

Colorado Parks and Wildlife Commission Resolution - 17-02

Support for Transfer of the Medano Ranch to Great Sand Dunes National Preserve

WHEREAS, Public Law 106-530 authorized the Secretary of the Interior to establish Great Sand Dunes National Park and Preserve upon being signed into law on November 22, 2000, and

WHEREAS, the legislation authorized the Department of the Interior's future acquisition of additional privately-held lands, including the 12,518 acre Medano Ranch, located between Great Sand Dunes National Park and the Baca National Wildlife Refuge, and

WHEREAS, since the establishment of Great Sand Dunes National Park elk have sought refuge and established themselves on areas within the National Park, and on adjacent private lands including the Medano Ranch, resulting in resource damage to the landscape and negative impacts to other wildlife, and

WHEREAS, resource damage caused by overpopulated ungulate species in the San Luis Valley threatens not only the Great Sand Dunes ecosystem, but also represents a significant liability for the State of Colorado in the form of potential game damage claims that CPW biologists have estimated could total millions of dollars, and

WHEREAS, the Medano Ranch is adjacent to the Baca National Wildlife Refuge that manages a public hunting program to help Colorado Parks and Wildlife with elk management in the San Luis Valley, and

WHEREAS, hunting historically occurred and continues to occur on the Medano Ranch under private ownership, and

WHEREAS, Colorado Parks and Wildlife biologists have noted that hunting on the Medano Ranch is helpful in meeting management objectives approved by the Colorado Parks and Wildlife Commission, and

WHEREAS, Colorado Revised Statutes § 33-1-101 states that the state shall utilize hunting, trapping, and fishing as the primary methods of effecting necessary wildlife harvests, and

WHEREAS, the State of Colorado's ability to effectively manage the Great Sand Dunes elk herd through a managed hunting program would be further limited by transfer of the Medano Ranch to Great Sand Dunes National Park where hunting is not allowed, and

NOW, THEREFORE, BE IT RESOLVED, that the Colorado Parks and Wildlife Commission supports the National Park Service's acquisition of the Medano Ranch, and

NOW, THEREFORE, BE IT FURTHER RESOLVED, that the Colorado Parks and Wildlife Commission supports management under the jurisdiction of the Great Sand Dunes National Preserve and recognizes that doing so will provide additional management flexibility needed to achieve wildlife management objectives defined by the State of Colorado in partnership with the National Park Service.

Adopted November 16, 2017

John Howard, Acting-Chair
Colorado Parks and Wildlife Commission

PWCR 17-02

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



*For Wildlife-
For People*

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.

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
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Members, Robert Bray • Brad Coors • Rick Enstrom • Richard Ray • James McAnally • Ken Torres
Ex Officio Members, Russell George and Don Ament

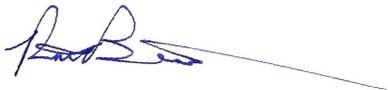
The above statements refer only to the National Preserve and those National Forest lands which are accessible only through National Park lands. Overall harvest in unit 82 is significantly greater. For example in 2005, total harvest in unit 82 was estimated at 332 elk. Of those 332 harvested elk, 215 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.

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

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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

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*For Wildlife-
For People*

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

Dear Mr. Chaney,

On behalf of the Colorado Division of Wildlife (CDOW), I would like to thank you for the opportunity to comment on access issues in the Great Sand Dunes National Park and Preserve (GRSA).

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

GRSA lies within an area designated by the CDOW as Data Analysis Unit (DAU) E-11. DAU E-11 is a geographical elk management unit which is one of five DAU's that occur in the San Luis Valley. The population objective in E-11 was set at 1500 animals in 1995. Over the last decade, our ability to maintain this herd of animals at that objective has become compromised due to elk pioneering into areas where they had previously been less numerous. These areas include lands owned by the National Park Service, The Nature Conservancy and the Baca Grande Ranch which provide added refuge areas especially during hunting seasons. This has lead to very limited opportunity for harvest and a population of elk that is now at a level nearly four times that of the DAU plan objective.

It has become apparent that the excessive number of elk are having an impact on the habitat resources on both public and private lands. The DOW staff in the SLV has heard from both private landowners and the United States Forest Service regarding impacts they have realized. Private land damages result in a negative economic impact to the landowner and results in DOW liability for game damage caused to raw agricultural products by big game. Other impacts include, but are not limited to, possible competition with bighorn sheep for resources throughout the Sangre de Cristo Range and apparent competition with mule deer throughout E-11. A documented, downward trend in both species has been realized during the same time period that elk numbers have increased. As you are aware, the DOW is currently involved with the NPS in an Elk research effort designed to determine impacts to native vegetation by elk in the Park and to assess elk susceptibility to harvest.

Issues

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

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- 2) Proposed access nodes limit public hunter access to the GRSA and public USFS lands. Adequate female (cow) elk harvest is critical to the management of elk population numbers within DAU E-11. With limited access and retrieval opportunities, hunters are less likely to harvest a female animal due to the distance they will have to travel to pursue elk and to move them back to their vehicle.
- 3) As proposed, access allowed to hunters along the Liberty Road would require a hunter to secure a permit to transport firearms and game prior to entering NPS lands. It is anticipated that access will primarily occur during hours when the NPS personnel are not available to issue such permits.

Alternatives

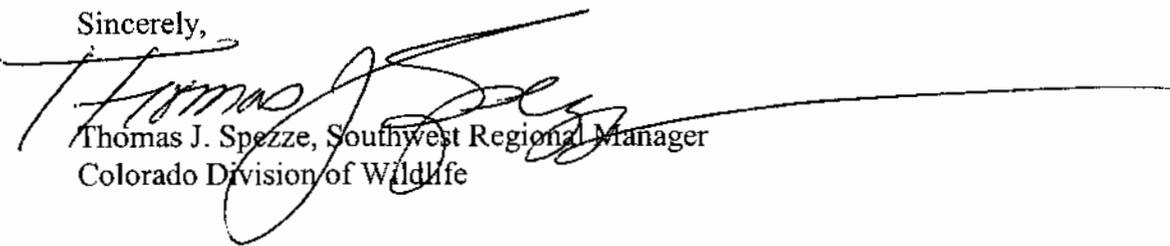
- 1) The DOW would like to propose to allow a designated area as "back country adventure" along with the designation of an area that allows for public vehicular access for the purpose hunting recreation and game retrieval. Specifically, to allow public access along the Liberty Road to allow access to USFS lands from a designated public parking area.
- 2) Public access allowed for hunting recreation and game retrieval will not require a NPS permit for firearms possession while engaged in hunting related activities.

The Division of Wildlife is very concerned with current language in the GRSA Management Plan which is expected to result in a limited opportunity for adequate elk harvest and retrieval within DAU E-11. Most importantly is the continued, apparent degradation of natural systems occurring on both public and private lands within DAU E-11 both within and adjacent to the Great Sand Dunes National Park. The Division of Wildlife greatly appreciates the joint collaboration occurring between the DOW and the NPS regarding elk research in the Park. We also look forward to a continued development of our working relationship with the NPS as future management of the GRSA unfolds.

If you have any questions, please let me know or contact Rick Basagoitia, Area Wildlife manager at the Monte Vista Service Center.

Again, thank you for the opportunity to comment on this important document!

Sincerely,



Thomas J. Spezze, Southwest Regional Manager
Colorado Division of Wildlife



COLORADO

Parks and Wildlife

Department of Natural Resources

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Ms. Lisa Carrico, Superintendent
Great Sand Dunes National Park
11500 State Highway 150
Mosca, CO 81146

October 28, 2014

Dear Ms. Carrico,

On behalf of the Colorado Parks and Wildlife (CPW), I would like to thank you for the continuous, long-term cooperation between our agencies and the opportunity to comment on the **UNGULATE MANAGEMENT PLAN AND EIS** as provided by the National Park Service (NPS). My staff and I have reviewed the newsletter, including the suite of alternatives and are providing comments in the format of the questions you pose.

Our comments focused primarily on elk management. Without increased harvest the elk population in this unit will continue to exceed the population objective. In the past 20 years elk have sought refuge and established themselves on areas that are now part of the Great Sand Dunes National Park (GRSA). Without an effective elk dispersal plan elk numbers will continue to grow and a resident herd established, to the point that elk cause great resource damage to the landscape and negative impacts to other wildlife.

The State of Colorado considers bison domestic livestock, so CPW has little role in their management and will have few comments in their regard. Bison are additional AUMs on the range and need sufficient habitat. Bison may out-compete native wildlife for limited resources and may limit habitat utilization by other species.

Is this a sufficient range of alternatives? If not, what other alternative(s) should the NPS consider? Currently the four proposed alternatives offer non-lethal hazing and lethal removal for dispersal by agency sharpshooters. The last three also include lethal removal for population management by agency sharpshooters. CPW believes that the strict adherence to a tiered approach is flawed as it does not take into account elk behavior. CPW understands NPS's desire to take a tiered approach, allowing time to see what happens and to see what is acceptable. However, our experience is that the reverse approach is actually effective. When using lethal removal early, the elk respond immediately and their dispersal behavior changes significantly. Non-lethal harassment is much more effective used in tandem with or immediately following lethal removal. It has been our experience that we can remove fewer animals if we begin lethal removal early. We suggest this should be added to your range of alternatives.

Currently, the Medano Ranch is still in private ownership, where hunting has occurred. Hunting and harvest on the Medano Ranch is incredibly helpful in our ability to manage this elk herd. We suggest that allowing hunting to occur on the Medano Ranch (as long as it is in private ownership, up to and including the final closing if and/or when it sells) should be added to your range of alternatives.



Are there specific elements of the preliminary alternatives, including management tools, which should be changed? If yes, how would you change them? Please see previous comments with regard to dispersal techniques and hunting the Medano Ranch.

Wilderness - CPW normally supports wilderness designations for remote, high elevation areas where elk do not congregate, except during the summer months, and are most often forced out as snow begins to accumulate. Wilderness designation on elk winter range creates an entirely different situation. In the context of the Great Sand Dunes National Park, elk could congregate in the area proposed for wilderness and find refuge from hunters or agency personnel. A minimum tools analysis would need to be done for agency personnel to conduct management actions, and the inability to use certain tools could severely hinder CPW's ability to effect management. This is especially true when time is of the essence to address a serious wildlife conflict or management situation.

For the most flexibility for elk management, CPW recommends no wilderness designation or completion of a minimum tools analysis up-front to ensure that CPW staff have the ability to manage big game efficiently and without additional fiscal burdens.

What do you like and/or dislike about the preliminary alternatives? CPW appreciates the cooperation and coordination that has occurred in the development of these alternatives. They clearly reflect the on-going effective communication between our agencies.

What issues should the NPS consider when evaluating future bison and elk management? Elk and bison are both large ungulates that can impact habitats significantly. Elk also have the capability of rapid population growth under some conditions. This population of elk exhibits low calf recruitment, which may slow or limit population growth somewhat. However, this elk herd is significantly over population objectives. While the landscape may appear able to sustain significantly more grazing, there are large tracts of land that are not utilized by elk or bison. Elk and bison have "preferred habitats" that they are reluctant to leave, often until the habitat is over utilized or damaged.

In summary, elk are an important and charismatic species that is challenging to manage. Where public hunting is not available it is more difficult to conduct elk population management and dispersal. CPW asks that the Greater Sand Dunes Ungulate Management Plan provide as much management flexibility and as many management tools (e.g., harassment and lethal removal techniques along with appropriate minimum tools for wilderness areas) as possible.

Thank you for this opportunity to comment. We appreciate your efforts thus far and look forward to future collaboration. If you have any questions or concerns regarding these comments, please contact Rick Basagoitia at (719) 588-8200 or via email at rick.basagoitia@state.co.us.

Sincerely,



Rick Basagoitia,
Area Wildlife Manager - San Luis Valley

xc: SWRO, Area 17

STATE OF COLORADO

Bill Ritter, Jr., Governor
DEPARTMENT OF NATURAL RESOURCES
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Kit Page
District Manager
Colorado State Land Board
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Alamosa, CO 81101

Dear Mr. Page,

On behalf of the Colorado Division of Wildlife, I thank you for the opportunity to comment on the trade of parcels between the State Land Board and the Great Sand Dunes National Park.

We provided two letters to the National Park Service during one of the previous commenting periods regarding the trade of parcels. The comments made in those letters are still valid, so I will provide a copy of them as attachments to this letter. At this time, we do have additional comments that we would like you to consider.

We continue to have the same elk management issues that are described in the attached letters. Our comments, then and now, are geared towards establishing and/or maintaining the population management tools we have at our disposal. The most acceptable of those tools is to use public hunters to manage this population of elk.

As a request to the pending land exchange of State Trust Lands leased by the Nature Conservancy in Alamosa and Saguache counties to BLM. The Division of Wildlife would like to ask that the current recreation leases be honored through the lease year of 2010.

Currently, the Division of Wildlife holds a recreation lease on State Trust lands that is valid through the year 2013. As part of Commission regulation #903 (116), the Division of Wildlife allows access for the purposes of elk management on these parcels set for exchange with BLM/National Park Service.

Honoring these leases through June 2010 would adhere to the annual fiscal payment made by the Division of Wildlife to the State Land Board. It would also give the Colorado Wildlife commission opportunity to remove regulation #903 (116) from the books during our Chapter 9 revision period in January of 2010.

I appreciate the opportunity to provide these comments and your consideration.

Sincerely,


Rick Basagonia
Area Wildlife Manager – San Luis Valley
Colorado Division of Wildlife