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Parks and Wildlife
Department of Natural Resources

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September 20, 2016

Ms. Cam Hooley
Columbine Ranger District
San Juan National Forest
P.O. Box 439
Bayfield, CO 81122

Re: Initial Draft Hermosa Creek Watershed Management Plan

Dear Ms. Hooley:

Colorado Parks and Wildlife (CPW) has reviewed the Initial Draft Hermosa Creek Watershed Management Plan (Hermosa Plan). The newly created Hermosa Creek Wilderness and the Hermosa Special Management Area (SMA) are a result of a collaborative effort from a diverse group of local stakeholders that desired to achieve legislative protection of the watershed. The legislation that created the Hermosa Creek Watershed Protection states:

> "The purpose of the Special Management Area is to conserve and protect for the benefit of present and future generations the watershed, geological, scientific, recreational, wildlife, riparian, historical, educational, and scenic resources of the Special Management Area."

The Hermosa Plan is an amendment to the 2013 San Juan National Forest (SJNF) Land and Resource Management Plan (Forest Plan), and the Recreational and Travel Management analysis and decision will be an integral part of the plan.

The Hermosa Plan area is approximately 107,900 acres of National Forest land and includes both the SMA and Hermosa Creek Wilderness located in La Plata and San Juan Counties. It is a popular destination for many types of motorized and non-motorized recreation including: Off Highway Vehicle (OHV) riding, motorbiking, mountain biking, hiking, horseback riding, fishing, hunting, and camping. The intention of the Hermosa Plan is to balance these uses in support of the stated purpose of the legislation. CPW applauds the efforts of the local community to come together and work cooperatively to conserve and protect a unique and valuable resource.

Bob D. Broscheid, Director, Colorado Parks and Wildlife • Parks and Wildlife Commission: Robert W. Bray • Chris Castilian, Chair • Jeanne Horne, Vice-Chair
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Social and Economic Benefits of Wildlife

The Hermosa Creek Watershed is an important and popular area for wildlife based recreation. La Plata and San Juan Counties received combined economic benefits of approximately $47.3 million from hunting and fishing recreational activities that support an estimated 516 jobs (BBC Research & Consulting, 2008). In San Juan County, hunting and fishing related jobs are estimated to account for approximately 6.7% of total jobs in the county. The substantial economic benefits from hunting and fishing recreation are sustainable if wildlife populations, particularly big game populations, are maintained and high quality hunting opportunities continue to exist. CPW's recommendations below are intended to help maintain healthy wildlife populations, protect the habitats wildlife depend on, and preserve hunting and fishing opportunities and the benefits they provide.

Terrestrial Wildlife Habitat and Use

The Hermosa Creek Watershed is a large and diverse landscape with many habitat types, including riparian, wetlands, mountain grasslands and shrublands, aspen, ponderosa pine, spruce-fir, cool moist mixed conifer, and warm dry mixed conifer stands. Influenced by aspect and elevation, these diverse habitat types are well distributed across the watershed and support a broad diversity of terrestrial wildlife species including, but not limited to: mule deer, elk, black bear, mountain lion, bobcat, coyote, beaver, reptiles and Abert's squirrel. Mule deer, elk and black bear use this area extensively in the summer and fall. CPW has mapped portions of the SMA as elk winter concentration area, production areas, and as mule deer winter range. Moose have increasingly been observed in the SMA in recent years.

Winter habitats and migratory corridors are known to be a limiting factor on big game populations in western Colorado and other high mountain areas of the western United States (Sawyer et al. 2009, Bishop et al. 2009, Bartman et al. 1992). There are several migration corridors for elk and mule deer generally running north-south through the Hermosa Creek drainage, along the eastern boundary of the SMA above the Hermosa Cliffs, and down larger drainages like Goulding Creek and Elbert Creek to the Highway 550 corridor. These corridors allow seasonal migrations between high elevation summer range and lower elevation winter range. Severe elk winter range for the Hermosa elk herd is generally in the Animas Valley to the east of the SMA, at the southern end of the Hermosa Watershed, on nearby Bureau of Land Management (BLM) land and Perins Peak State Wildlife Area to the south and west. Mid elevations (approximately 7,800 - 9,200 ft) within the Hermosa Creek drainage serve as a transition zone in early spring and late fall for mule deer and elk as they move between winter and summer range.

Aquatic Species and Habitat

Hermosa Creek and the East Fork of Hermosa Creek support an abundance of aquatic life, including a recently reestablished native Colorado River Cutthroat Trout population in the East Fork and upper reaches of Hermosa Creek, native mottled sculpin, and non native species including rainbow, brook trout, and cutbows. CPW greatly appreciates the partnership with the Columbine Ranger District and their continued support of the Colorado River Cutthroat restoration efforts on the East Fork and main Hermosa Creeks. CPW supports the installation of a fish passage structure on FS 578 where it crosses Hermosa Creek. We also

support the removal of the ford crossing through the East Fork of the Hermosa Creek at the Upper Hermosa Creek trailhead area. Structures that allow fish passage and eliminate repeated vehicle crossings will continue to benefit our joint cutthroat restoration efforts. Permanent signage explaining the restoration efforts as described in the Hermosa Plan would help educate the public on this unique project.

Avian Species and Habitat

The Hermosa Creek Watershed provides habitat for Dusky grouse, Merriam's turkey, migratory birds and raptors. Turkeys are found in abundance in the southern end of the SMA in ponderosa pine habitat during the spring and at all elevations during the summer and fall. A turkey production area is mapped in the southern end of the SMA. Dusky grouse can be found throughout the Hermosa Creek wilderness and SMA.

The SMA is suitable for raptor nesting for a variety of species. The eastern boundary of the SMA supports peregrine falcon nest sites on the Hermosa Cliffs. These nest sites have not been surveyed since 2007 and their nest status is unknown at this time. Peregrine falcons are sensitive to human encroachment and activity and can abandon nest sites during courtship and rearing as a result. CPW's raptor guidelines and the Forest Plan Standard 2.3.35/Table 2.3.2 recommend and prescribe no human encroachment (NHE) from March 15 through July 31 within one half mile of active nests. Due to propensity of peregrine falcons to relocate nest sites within the same geologic feature, our guidelines recommend designating nesting areas that encompass the cliff system and a half mile buffer around a cliff complex for NHE.

Travel Management

The construction of new trails and the adoption of trail use restrictions in the SMA should be carefully planned. Numerous studies (Knight and Gutzwiller 1995, Garber and Burger 1995, Taylor and Knight 2003, Cassirer et al 1992, Miller[2] et al 2001) show non motorized recreation (hiking and biking) and mechanized and motorized recreation (mountain bikes, motorbikes, and OHV's) can alter species composition and behavior, lead to avoidance of otherwise suitable habitat, and decrease abundance and activity levels of wildlife. Disturbance of big game in the winter and early spring can lead to poor body condition, shift distribution to suboptimal habitat types, can effect over winter survival of adults and/or result in decreased neo-natal survival rates (Ciuti et al. 2012).

CPW strongly supports the requirement in the Hermosa Plan that all motorized and mechanized travel be limited to system trails only. User created trails and the illegal use of historic logging roads causes an increase in overall trail and route densities, reduced habitat effectiveness and increased habitat fragmentation for wildlife. Robust and sustained education and enforcement will be necessary to inform recreationalists of the consequences of illegal route construction and use.

Trail Density Guideline

The north end of the SMA and the ski area has a high density of existing trails and roads. CPW is concerned that the inclusion of additional miles of trails will continue to further fragment and diminish the habitat effectiveness of this area. Therefore, CPW strongly supports the Hermosa Plan guideline that all new trail miles result in a reduction of existing trail miles at a 2:1 ratio. This guideline applies to the SMA and includes trails within the ski area boundary and just outside of it.

Seasonal Closures

Seasonal closures can be an effective management tool to allow for quiet and undisturbed use of habitat by wildlife during critical time periods. The Hermosa Plan currently recommends seasonal closure dates of January 1 through April 30 for motorized use on the lower stretch of Hermosa Trail, Jones Creek Trail, Dutch Creek Trail, Pinkerton Trail, Upper Dutch/Pinkerton Trail, and December 1 through April 30 for the upper Hermosa and Corral Draw trails. The majority of these trails occur within winter concentration area, migration corridor, and production areas for elk. CPW recommends modifying the seasonal closure dates to December 1 through April 30 for all the above trails to adequately reflect the winter seasonal restrictions necessary to protect wintering elk. In addition these dates are consistent with existing seasonal closures on nearby recreational lands which would help to avoid confusing trail based recreationalists and are Guidelines (2.3.60) in the Forest Plan.

Historically, mechanized trail use on the identified trails was largely self limiting given early winter snow accumulations and the subsequent muddy trail conditions in the spring. However, the advancement of bike technology including fat tire bikes with higher flotation over snow and muddy trails, the increase in e-bike use, and the increasing popularity of mechanized use in the last 25 years provides the opportunity for mechanized users to increase the season, distance and frequency of recreational use within the Hermosa Watershed. Mechanized users travel faster, cover more ground, and have the opportunity to have greater effect than hikers on wildlife (Taylor & Knight, 2003). Elk were found to have a greater flight response from motorized and mechanized users than that for hikers and horseback riding (Wisdom et al. 2005). CPW recommends extending the closure to include mechanized travel on these trails to minimize impacts to wintering big game.

Trail User/Hunter Conflict in Upper Dutch/Pinkerton, Little Elk, and Big Lick

Most of the outfitter activity in the eastern SMA occurs in the area bisected by the Upper Dutch/Pinkerton trail. This area and the Little Elk drainage support several outfitters and it receives both guided client and public hunter use. CPW has received information that conflicts between hunters and trail based recreationalists is increasing on the Upper Dutch/Pinkerton trail. CPW recommends that this trail remain designated for non motorized use only. In addition we recommend limiting mechanized use of Upper Dutch/Pinkerton and Little Elk trails during the period of September 1-November 30 to reduce conflicts with hunters and outfitters. This restriction will provide an area of quiet enjoyment for hunters. In addition, CPW supports the recommendation that the Big Lick Trail be restricted to non

mechanized use only. The trail is in the heart of this heavily hunted area of the SMA and in a mapped elk production area.

Livestock Grazing and Range Management

The riparian areas in the East Fork of the Hermosa and main stem of Hermosa Creek just above the confluence are listed as 'Robust' stream health in the Hermosa Plan. There is potential for streambank degradation associated with livestock grazing. CPW recommends monitoring of riparian areas and the use of temporary fence and other exclusion practices as necessary to protect the streambank.

The Elbert Creek/Hermosa Park cattle allotment had been vacant for several years prior to 2016. CPW appreciates the Columbine Ranger District keeping the stocking level of the Elbert Creek/Hermosa Park cattle allotment at reduced levels since this will help to maintain adequate forage for wild ungulates. We would also suggest that as fencing is repaired or replaced on the SMA that wildlife friendly fencing practices, such as lay-down fences, be used where practical to allow for elk and deer movement along migration corridors.

While range quality is good in many locations, there are areas of weed infestation, particularly in the Hermosa Park area. Because invasive weeds can decrease habitat quality, CPW recommends an aggressive weed control program, especially along roadways, trails, and cattle allotments. The importance of managing invasive species is recognized in the Forest Plan Desired Conditions 2.8.2, 2.8.3, and 2.8.5.

Dispersed Camping and Facilities

Many of the dispersed campsites within the SMA are causing resource damage. CPW supports the hardening of access routes to existing dispersed camping areas along FS 578 and that the 300' rule be removed to reduce resource damage. CPW suggests closing of dispersed camping sites along FS 578 south of the Hermosa Creek ford to the cattle guard northwest of the Upper Hermosa trail head. Many of these campsites are immediately adjacent to the stream's edge and heavy use is causing stream bank erosion, increasing sediment loading in Hermosa Creek. There is also a concern for nutrient loading in Hermosa Creek from human waste as the topography does not allow for adequate separation from the stream.

CPW supports the removal and relocation of facilities from the south side of the EF Hermosa Creek and the addition of a <50" bridge over the EF Hermosa Creek. More closely regulated management of dispersed camping in Hermosa Park could help to reduce resource damage and crowding issues at the Upper Hermosa TH Meadow. We would also suggest that you consider the installation of additional toilet facilities in the area, potentially located near the Upper Hermosa TH and at the proposed OHV unloading area at FS 578 & FS 579. Given the current levels of use in the Hermosa Park area, these facilities could be crucial in protecting habitat and water quality.

Conclusion

Thank you for the opportunity to comment. CPW generally supports the effort/goal of the Hermosa Plan to strike a balance of resource protection, historic uses and recreational opportunities. We encourage the Forest Service to consider our recommendations, as we think that they would help to minimize impacts to wildlife within this valuable landscape. CPW looks forward to working with the Forest Service throughout the planning process to ensure that the wildlife values of the Hermosa Plan Area are maintained. If any additional information is needed, please contact District Wildlife Manager Steve McClung at 970.375.6756.

Sincerely,

FOR MATT THORPE

Matt Thorpe
Area Wildlife Manager-Durango
Xc: Dorsey, Holst, Magee, Wait, SWR, Thorpe, McClung, Weinmeister, A15 File

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