draft document as referenced above.

After review of the document, the Comanche Nation has no immediate concerns or issues regarding the draft plan; however, please keep us informed of progress. We also would like to receive any further archaeological reports and a copy of the new plan when finalized.

We look forward to your reports as planning proceed.

Sincerely,


Fred Nahwoosky, NAGPRA Coordinator

P.O. Box 908 • Lawton, Oklahoma 73502 • (580) 492-3754 • (580) 492-3733 FAX

ORGANIZATIONS

Substantive comments received from organizations are summarized below and include responses from the National Park Service.

Baca Grande Property Owners Association (POA)

Comment: *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.*

Response: Existing county roads within the subdivision currently provide pedestrian access up to the park boundary. The National Park Service proposes public vehicle access to a small trailhead/parking area for 10 to 15 vehicles in the park to provide access for hikers, backpackers, horseback riders, and hunters. Implementing a vehicular connection to the proposed backcountry access zone will require ongoing planning and collaboration with the community, Saguache County, and other agencies.

Comments: *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.

Response: The backcountry access zone permits a vehicle access road to be constructed from the park boundary and within the park. However, currently, the backcountry access zone is not accessible from the subdivision (no road connection to the park boundary exists). The National Park Service cannot construct a road or parking area in the backcountry access zone until or unless Saguache County constructs 0.2 mile of road to the park boundary on its right-of-way or develops another right-of-way to the boundary.

Comment: *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.")*

Response: The GMP has been amended to read "If no public vehicle access to the north part of the park could be found over the long term so that trailering

horses into the northern part of the park was not possible, the National Park Service would provide gates for horses at the north park boundary at Camino Real and Liberty Road and a partner would be sought to provide a horse trailhead facility outside the park.”

Comments: *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.*

Response: The GMP addresses carrying capacity and proposes cooperative efforts with land managing agencies with whom the National Park Service shares a boundary. The USFS has expressed an interest in such a cooperative effort. Until the USFS conducts its planning for the Baca Mountain Tract, the National Park Service cannot analyze impacts, which is why this action has been deferred.

Backcountry Horsemen

Comment: *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.*

Response: It is not anticipated that the area proposed for wilderness designation (the dunes and preserve are already designated wilderness) would experience high visitation. However, the GMP includes carrying capacity indicators and strategies, and calls for a wilderness management plan, to address these types of concerns. Please refer to the “Desired Conditions and Strategies” and “Management Zones” sections in chapters one and two.

Comment: *The game needs to be managed through hunting and what will in turn keep out disease.*

Response: Hunting is allowed in the preserve by the Great Sand Dunes Act of 2000; hunting is not allowed in the national park.

Front Range Backcountry Horsemen

Comment: *Please continue to consider pack and saddle stock travel as an alternative means to visit and view this unique place. It is*

a great opportunity to provide access to those who are physically unable to hike into the backcountry areas of the park and to preserve an important part of America's heritage.

Response: Horseback riding is allowed in most lands within the national park and preserve. Horseback riding would not be allowed in the dunes play zone and in the frontcountry zone, except for loading and unloading.

Trailwise Backcountry Horsemen

Comment: *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).*

Response: As part of the no-action alternative, the horse loading area would be relocated from the amphitheater parking lot to a nearby area and redesigned. Park managers will seek input from horse groups regarding the design of the new horse loading area. This action would also, therefore, be a part of any of the action alternatives.

Center for Native Ecosystems (CNE)

Comment: *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.*

Response: The existence of Cow Camp Road, an improved road, rendered most of the area to the north of the road ineligible for wilderness (please see appendix G). The revised, preferred alternative proposes to realign a portion of Cow Camp Road, which allows for a small area (257 acres) to be reclaimed and added to the proposed wilderness designation. The remaining land in the northwest is segmented by the backcountry access zone and creates isolated

parcels that are not appropriate sizes for wilderness. The remaining area is zoned as backcountry adventure, which would allow the land to remain relatively natural with minimal development.

In the southwestern portion, an additional parcel (1,705 acres) between Big and Little springs has been added to the proposed wilderness designation. The remaining remnants around Medano Ranch and including the sabkha, are not suitable for wilderness due to the Closed Basin Project, overhead powerlines, wells, and irrigation and other structures that are needed for the foreseeable future. The remaining land would be protected by the natural/wild zone.

Comment: *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.*

Response: Please see responses to The Nature Conservancy's comments.

Colorado Mountain Club

Comment: *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.

Response: Once the access route is determined, the remaining backcountry access zone would be converted to backcountry adventure zone. The existence of Cow Camp Road, an improved road, rendered most of the area to the north of the road ineligible for wilderness (please see appendix G, the preferred alternative text, and see previous Center for Native Ecosystems response above).

Comment: *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.*

Response: The preferred alternative wilderness recommendation includes an additional 1,705 acres between Big and Little Springs, northeast of Medano Ranch. The remaining remnants around Medano, are not suitable for wilderness due to the Closed Basin Project,

overhead powerlines, wells, irrigation and other structures that would need to be maintained for the foreseeable future. The remaining land would be zoned natural/wild and managed in a natural state. Please see previous CNE response.

Comment: *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.*

Response: Pole Creek is an intermittent stream and sufficient data has not been collected. The National Park Service is working with the USFS to collect data to evaluate Pole and Deadman creeks. These creeks will be evaluated when sufficient data is collected. Please refer to the “Desired Conditions and Strategies, Water Quality and Quantity.”

Comment: *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.*

Response: The final preferred alternative has been modified to further enhance protection of the Deadman Creek corridor. Please refer to the preferred alternative text and map.

Comment: *Medano Pass Road – We are concerned about possible impacts of dispersed camping along road corridor.*

Response: The National Park Service has designated a limited number of campsites along the road to confine and limit impacts. Camping is allowed in designated sites if camping is within the nonwilderness corridor and within 100 feet of Medano Creek. Parking and campfires are limited to established locations. Parking is allowed off-road only if it is not on vegetation. The park does not allow off-road travel to campsites.

Comment: *Four-wheel drive tours – The plan should more clearly state conditions for tours, and state why tours meet “necessary and appropriate” standards.*

Response: The four-wheel-drive tours that are offered provide park visitors who do not own a four-wheel-drive vehicle an opportunity to travel on the Medano Pass road (which allows vehicles). The visitor experience of driving on the sand on this primitive road has been identified as a fundamental resource and value, and therefore, meets the NPS criteria of “necessary.” This activity also meets all of the

“appropriate” criteria such as consistency with park values, services that do not compromise health or safety, that do not conflict with other uses, or that do not monopolize limited recreational experiences at the expense of the general public (see “Criteria for Commercial Services” in chapter one).

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

Response: The preferred alternative calls for transportation solutions; a shuttle system would be considered.

Comment: *...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.*

Response: The National Park Service cannot commit to a time frame due to current funding restraints.

Comment: *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.*

Response: The GMP includes parkwide goals and strategies for ecosystems and natural resources. Please refer to “Desired Conditions and Strategies, Ecosystem Management” and “Natural

Resources and Diversity” in chapter one.

Comment: *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.*

Response: Currently there is no plan for additional entrance and user fees but additional fee programs would be decided on a case by case basis according to NPS policy. Details about fees are beyond the broad management direction appropriate for a GMP.

Comment: *We recommend that the NPS 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.*

Response: The text has been modified to address this comment. Please refer to “Future Conditions and Strategies, Water” in chapter one.

Comment: *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.*

Response: Strategies in the GMP include acquiring or modifying private

property, mineral rights, and water rights within the park, where possible, to minimize impacts on park resources and values. Please refer to the “Desired Conditions and Strategies” section in chapter one.

Crestone Baca Land Trust

Comment: *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.”

Response: The National Park Service is proposing a small trailhead with a parking lot. The National Park Service does not believe this modest facility would result in heavy vehicle traffic. The preferred alternative eliminates the portion of Cow Camp Road nearest Deadman Creek to better protect this riparian corridor.

Friends of the San Luis Valley
National Wildlife Refuges

Comment: *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.

Response: Based on ongoing collaboration with the USFWS, the National Park Service has modified the preferred alternative to indicate that access through the refuge is no longer considered feasible. Please refer to preferred alternative text and map.

Foundation for North American Wild Sheep

Comment: *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.*

Response: Through an update of its Water Resource Management Plan the National Park Service would review water management issues for the expanded park. Before removing any human-made water sources, the National Park Service would, as you suggest, consider the extent to which these features are water replacements. Please refer to “Desired Conditions and Strategies, Water Quality and Quantity and Natural Biodiversity” section in chapter one.

The Nature Conservancy

Comment: *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."*

Response: There is insufficient data to support that bison were of critical importance to the park's ecosystem functionality and processes, in particular. Wherever bison occur in large numbers, that statement would be true (critical ecosystem process drivers). The question is whether bison were an ecosystem process driver in the park, or did bison impact the system only intermittently and in small numbers? The literature and explorer accounts suggest intermittent and small herds.

The Nature Conservancy herd is a domesticated livestock herd with cow genes. At present, the park has had only verbal confirmation from a third party regarding the genetic purity of the bison. This is the mitochondrial DNA analysis, which tests maternal lines. Genetic impurity results from this test

indicate 5%. To date, the park has had no confirmation regarding tests for paternal purity, which would likely increase that impurity percentage. NPS *Management Policies* support reintroduction of extirpated species in the event that the wild animal species to be reintroduced is genetically pure (inasmuch as is possible), and that the species in question indisputably inhabited that area. The park would not be able to assume the present The Nature Conservancy herd as its genetic purity is in question. The park would have to remove the present herd and replace it with animals that are appropriate to NPS policies.

The park museum has four bison records—one record is of a single phalange found in the park. Although there is a date of collection (1958), no analysis has been done to determine the age of this bone. Also, this could not be identified to species (*Bison* sp.). It could have been from a bison that died here, or it could have been transported into the park by some other means. However, no whole, partial, or multiple bones of an animal was noted at the time of collection. A second record is of a skull with an unknown provenience (it could not be connected to the park or the area surrounding the park), and so was deaccessioned from the park's collection. The third and fourth records combined are of a pair of horns found on the White Ranch. Again, only identified to genus (*Bison* sp.),

no age given, and no indication that a whole, partial, or multiple bones of an animal was located. This pair of horns may have come from an animal which died here and the horns were separated from the body, or they could have been transported into that area by some other means (people), as there were known anthropological uses for horns.

There is insufficient knowledge to determine whether adequate habitat and sufficient forage exist to support the species long-term (in perpetuity) as a free-ranging herd. From 1990–1999, each year was an above-average year for precipitation with the exception of 1991, which measured 10.19 inches for the year. Average is 11.0 inches per year. The average for each year during the 1990s was 14.25 inches per year (The Nature Conservancy assumed Medano-Zapata management in 1999). This level of precipitation undoubtedly has an effect on the availability and quality of forage. Added to that is the effect that consecutive years of above average precipitation has on the wetlands/wet meadow environments (where the bison graze), as these environments are largely defined by groundwater levels (percolation from the mountain front/alluvial fan). The park's resource management staff is aware that periods of below-average precipitation affect these meadows/wetlands, and that it is a delayed response (months or years before effects are

shown), but does not fully understand how long that effect is sustained, and what the long-term affects are to those environments. The park began monitoring stream levels during 1994–1995 (wet years), and therefore does not have solid data on long-term drought conditions. Further, any droughts experienced since 1991 (2002–2003, 2005–2006) have only been months long, not years, so it is difficult to justify knowing how to run the herd even during drought years (compare to the drought in the 1950s to 1960s, when 12 of 16 years had considerably below-average precipitation). A long-term drought (multiyear) would necessitate that park staff cull the herd or move it entirely to “mimic” the natural variation of large mammal populations and the effects of drought.

Bison management is costly and staff intensive. Natural predators are absent; therefore, the herd would have to be gathered and culled periodically. Additional staff would be required to cull the herd and to maintain miles of heavy-duty fence.

The present economic environment is not favorable for the additional funding that would be required for bison management and additional staff. Under the current situation, conditions would not meet NPS policies for a free-ranging bison herd. However, the National Park Service will

continue to consider a bison herd as conditions change, and as more information is gathered. The park's position is that The Nature Conservancy can continue to manage bison on some park lands, contributing to persistence of bison in the San Luis Valley so long as The Nature Conservancy elects to manage these herds.

The Wilderness Society

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

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

Comment: *Expansion of the wilderness recommendation.*

- *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.

- *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.*

Response: We have revised the preferred alternative to realign a portion of Cow Camp Road, allowing a small area (257 acres) to be reclaimed and added to the proposed wilderness designation. The existence of Cow Camp Road, an improved road, rendered most of the area to the north of the road ineligible for wilderness (please see appendix G).

In the southwestern portion, an additional parcel (1,705 acres) between Big and Little Springs has been added to the proposed wilderness designation. The remaining remnants around Medano and including the sabkha, are not suitable for wilderness due to the Closed Basin Project, overhead powerlines, wells, irrigation and other structures that would need to be maintained for the foreseeable future and segment the land into too small of parcels. The remaining land would be protected by the natural/wild zone.

Comment: *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.*

Response: A separate elk management plan developed in cooperation with CDOW, the USFS, and USFWS will address elk management options.

Results from the first year of the elk study indicate there are about 2,000 fewer animals than originally estimated, and that the size of the herd has declined by about 1,000 animals over the last six years.

Access along Liberty Road for hunting on USFS land and in the preserve is addressed and allowed under certain conditions. Please refer to the "Management Zones, Administrative Zone" section of chapter two.

Comment: *Backcountry access: northwest corner of park lands*

- *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.*
- *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.*

Response: The designation of Cow Camp Road or another existing primitive road as a backcountry access route has been slightly revised in the final plan to keep motorized access away from sensitive riparian areas. The GMP has been revised to clarify that once a route is selected, segments of the Cow Camp Road not needed for public access would be converted to the administrative zone. The remaining backcountry access zone not needed for public access would be converted to the backcountry adventure zone.

The National Park Service is committed to continuing to find the best solutions for implementing motorized access to the park on established roads such as Camino Real and county roads leading to Liberty gate north of the park boundary. Ongoing collaboration with the community, Saguache County, and other agencies is described in the preferred alternative – “Public Vehicle Access to Federal Lands in the North – Ongoing Collaboration.” However, it is not possible at this time to go into greater detail until this collaboration occurs.

Comment: *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.*

Response: The preferred alternative has been revised to better protect the Deadman Creek corridor. Extension of Cow Camp Road or another primitive road to Liberty Road would be a potential option in a future separate environmental analysis with public involvement. Please refer to the preferred alternative text and map.

Comment: *Keep Liberty Road closed to public vehicles and to all motorized use beyond the first 0.25 mile within the park boundary.*

Response: The GMP zones the Liberty Road for administrative use only. Opening it to public vehicle access may be considered through a future separate public joint (NPS/USFS) environmental analysis study. (Please see chapter one, "Relationship of the General Management Plan to Other Planning Efforts: Planning for Lands Added to Rio Grande National Forest in the Year 2000" for more information about USFS planning efforts.) If the results of this subsequent joint NPS/USFS environmental analysis should determine some form of public vehicle access on to federal lands via Liberty Road is the best option, the National Park Service would not need the backcountry

access zone or use of another route through the park. The parking area could be sited on USFS land.

Comment: *Keep parking area out of sensitive lands in the northwest corner of park.*

Response: The final preferred alternative has been modified so that a route through the north portion of the park ends 0.5 mile or more from Deadman Creek. The exact location of the parking area at the end of the road would be analyzed under a separate environmental analysis with public involvement. Please refer to the preferred alternative text and map.

Comment: *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.

Response: Administrative roads are necessary to maintain the Closed Basin Project infrastructure, overhead utility lines, irrigation structures, and wells. These activities are not only performed by the National Park Service. They are primarily preformed by other entities that have authorized access.

Comment: *Excluding the main administrative vehicle access road to Medano Ranch, we recommend that the Park Service zone all routes in this area as Natural /Wild or Backcountry Adventure instead of administrative.*

Response: Please see response above.

Comment: *Reduce backcountry access zone in the northwest corner of the park when the specific locations of access roads and parking have been determined.*

Response: The National Park Service has revised the preferred alternative to indicate that once an access route is determined, the remaining backcountry access zone would be converted to backcountry adventure zone. The existence of Cow Camp Road, an improved road,

rendered most of the area to the north of the road ineligible for wilderness (please see appendix G and the preferred alternative text).

Comment: *Motorized/Mechanized Vehicles.*

- *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 do not degrade the natural values of Medano Creek or compromise visitor’s experiences of quiet in the park.*

Response: The National Park Service intends to continue working with the USFS and other agencies and neighbors to achieve future desired conditions for resources within the park. Please refer to “Desired Conditions and Strategies” in chapter one and “Carrying Capacity Measures” for the backcountry access zone in chapter two.

Comment: *We urge the Park Service to actively and fairly pursue ownership for all wilderness-quality lands within park boundaries.*

Response: Strategies in the GMP include acquiring or modifying private property, mineral rights, and water rights within the park, where possible, to minimize impacts on park resources and values. Please refer to the

“Desired Conditions and Strategies” section in chapter one. Through a separate planning process, the National Park Service, BLM, USFWS, and Colorado State Land Board are collaborating on a land exchange (please see “Relationships of the GMP to Other Planning Efforts” in chapter one).

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.

Response: The GMP preferred alternative does not propose changes to camping facilities. The GMP does include strategies for park managers to consider the availability of existing or planned facilities in nearby communities and adjacent lands, as well as the possibility of joint facilities with other agencies. Please refer to “Desired Conditions and Strategies, Facilities, and Services” section in chapter one.

Upper Arkansas and South Platte Project

Comment: *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...*

Comment: *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.*

Response: The National Park Service intends to continue working with the USFS and other agencies and neighbors to achieve future desired conditions for park resources. This level of detailed planning is beyond the scope of the GMP. However, the park would update its water resources management plan to address park expansion lands. Please refer to “Desired Conditions and Strategies, Water Quality, and Quantity” section in chapter one.

Response: Please see response to Center for Native Ecosystems comment above.

Comment: *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,*

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

Response: These are goals for the park. Please see the “Desired Conditions and Strategies” section in chapter one.

INDIVIDUALS

Substantive comments received from individuals are summarized below with the NPS response following. Comments are summarized and combined to reduce redundancy.

Access

Comment: *The Park Service has chosen to ignore the key issue of access in the north part of the park by deferring analysis to another agency or future analysis. Ignoring a key issue is a violation of the National Environmental Policy Act (NEPA), which requires identification of key issues. NEPA also requires that key issues drive alternative development and analysis. Astoundingly, the Park ignores this and gives it minor focus, when this issue could be one of the most significant of all that you need to address in the Park plan.*

Response: The National Park Service has determined that it is desirable to have a small backcountry trailhead parking area for 10 to 15 vehicles to provide access for hikers, backpackers, horseback riders, and hunters near the foot of the mountains but away from sensitive riparian environ-

ments. The NPS preferred alternative in this GMP proposes to develop such access via the backcountry access zone shown on the map, which includes the use of an existing primitive road. However, implementing a vehicular connection to that zone depends upon ongoing planning and collaboration with the community, Saguache County, and other agencies.

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

Response: Under the preferred alternative, Liberty Road is available year-round for pedestrians. Hunter access is provided in consultation with CDOW.

Please refer to the “Management Zone, Administrative Zones” section of chapter two.

Comment: *The proposed public access to Alpine Camp via the Baca NWR is untenable. Public access off the Cow Camp Road may involve new road construction, which will heighten environmental effects and essentially remove it from reasonable alternatives. You need to focus on the most reasonable alternative, the Liberty Road, and move forward with an array of acceptable vehicle access options.*

Response: The preferred alternative in the final GMP has been modified. The area abutting the refuge has been changed to back-country adventure zone, and thus, no longer allows public vehicle access from the refuge. Please refer to map and description of the preferred alternative. In consultation with the USFS, more information about the Liberty Road and future planning has been added to chapter one “Planning Considerations and Constraints,” and chapter two “NPS Preferred Alternative, Public Vehicle Access to Federal Lands in the North – Ongoing Collaboration.”

Comment: *You have selectively decided not to adequately address the access issue in your draft plan. If this is not rewritten to address this issue my traditional hunt in this area will be forever changed. I fear the*

traditions, stories, and historic hunting experience that have been enjoyed though this access will not be able to be shared with my three upcoming hunting sons.

Response: There is no place in the park where public hunting was previously allowed that is precluded now.

Comment: *The public should have unrestricted access through the park on the Liberty Road. This should be part of all of your alternatives. Blocking public vehicle access across 0.7 of a mile of NPS jurisdiction from a county road should never be allowed to happen. It is inappropriate for the park to manage USFS activities and mission by blocking access.*

Response: Liberty Road is currently available for administrative use by the USFS (and other agencies), and would remain available under the preferred alternative. The National Park Service cannot open the road to unrestricted access without analyzing the environmental consequences of doing so. Until the USFS develops specific alternatives for management of the Baca Mountain Tract there is insufficient information upon which to determine the environmental consequences.

Comment: *Let the backcountry hikers access the northern area of the Sand Dunes Park and the adjacent Forest Service land through the development of*

existing roads in the Great Sand Dunes National Park. Use maps included in the plan do not show existing Sand Dunes road access to the north park area, and the Baca Wildlife Refuge will not be granting access as this would conflict with their federal mandate. If the Sand Dunes and the Forest Service want access for the public then they should use their own roads.

Response: There are a number of two-tracks, Cow Camp Road, and Liberty Road, on the former Baca Ranch lands that have been added to the park. The only way for any of them to be utilized by the public for vehicle access to new public lands in the north is via the Baca Grande subdivision because public vehicle access through the Baca National Wildlife Refuge is not an option. The preferred alternative has been modified to no longer show backcountry access as possible from the refuge. An additional option has been added along an existing two-track. The intent of the preferred alternative backcountry access zone is to utilize an existing road or two-track, any of which connect to the subdivision. The implementation of one of these routes depends upon ongoing collaboration.

Comment: *I am against changing the back country parking area to San Luis Lakes State Park because it will increase my horse riding and hiking time to approxi-*

mately 25 miles, across the sand without water along the route, just to reach the national preserve or national forest.

Response: The preferred alternative does not propose “moving” the horse loading and unloading area from the frontcountry zone to the San Luis State Park for access to the park and forest, but instead proposes a possible cooperative opportunity with the state park for an additional access point for enjoying other areas of the park.

Comment: *NPS park rangers drive the Liberty Road on regular basis and no one but the National Park Service has jurisdiction over the first 0.7 mile on that road. It is very feasible to use the Liberty Road as the access point to the back country without building a new road. This is solely under the control and jurisdiction of the National Park Service. This plan must be rewritten to address Liberty Road as a northern access to the back country zone and the National Forest.*

Response: Liberty Road is currently available for administrative use by the USFS (and other agencies), and would remain available for such use under the preferred alternative. The plan has been modified in consultation with the USFS to provide more information about Liberty Road and future planning. Please see chapter one, “Planning Considerations and Constraints,” and chapter

two, “NPS Preferred Alternative, “Public Vehicle Access to Federal Lands in the North – Ongoing Collaboration.”

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

Response: The purpose and need statements to which you refer have been revised in consultation with the USFS. Access to USFS land and a future planning process has already been addressed.

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

Response: As stated above, the Baca Grande community, Saguache County, and the USFS are engaged in a related planning process. The USFS is likely to develop access and management options for the Baca Mountain Tract, and these options will be analyzed in a separate environmental study, with input from the public, neighboring communities, and the National Park Service.

Comment: *I am amazed that the National Park Service is making believe*

that there is no visitor use on the Liberty Road, The Liberty Road is used every day by many people. The Liberty Road is obviously used to access the back country and the National Forest. The seven tenths of a mile section of road should be indicated on the map as a "back country access" location, not just National Forest and not the National Park.

Response: The existing character and use of Liberty Road has been described in more detail in the final plan. Under the preferred alternative, Liberty Road would be zoned administrative. The administrative zone permits visitor hiking or horseback travel in addition to administrative use by the agencies. Please refer to the "Management Zones, Administrative Zone" section in chapter two.

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

Response: Under the preferred alternative, if no public vehicle access to the north part of the park could be found over the long term so that trailering horses into the north part of the park was not possible, the National Park Service would provide gates for horses at the north

park boundary at Camino Real and Liberty Road, and a partner would be sought to provide a horse trailhead facility outside the park. The National Park Service cannot open the road to unrestricted access without analyzing the environmental consequences of doing so. Until the USFS develops specific alternatives for management of the Baca Mountain Tract there is insufficient information upon which to determine the environmental consequences.

Comment: *I would like to see a shared responsibility for access to the park between the U.S. Fish and Wildlife Service and the Baca Grande subdivision. The subdivision would be the public access from January through mid-August, and the U.S. Fish and Wildlife Service would provide access during the critical hunting season portion of the year, which is the least compatible use with the subdivision.*

Response: Based on consultations with the USFWS, the preferred alternative in the final GMP has been revised to indicate that access from the refuge is not a feasible option for public vehicle access into the park. Please refer to the map and description of the preferred alternative.

Comment: *It is my belief and hope that the National Park Service, the USFWS, and the USFS will be able work together to provide an access to the northern Baca area through an entry, jointly*

funded, constructed, and staffed, located just south of the mi. 100 marker on CO 17. Possibly the CO Dept. of Wildlife could be a participating entity in this endeavor.

Response: This option was considered and dismissed early in the planning process due to (1) the high costs to construct and maintain such a road, and (2) the fact that such a road would cross the major wetlands system that runs in a north-south direction through the refuge. Based on ongoing discussion and consultation with the USFWS, vehicle access to the park and forest across the refuge is no longer a viable option. Please refer to the USFWS letters in the previous section.

Wildlife/Hunting

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

Response: For this data, the harvest numbers for elk in game management unit 82 in the 2005 season were taken from the CDOW Web site. The total

number of elk harvested was 164, and 107 of those were bull elk.

An elk management plan developed in cooperation with CDOW, the USFS, and USFWS will address elk management options, including hunting. Results from the first year of the elk study indicate there are about 2,000 fewer animals than originally estimated, and that the size of the herd has declined by about 1,000 animals over the last six years.

Study results also indicate that this elk herd's calf recruitment rate, which is the number of calves that survive to six months old and are "recruited" into the herd, has been declining since about 1990. At this time, the reasons for the decline and whether the decline will continue into the future are unknown. However, the findings indicate that the low recruitment rate is not related to "density effect," or over population of elk.

Comment: *There are so many elk that they are damaging the vegetative resources, especially the willows, in some of the drainages in the new Rio Grande NF tract. It's the same situation that Rocky Mountain NP is now facing. The Colorado DOW has been trying to address the problem through new hunting seasons and game management units. When hunting season arrives, the elk will move into the park and into the new National Forest*

tract. Since access along the Liberty road is restricted, most of the hunters going into that area will be on foot. The result will be that fewer elk will be harvested, thus having very little effect on the population. If the numbers of elk are not controlled, the elk will not only destroy the vegetation on the Forest tract, but will damage the resources on the park.

Response: Results from the first year of the elk study indicate that the elk population does concentrate within Great Sand Dunes National Park, Baca National Wildlife Refuge, and the lands administered by The Nature Conservancy in the fall and winter. However, the results also indicate that the elk population is significantly smaller than originally estimated (please see response above), and that the herd is at a level well below “carrying capacity,” or the number of animals the area’s habitat can support.

The next two years of the study will focus on assessing the impacts of elk grazing on grasses, shrubs, and trees within the national park, national wildlife refuge, national forest, and The Nature Conservancy lands. Efforts will also be aimed at refining estimates of ecological carrying capacity and assessing the health of the herd.

Comment: *As for the extremely large elk population, it is not addressed in the preferred alternative or*

any of the alternatives. The elk issue is not addressed in the purpose and need section of the GMP, therefore you do not have an adequate range of alternatives to address the overpopulation of elk. This document must be rewritten to address the overpopulation of elk and it’s affect on the National Park and adjacent lands.

Response: Please see responses immediately above.

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

Response: Please see response above.

Comment: *It would not be unreasonable for the park to make this new section of land a National Preserve Wilderness instead of a National Park Wilderness and provide means to manage wildlife. National Preserves allow hunting as a management tool where National Parks do not. None of the alternatives in the draft GMP/Wilderness Study/EIS for the Great Sand*

Dunes Park and Preserve address this issue through a National Preserve alternative.

Response: A basic premise of the NPS general management planning process is to work within the sideboards of existing law and policy. Congress created the new Great Sand Dunes National Park and Preserve in 2000, and clearly had the intent of expanding Great Sand Dunes National Monument to a National Park, and designating the watershed above as a National Preserve to allow continued hunting on those lands.

Comment: *By limiting motorized access the National Forest's ability to provide multiple use activities is reduced. Many kinds of recreation normally permitted on Forest lands and the ability to work with CDOW to manage the summering elk herd on Forest lands are also reduced. Limiting motorized access also affects the bighorn sheep herd health and population.*

Response: The preferred alternative allows hunters who are accompanied by agency personnel to access the national forest. Please refer to "Management Zones, Administrative Zone" and the NPS "Preferred Alternative" map.

Analysis Improvements/Corrections

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

Response: The Great Sand Dunes draft EIS used two classifications: a broader and more generally intuitive "life zone" and the "ecological systems" that comprise each life zone. The ecological systems approach used in the draft EIS is a direct implementation of the ecological systems hierarchical classification developed by Nature-Serve and as such is a well documented and appropriate way to describe habitat and land cover. Ecological systems are similar to the U.S. National Vegetation Classification (NVC) in that extant vegetation is an important component, but

they also incorporate habitat and landform attributes (including soils), creating an integrated approach to delineating landscapes. They range in scale, but typically fall between NVC formation and alliance levels. They are well described and currently mapped at a coarse scale by Southwest Regional Gap Analysis Project (REGAP; <http://fws-nmcfwru.nmsu.edu/swregap/ut>), Nature-Serve and the Colorado Natural Heritage Program for the Southern Rockies Ecoregion. Moreover, ecological systems are being used in the ongoing NPS-USGS Vegetation Mapping project. They are either map units in and of themselves or may be cross-walked from other forms of map units (usually U.S. NVC alliances or associations). The USFS (Rio Grande National Forest) is an active partner in this project and has endorsed the classification system being used. When this project is complete (2007 or 2008), ecological systems will be mapped at a scale of 1:12,000 to 1:20,000 with a high degree of accuracy in an area of about 413,000 acres, including all of the park. Therefore, with the vegetation mapping product on the horizon, along with the integrated approach that ecological systems embody, using ecological systems in the draft EIS (even though they are coarse at this point) is a refined and appropriate approach.

Comment: *The soil surveys that apply to your area are the best*

“ecological units” available and can easily be quantified. In addition to soil types, potential vegetation is described as well as landforms, geology and climate. The three applicable surveys include Alamosa County, Saguache County, and the Sangre de Cristo Soil and ecological Resource Inventory, 2006.

Response: Sources noted. CEQ regulations (40 CFR 1500.1 (b)) state, “Most important NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.” The GMP is not intended to be an exhaustive description of the park and preserve. Many management objectives in the preferred alternative are more directly connected to extant vegetation and habitat than soils or surficial geology. Future projects included in the preferred alternative that involve ground disturbance would be subject to subsequent environmental analysis and impacts to affected soils would be addressed therein.

Comment: *Soils data for the entire Preserve portion is lacking in the analysis.*

Response: Please see response above. The preferred alternative proposes very few actions having the potential to impact soils in the preserve. Construction of new trails would be subject to a subsequent environmental analysis and impacts to affected

- soils would be addressed therein.
- Comment: *On page 71 1st paragraph, (2) states that “off-highway vehicle use west of Medano Pass was formerly allowed, before the area became part of the National Preserve.” This statement is not true.*
- Response: The use of vehicles off highway was not permitted but the use of off highway vehicles was permitted.
- Comment: *Regarding Yellow-billed Cuckoo, the table reports “Not found in or near Park”. In 1984, there was a report of a Yellow-billed Cuckoo at the Sand Dunes. Also, I don’t know if these observations qualify as “near the Dunes” but, a bird survey crew reported an audible call that was heard in 06-2003 at McIntyre-Simpson property, east of La Jara. Subsequently, two birds were seen at that location.*
- Response: The text for the yellow-billed cuckoo has been completely revised, to indicate that a yellow-billed cuckoo was reported at Great Sand Dunes in 1984. However, no subsequent records in the park are known.
- Comment: *DEIS Page 113 describes the aggregated Pinyon and Juniper to Montane Zone as 8,000 to 9,500 feet. The Sangre de Cristo Soil and Ecological Inventory shows the Montane Zone*
- (dominated by Douglas fir, ponderosa, white fir and aspen communities), occurs normally to about 10,400 elevation. The Subalpine zone, dominated by Engelmann Spruce occurs from 10,400 to 11,400. The alpine zone occurs from 11,400 to the highest peaks of the Sangre Mountain range. The DEIS needs to reexamine these zone descriptions and make necessary changes.*
- Response: The zone descriptions to which you refer have been reexamined and verified by park natural resources staff.
- Comment: *DEIS page 113. The bird names need to be consistent with the American Ornithological Union nomenclature and should be singular. As such, Western Tanager, Chipping Sparrow, Northern Goshawk. ...should be listed under each lifezone. etc.*
- Response: These changes have been made.
- Comment: *DEIS page 114 first paragraph, should read White-tailed Ptarmigan.*
- Response: This change has been made.
- Comment: *The Great Sand Dunes Advisory Council is not the same as the “Advisory Council on Historic Preservation,” an entirely different entity. The index should reflect this.*
- Response: For clarification, the document has been revised to refer to the

Great Sand Dunes Advisory Council as the “Advisory Council,” and the Advisory Council on Historic Preservation as the ACHP.

Comment: *“The Nature Conservancy” should not be indexed under “T.” It should be under “N.”*

Response: The Nature Conservancy is now indexed under “N.”

Facilities

Comment: *The day-use parking situation at the Sand Ramp Trail will only become worse if a solution is not achieved. I hope you develop an appropriate solution (maybe you could have 2 spaces for backcountry and 2 spaces for day use... and sign them appropriately).*

Response: This is too detailed an issue for GMP-level planning. The park staff has noted this concern.

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

Response: The land between the end of Camino Real and the northern boundary of the park is a Saguache County right-of-way. While it allows for public

pedestrian access to the park, the National Park Service does not have jurisdiction over land outside of the park boundary. Providing parking at that location would require action by the county and the subdivision.

Comment: *Please put the visitor’s center out past the Baca Ranch access so people know the right way to go to get to the park.*

Response: The preferred alternative does not propose a new visitor center, but does state that a joint visitor contact station with the USFWS and National Park Service (e.g., on the refuge at the former Baca Ranch headquarters or along SH 17) could be a potential cooperative opportunity.

Comment: *Put the visitor center on State Highway 17, not on County Road T.*

Response: Please see response above.

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

*Medano Ranch hdqtrs.) to the
Guided Learning area.*

Response: A campground in the north-west is proposed as part of the three public nodes alternative, but was not included in the preferred alternative based on the probable environmental impacts. The three public nodes alternative also analyzes the impacts of converting Medano Ranch headquarters to a public day use area (front-country zone). Due to staff and funding constraints and potential impacts, this was not included in the preferred alternative. A campground would not be compatible with the proposed zoning for Medano Ranch.

Medano Ranch

Comment: *The Medano Ranch might best serve as a learning center. Rather than attempting to restore this long-used ranch to some semblance of 'natural, it might be best utilized as a node where visitors could learn about the riches of the Park and Preserve.*

Response: The preferred alternative allows for limited (scheduled) public access for the purposes you propose.

Nonnative Species Management

Comment: *One indicator listed to limit the number of people accessing this area was noxious weeds especially in and around Deadman Creek. Noxious weeds already exist along Deadman Creek. It is important to know what the current noxious weed condition is on the new section of the National Park in order to use this as an indicator. It is also most likely that Elk are and will be the transporters of noxious weed seed not people. Until the elk population is reduced to a reasonable number this should not be an indicator of limiting access to people. This plan must be re-written to show a current noxious weed map and to address the concern listed.*

Response: A noxious weed management plan will address management of nonnative invasive species in more detail. Please refer to the "Desired Conditions and Strategies, Natural Resources and Diversity" section of the GMP.

Comment: *The weeds imported by horses and trailers will not "Preserve the remarkable biodiversity evident in the landscape from the valley floor to the mountain crest" (p.9, Sand Dunes Park Purpose.) Noxious weed control is an impossible feat and destroys fragile eco-systems. If they allow horses the manure must be collected and removed and cars must drive through an herbicide to*

enter the park. This could limit the poisoning of our fragile land to a few select areas rather than have an inadequate weed control program "wherever the invasive species are found."

Response: Please see response above.

Reintroduction

Comment: *Release the Bison to roam the park along with the release of wolves.*

Response: Please see response to The Nature Conservancy comments and response below.

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

Response: An elk management plan developed in cooperation with CDOW, the USFS, and USFWS will consider elk management options including hunting and introduction of natural predators.

Shuttle

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

Response: The preferred alternative does include provisions for a shuttle.

Wilderness

Comment: *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. Please also propose wilderness protection for wilderness-quality lands surrounding Medano Ranch. The sabkha, a fundamental park resource, is under-represented 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.*

Response: The revised preferred alternative proposes to realign a portion of Cow Camp Road, which permits a small area (257 acres) to be reclaimed and added to the proposed wilderness designation. The existence of Cow Camp Road, an improved road, rendered most

of the area to the north of the road ineligible for wilderness (please see appendix G and the preferred alternative text).

In the southwestern portion, an additional parcel (1,705 acres) between Big and Little Springs has been added to the proposed wilderness designation. The remaining remnants around Medano and including

the sabkha, are not suitable for wilderness due to the Closed Basin Project, overhead power-lines, wells, irrigation and other structures that would need to be maintained for the foreseeable future and would segment the land into too small of parcels. The remaining land would be protected by the natural/wild zone.

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Natural Resources Conservation Service
(NRCS)

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