



May 13, 2022

Dixie Diltz
Rio Grande County
Land Use Administration
25 6th Street Room 208
Del Norte, CO 81132

RE: Response to Site Plan and application submitted for Summitville RV Park

To Ms. Diltz and the Planning Commission;

Please accept these comments regarding the proposed Summitville RV Park.

The San Luis Valley Ecosystem Council (SLVEC), a local public lands advocacy organization, is providing these comments with the intention of informing the Commission regarding our basic understanding of the current land use and jurisdiction that is presently occupying the area near the proposed Summitville RV Park. We will also try and address, to the best of our ability, without seeing any current analysis of the proposal, our concerns regarding the impact to nearby public lands.

First of all, it needs to be stated that the application does not provide much baseline information regarding the proposed project area, the maps that are submitted to accompany the proposed site development (wetlands and soil for example), do not include the area of the site development itself, (that is submitted as a separate map), which makes it more difficult to visualize the proposed area, in relation to the elements highlighted on the other maps.

We also understand that the land was valued at \$ 22,000 and was sold for \$700,000, which implies that the land was purchased for development purposes. This is of concern to us, because of its proximity to Rio Grande National Forest (RGNF) lands.

Here is our understanding regarding nearby lands: (Please see the maps we provided)

- The parcel has National Forest land to the north and, according to the Rio Grande County GIS Parcel Viewer (<https://portico.mygisonline.com/html5/?viewer=riograndeco>) the county owns the land to the south, east, and west (i.e., most or all of the rest of the mining claim).
- The National Forest land adjacent to the parcel is managed as General Forest, according to the recent management plan. Some of the land to the south of the mining claim is Colorado Roadless.

- The RGNF included some of the land north of the parcel and the roadless area south of the mining claim in their wilderness evaluation but did not recommend these areas as wilderness.

Here are some biological characteristics of the area, though not extensive

- The parcel is within the Colorado Natural Heritage Program Potential Conservation Area (PCA), Park Creek at Summit Pass which has high biodiversity significance (3 on a scale of 1 to 5 with 1 having the most biodiversity significance). *The PCA report for this area is attached.* The occurrence of globally imperiled (G2/S2) plant species, San Juan Draba (*Draba graminea*), mentioned in the report, may overlap the location of the proposed RV park.

(From Wikipedia) *Draba graminea* is a species of flowering plant in the mustard family known by the common names Rocky Mountain draba and San Juan Whitlow-grass. It is endemic to the state of Colorado in the United States, where it is limited to the San Juan Mountains. This species is a small perennial herb forming a clump just a few centimeters tall. Threats to the species are uncertain due to the remoteness and inaccessibility of the habitat. *The main threat is thought to be recreational activity.*

- The western side of the parcel (*that is not proposed to be developed*) overlaps a Colorado Parks and Wildlife (CPW) Aquatic Sports fish Management Water high priority habitat area.
- The parcel is within bighorn sheep overall range, a black bear concentration area, elk production (*breeding, calving*) area, and elk migration corridor. The elk production area and elk migration corridor are considered to be high priority habitat by CPW.
- **Impacts to certain Species of Conservation Concern (SCC) would occur.**
This development would likely cause the elimination of a very important Breeding Bird Survey (BBS) Route for Colorado. BBS Route 17154 (Summitville) starts along Pinos Creek and follows the 330 Rd to Summitville. It ends at the west end of the wetlands complex at Summitville. It samples avian population trends on an annual basis with population trend information assessed over time. The high elevation wetlands at Summitville are a key part of this sample. This entire route would likely have to be eliminated since the RV park would be adjacent to a key high-elevation willow area and disturbance would occur all along the road-based sample route. <https://www.pwrc.usgs.gov/bbs/RouteMap/Map.cfm#>
(List attached)
Background-See Breeding Bird Survey. BBS - USGS Patuxent Wildlife Research Center
The North American Breeding Bird Survey (BBS) is a large-scale, long-term monitoring program designed to track the status and trends of North American bird populations.
www.pwrc.usgs.gov
- All of these species mentioned above are potential concerns - the Heritage Program plants sites, elk concentration and migration corridors, avian populations, etc. would all have to be evaluated as connected actions thru the Forest Service permit and/or private developer because the impacts are connected through the Alaska National Interest Lands Conservation Act (ANILCA), as has already been challenged through another Forest Service Record of Decision (ROD).

Our concerns are numerous, especially at this altitude of 11,500 ft. and the remote character of the area, specifically regarding health and safety, including emergency issues, which needs to have its own separate analysis.

- There will be environmental impact, so site specific analysis for this area, must occur. Due to its proximity to the National Forest, an environmental analysis, in the form of, at a minimal, an Environmental Assessment, and likely an Environmental Impact Statement (EIS) supervised through the US Forest Service, in conjunction with Colorado Parks and Wildlife, with consultation from US Fish and Wildlife Service, and paid for by the developer, needs to be requested by Rio Grande County. Likely a connected action through a Forest Service permitting process would be engaged.
- There is a high potential for cumulative effects on National Forest Service lands. This will need to be evaluated thoroughly.
- Why 54 units? What site specific analysis has been done to justify that number of units? Analysis needs to occur to assess what, if any, is the appropriate number of units for that area.
- There may be as many as 400 individuals up there at one time, what is the capacity of that area to absorb that many people in one place? It will absolutely impact the surrounding landscape. People will be spreading out and recreating onto the nearby public lands. It's creating its own "Wildland Urban Interface" or WUI, which means the proposed RV Park will dominate nearby public land use and likely impact other present uses.
- The proposal specifically states that "no water" will be available at the RV sites. RV's will have to be self-contained, in terms of water and waste disposal. This brings up many concerns, fire safety of course, but also, what happens if an RV runs out of water? Will they use nearby areas to access water? This could create impact that is not being addressed at all in this application. Also, RV's will dutifully pack out their waste? **How will that be supervised?**
- The SLV Ecosystem Council, and previous fiscal sponsor, Citizens for San Luis Valley Water, wrote the Technical Assistance Grant (TAG) to oversee the Summitville Mine clean up in the early 90's and visited that area regularly for almost a decade. We were given a tour in 2011 when the Colorado Dept. of Public Health and Environment (CDPHE) and Environmental Protection Agency (EPA) completed their site reclamation and engineered a new water treatment facility. It was quite a feat. It's difficult to picture 54 RV's heading up there, every two weeks, after all that time and effort was dutifully engaged, to reclaim that area. Is there compatibility? Does an RV Park belong there? By the end of the "summer" season, there may be close to 500 RV's that have traveled up and down Forest Service RD 330. **Who will be servicing/maintaining that road?**
- There would have to be major reconstruction on FS Rd. 330 to accommodate the RVs going to and from this location. The way the road is now, they can't even pass each other, let alone the struggle these recreational vehicles would endure to get up there. This major RECONSTRUCTION will require an analysis of the cumulative effects associated with that construction. **Who is going to pay for this?**

- We assume a Forest Service permit for RD 330 will be required, and/or some other type of permit. This means that the development footprint on private land is a connected action through ANILCA, and will need to be evaluated that way, including private land impacts on Threatened and Endangered (T & E) species. The RGNF would need to assess and consult on the private land development thru their permitting actions, as well as any cumulative effects along the entire roadway.
- Summitville was a superfund site, so the CDPHE and EPA, would have a much better idea of the concentration of mine tailings that are still stored there. Even if these tailings are not directly on the proposed RV site itself, SLVEC recommends getting a site analysis from these agencies to ascertain what potential health risks might be associated due to the proximity of potential exposure to mine tailings and/or other chemical substances used during the operation of Summitville. Please don't forget air quality,

Thanks for providing the opportunity to respond to this RV proposal. In general, it is our opinion that there are plenty of places to recreate throughout the San Luis Valley, and for the most part, they are accessible and well-maintained. Though we know there are more people wanting to experience the SLV, careful planning and coordination with the appropriate agencies is what will make the difference, in terms of sustainable management. SLVEC does not see this type of planning and management being offered in this Summitville, RV proposal.

There is too much of a reliance on public lands management being the default, which apparently the proponents haven't even begun to think about, to pick up the inevitable results of human impact. This is a clear example of the potential of "privatize profits and socialize losses." The wildlife and surrounding environment usually suffers the most.

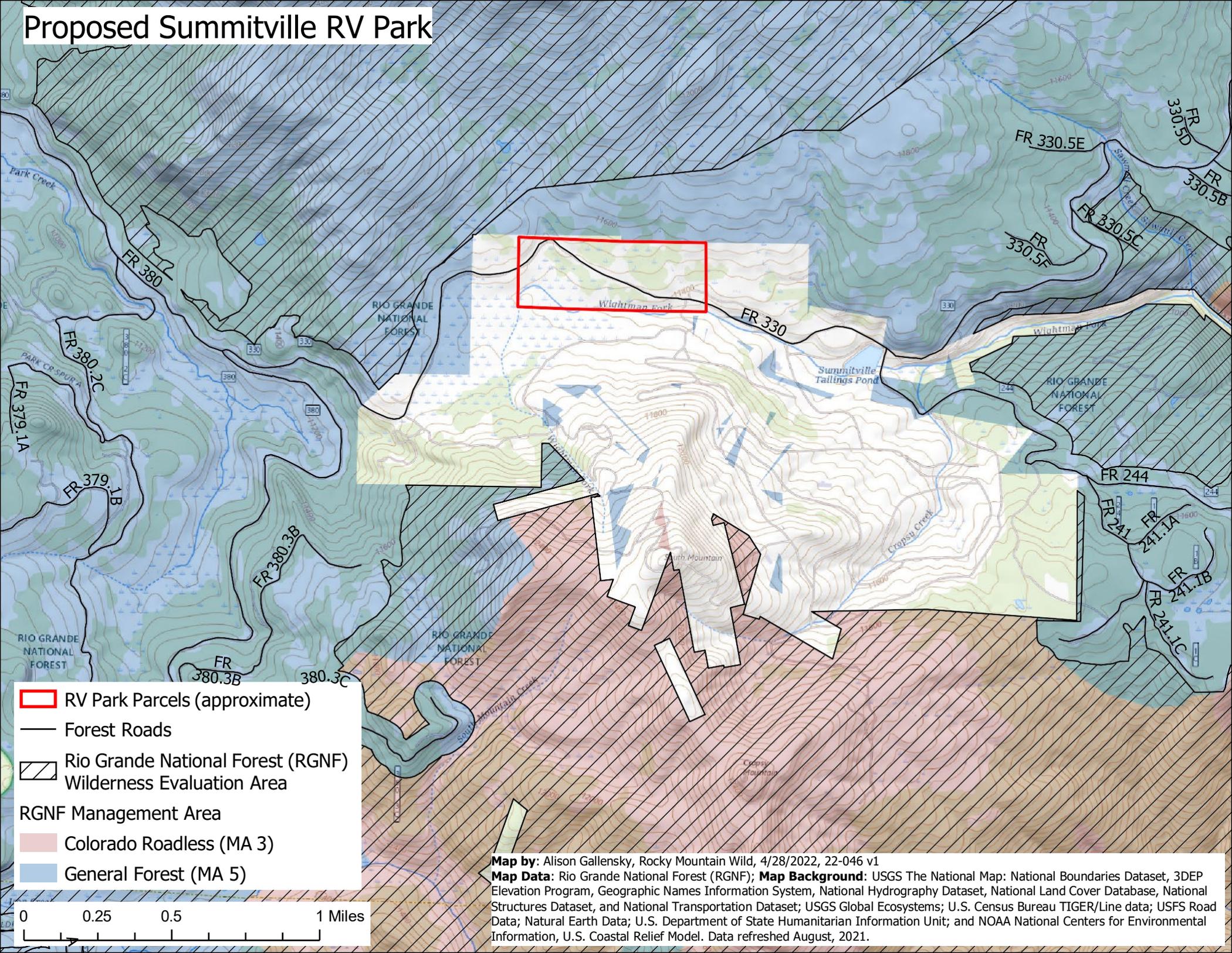
Thanks for your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Christine Canaly". The signature is written in a cursive, flowing style.

Christine Canaly, Director
San Luis Valley Ecosystem Council
P.O. Box 223, Alamosa, CO 81101
(719) 589-1518, info@slvec.org, www.slvec.org

Proposed Summitville RV Park

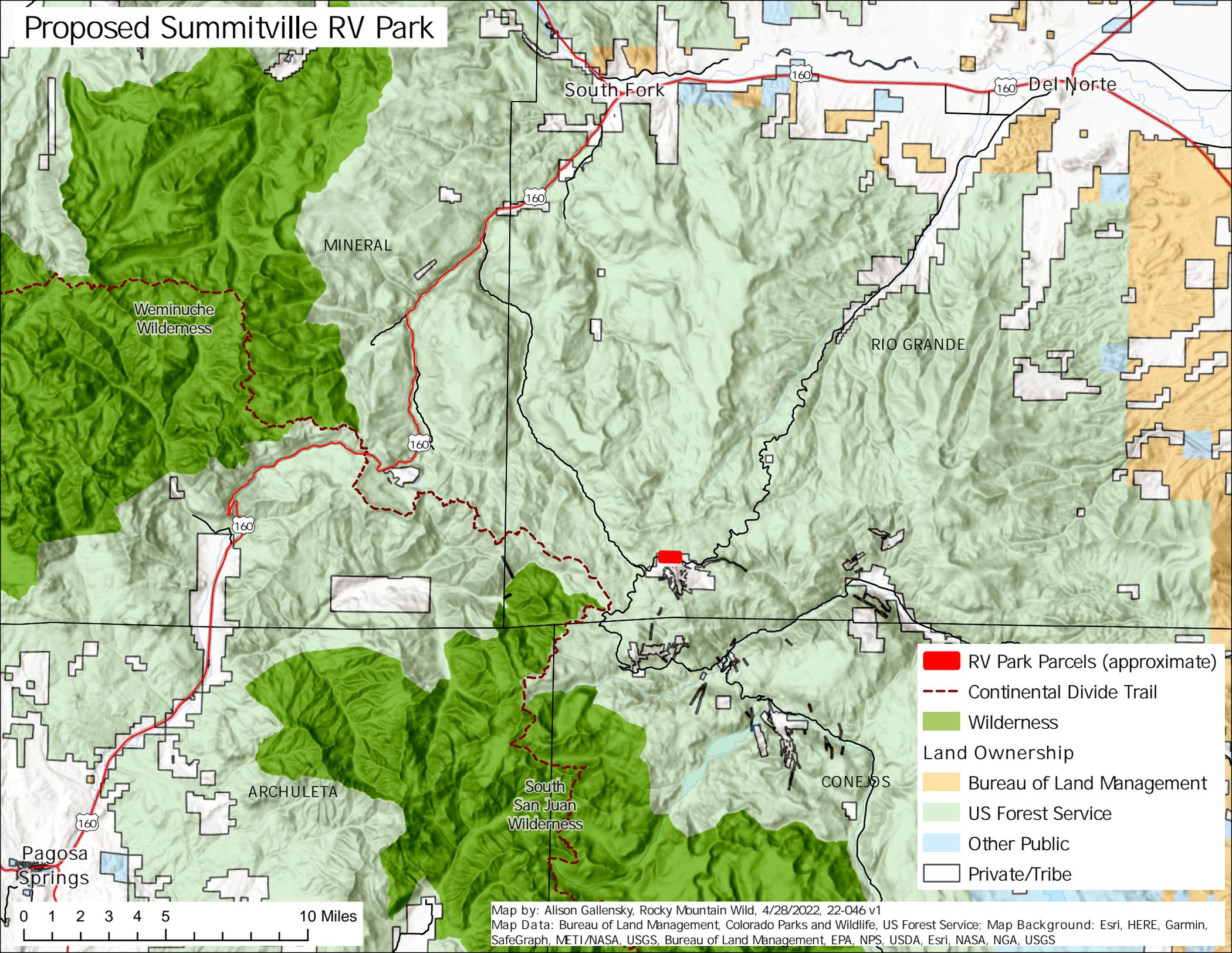


-  RV Park Parcels (approximate)
-  Forest Roads
-  Rio Grande National Forest (RGNF) Wilderness Evaluation Area
- RGNF Management Area**
-  Colorado Roadless (MA 3)
-  General Forest (MA 5)

0 0.25 0.5 1 Miles

Map by: Alison Gallensky, Rocky Mountain Wild, 4/28/2022, 22-046 v1
Map Data: Rio Grande National Forest (RGNF); **Map Background:** USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road Data; Natural Earth Data; U.S. Department of State Humanitarian Information Unit; and NOAA National Centers for Environmental Information, U.S. Coastal Relief Model. Data refreshed August, 2021.

Proposed Summitville RV Park



Weminuche
Wilderness

MINERAL

South Fork

Del Norte

RIO GRANDE

ARCHULETA

South
San Juan
Wilderness

CONEJOS

Pagosa
Springs

- RV Park Parcels (approximate)
- - - Continental Divide Trail
- Wilderness
- Land Ownership
 - Bureau of Land Management
 - US Forest Service
 - Other Public
 - Private/Tribe

0 1 2 3 4 5 10 Miles

Map by: Alison Gallensky, Rocky Mountain Wild, 4/28/2022, 22-046 v1
Map Data: Bureau of Land Management, Colorado Parks and Wildlife, US Forest Service; Map Background: Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, Esri, NASA, NGA, USGS

Level 4 Potential Conservation Area (PCA) Report

Name Park Creek at Summit Pass

Site Code S.USCOHP*20361

IDENTIFIERS

Site ID 1852 Site Class PCA
 Site Alias None

Network of Conservation Areas (NCA)

<u>NCA Site ID</u>	<u>NCA Site Code</u>	<u>NCA Site Name</u>
-		No Data

County

Rio Grande (CO)

SITE DESCRIPTION

Site Description

The site is along a small stream near the Continental Divide. The area along the stream and lower slopes is dominated by herbaceous species growing on gravelly soils. A major Forest Service road occurs on a slope above the site and a two-track road crosses the stream at the lower end.

Key Environmental Factors

No Data

Climate Description

No Data

Land Use History

No Data

Cultural Features

No Data

Minimum Elevation	11,000.00 Feet	3,353.00 Meters
Maximum Elevation	11,200.00 Feet	3,414.00 Meters

SITE DESIGN

Site Map P - Partial Mapped Date 01/15/2000
 Designer Kettler, S.M.

Boundary Justification

The boundary was drawn to include the known extent of the plant populations, adjacent similar habitat to provide areas for the plant to colonize in the future, and includes the parts of the roads near the plant occurrences which have the greatest chance of impacting the imperiled plant. These boundaries were delineated because major changes in sedimentation and erosion, or invasion of non-native species along the roads could impact the population.

Primary Area	2,720.38 Acres	1,100.90 Hectares
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SITE SIGNIFICANCE

Biodiversity Significance Rank B3: High Biodiversity Significance

Biodiversity Significance Comments

The site contains a good (B-ranked) occurrence of a globally vulnerable (G3/S3) plant species, Colorado Tansy-aster (*Machaeranthera coloradoensis*), and an unranked occurrence of a globally imperiled (G2/S2) plant species, San Juan Draba (*Draba graminea*).

Other Values Rank No Data

Other Values Comments

No Data

ASSOCIATED ELEMENTS OF BIODIVERSITY

<u>Element State ID</u>	<u>State Scientific Name</u>	<u>State Common Name</u>	<u>Global Rank</u>	<u>State Rank</u>	<u>Driving Site Rank</u>
23921	<i>Machaeranthera coloradoensis</i>	Colorado Tansy-aster	G3	S3	Y
17247	<i>Draba graminea</i>	San Juan Draba	G3	S3	N

Level 4 Potential Conservation Area (PCA) Report

Name Park Creek at Summit Pass

Site Code S.USCOHP*20361

LAND MANAGEMENT ISSUES

Land Use Comments

No Data

Natural Hazard Comments

No Data

Exotics Comments

No Data

Offsite

No Data

Information Needs

No Data

REFERENCES

Reference ID

Full Citation

165924

Kettler, S., J. Rocchio, R. Schorr, J. Burt. 2000. Biological Inventory of Rio Grande and Conejos Counties, Colorado. Unpublished report prepared for The Nature Conservancy. 234 pp.

ADDITIONAL TOPICS

Additional Topics

Original site design by Kettler, S.M. 2000-01-15. Revised by Panjabi, S. 2019-10-22. Boundary enlarged north and east to capture full extent of element occurrences.

LOCATORS

Nation United States

Latitude 372626N

State Colorado

Longitude 1063645W

Quad Code Quad Name

37106-D5 Summitville

37106-D6 Elwood Pass

Watershed Code Watershed Name

13010001 Rio Grande headwaters

13010002 Alamosa-Trinchera

VERSION

Version Date 10/22/2019

Version Author Panjabi, S.

DISCLAIMER

Level 4 Potential Conservation Area (PCA) Report

Name Park Creek at Summit Pass

Site Code S.USCOHP*20361

These data are a product and property of Colorado State University, Colorado Natural Heritage Program (CNHP). These data are strictly "on loan" and should be considered "works in progress". Data maintained in the Colorado Natural Heritage Program database are an integral part of ongoing research at CSU and reflect the observations of many scientists, institutions and our current state of knowledge. These data are acquired from various sources, with varying levels of accuracy, and are continually being updated and revised. Many areas have never been surveyed and the absence of data in any particular geographic area does not necessarily mean that species or ecological communities of concern are not present. These data should not be regarded as a substitute for on-site surveys required for environmental assessments. Absence of evidence is NOT evidence of absence. Absence of any data does not mean that other resources of special concern do not occur, but rather CNHP files do not currently contain information to document this presence. CNHP is not responsible for whether other, non-CNHP data providers have secured landowner permission for data collected.

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1991-2021 Breeding Birds Detected On Colorado's "Summitville" (17154) BBS Route

Canada Goose
Mallard
Dusky Grouse
Rock Pigeon
Eurasian Collared-Dove
Mourning Dove
Common Nighthawk
Broad-tailed Hummingbird
Sora
American Coot
Killdeer
Wilson's Snipe
Great Blue Heron
Golden Eagle
Sharp-shinned Hawk
Cooper's Hawk
Swainson's Hawk
Red-tailed Hawk
Great Horned Owl
Belted Kingfisher
Williamson's Sapsucker
Red-naped Sapsucker
American Three-toed Woodpecker
Downy Woodpecker
Hairy Woodpecker
(Red-shafted Flicker) Northern Flicker
unid. woodpecker
American Kestrel
Western Kingbird
Olive-sided Flycatcher
Western Wood-Pewee
Hammond's Flycatcher
Gray Flycatcher
Dusky Flycatcher
Cordilleran Flycatcher
Say's Phoebe
Plumbeous Vireo
Warbling Vireo
Canada Jay
Pinyon Jay
Steller's Jay
Blue Jay
Clark's Nutcracker
Black-billed Magpie
American Crow
Common Raven

Horned Lark
Tree Swallow
Violet-green Swallow
Northern Rough-winged Swallow
Barn Swallow
Cliff Swallow
Black-capped Chickadee
Mountain Chickadee
Juniper Titmouse
Red-breasted Nuthatch
White-breasted Nuthatch
Pygmy Nuthatch
Rock Wren
House Wren
Bewick's Wren
Blue-gray Gnatcatcher
Golden-crowned Kinglet
Ruby-crowned Kinglet
Western Bluebird
Mountain Bluebird
Townsend's Solitaire
Swainson's Thrush
Hermit Thrush
American Robin
Gray Catbird
European Starling
Cedar Waxwing
House Sparrow
American Pipit
Evening Grosbeak
Pine Grosbeak
House Finch
Cassin's Finch
Red Crossbill
Pine Siskin
Lesser Goldfinch
American Goldfinch
Lark Sparrow
Chipping Sparrow
Fox Sparrow
(Gray-headed Junco) Dark-eyed Junco
White-crowned Sparrow
Vesper Sparrow
Song Sparrow
Lincoln's Sparrow
Green-tailed Towhee
Spotted Towhee

Yellow-headed Blackbird
Western Meadowlark
Bullock's Oriole
Red-winged Blackbird
Brown-headed Cowbird
Brewer's Blackbird
Common Grackle
Orange-crowned Warbler
Virginia's Warbler
MacGillivray's Warbler
Common Yellowthroat
Yellow Warbler
(Audubon's Warbler) Yellow-rumped Warbler
Wilson's Warbler
Western Tanager
Black-headed Grosbeak
Lazuli Bunting