



December 15, 2023

USFS Hahns Peak Bears Ears Ranger District  
Att: Samuel Hahn  
925 Weiss Road  
Steamboat Springs, CO 80487

RE: Walton Peak East Vegetation Management Project

Dear Mr. Hahn;

Please accept this correspondence as the support of the above Organizations for the Walton Peak East Vegetation Management project in its current unaltered form. The Organizations believe the project is a significant step towards ensuring a healthy and vibrant ecosystem that is also fire resistant throughout the planning area. This fire resistance is becoming a larger and larger priority every year in the state of Colorado as evidenced by historically large fires in the area, such as the Mullen Fire in Southern Wyoming and the East Troublesome fire that almost destroyed the Grand Lake Community. While these fires were devastating, we are also aware that these fires could have been much worse and these expanded impacts were only limited by the systemic use of vegetation management projects such as the Walton Peak effort.

The Organizations are aware that there are possible impacts to motorized access that could result from the Proposal, as the area is globally recognized destination for motorized recreational opportunities, especially in the winter. The scoping notice is unclear reading the general site of the Proposal for treatment, proposed location of haul roads and timing of the project. As a result, The Organizations would ask that you coordinate with local snowmobile and motorized interests to minimize the possible impacts to these dispersed motorized opportunities that may result from hauling of logs or plowing of roads. We have seen significant benefits from this type of coordination. Coordination such as this aids the contractors performing the work, as public traffic may be removed from haul roads/routes and public would be avoiding use of parking lots that might be used as headers for timber activities each of these making timber efforts quicker and safer. This type of coordination has been hugely successful in other locations in the State as it maintains recreational access to areas that are being used for timber efforts when timber is not being actively harvested or through the temporary reroute of access routes in or through the area for the duration of the project. We also believe that coordination with motorized interests on simple issues such as this could

restore trust and communication between the interest groups and lands managers. This restoration could be as valuable to this relationship as the fuels treatment effort is to forest health.

Unfortunately, The Organizations are compelled to address several issues that were raised at the public meeting on the Proposal. The Organizations support the Proposal in its current form, which is proceeding under a Categorical Exclusion for NEPA purposes under the authority of the Healthy Forest Restoration Act of 2014. We support this decision and direction of analysis as it is quick and efficient. Most of the concerns that we heard raised in the public meeting included, such as altering travel management in the area or possible impacts to endangered lynx that might be in the area, would significantly alter the Project. Permanent alteration of the travel management in the area would remove the project from one that could proceed with a CE and would be opposed by us for this reason. We would also like to avoid reopening several painful travel and recreation decisions that have occurred on Rabbit Ears Pass over the last several years. We would hope that at some point, other issues on the district could be addressed.

The final issue that was raised at the public meeting was possible short and long term impacts to the Canadian Lynx as a result from the project. We would like to call your attention to the 2023 Lynx Assessment Update and 2023 Lynx Recovery Plan that were released this month.<sup>1</sup> The newly released Lynx management documents continue to address the lack of relationship between lynx and recreation started in the 2013 Lynx Conservation Assessment and Strategy. The 2023 documents step even further away from previous concerns about possible impacts from dispersed recreation with the following conclusions:

“As we concluded in the 2017 SSA, we find no evidence that habitat loss and fragmentation from anthropogenic activities (e.g., energy development, recreation, urban development and other sources of commercial development) have had population-level negative consequences for resident lynx in the DPS range or resulted in extirpation of lynx from areas that previously supported persistent resident populations. However, recent and projected increases in wildfire size, frequency, and intensity and its potential to permanently convert lynx habitat to non-habitat in some places, could result in future loss and fragmentation of lynx habitats at biologically meaningful scales.”<sup>2</sup>

This 2023 Lynx Assessment and Recovery plans provide extensive discussion and analysis about the positive

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<sup>1</sup> A complete copy of the 2023 Assessment, recovery plan and related documents is available here: [Canada lynx draft recovery plan available for public review & comment | U.S. Fish & Wildlife Service \(fws.gov\)](#)

<sup>2</sup> U.S. Fish and Wildlife Service. 2023. Species Status Assessment Addendum for the Canada lynx (*Lynx canadensis*) Contiguous United States Distinct Population Segment. December 2023. Denver, Colorado. 122 pp @ Pg 46.

impacts that projects such as the Proposal could have on lynx and why projects like this should improve lynx habitat significantly. At some point, the Organizations would also like to be able to undertake a project without having to worry about lynx management questions as CPW has found the Canadian Lynx population in the state to be well above goals for the reintroduction for decades.

The Organizations would like to reaffirm our support for the project in its current form and again ask for coordination of the project with motorized interests over the course of the project to avoid unintended impacts to recreational activity in the planning area. Please feel free to contact Scott Jones, Esq. or Edward Calhoun if you should wish to discuss any of the issues that have been raised in these comments further. Scott Jones contact information is phone 518-281-5810; email Scott.jones46@yahoo.com or Edward Calhoun contact information is phone 970-819-7006 or via email at ecalhoun55@gmail.com

Respectfully Submitted,



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