



June 1, 2018

Grand Mesa, Uncompahgre, Gunnison National Forests  
Attn: Plan Revision Team  
2250 South Main Street  
Delta, CO 81416

Subject: Forest Plan Revision Scoping

The Rocky Mountain Elk Foundation (RMEF) submits the following comments regarding the proposed forest plan revision scoping. We appreciate the opportunity to provide comments and input to the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) Forest Plan Revision. The mission of RMEF is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. Healthy wildlife habitat is one of our core values, and we are keenly interested in taking part in the planning process at the Regional and Forest level. The majority of wild free-ranging elk in the United States spend a portion of their lives on National Forests and Grasslands. Maintaining and enhancing elk country benefits a wide variety of wildlife including big game, upland game, waterfowl, song birds, and many aquatic species. Many of our 227,000 members are hunter-conservationists who pursue their hunting heritage on National Forest System (NFS) lands. This aligns with many aspects of the Forest Service mission as well.

## **Part 1: Forest Plan Vision, Roles and Contributions**

The GMUG National Forests provide essential habitat for a wide variety of wildlife and fish, and are national destinations for hunting and fishing as well as wildlife watching. Hunters and anglers have tremendous opportunities to enjoy large backcountry habitats in pursuit of fish and game, as well as the solitude and challenge of experiencing large intact landscapes.

RMEF appreciates recognition of the importance of the GMUG to elk, mule deer, bighorn sheep, moose, and a wide variety of game birds and trout species. This group of species attracts a large number of hunters and anglers and their incorporation provides a strong backdrop for representing the interests of several user groups.

## **Part II: Key Needs for Change**

### Contribute to Social and Economic Sustainability

RMEF encourages recognition of the social and economic benefits of hunting and angling and incorporation of these activities as a major consideration in the development of forest plan desired conditions for recreational value. According to Colorado Parks and Wildlife 2008 Economic Impact Report, hunting and angling contributed an estimated \$1.8 billion dollars to Colorado's economy and supported 21,000 jobs statewide. There is a need to provide quality,



intact habitat to support healthy populations of game and fish species in order to sustain hunting and angling opportunities and the social and economic benefits derived from such activities.

## Provide for Ecological Sustainability

RMEF strongly supports the use of fire and mechanical treatments as management tools to achieve the desired habitat conditions. Decades of fire suppression have reduced or nearly eliminated early and mid-seral successional stages across the National Forest System. Both prescribed burns and historical wildland fire patterns are vital for restoring the understory diversity found in healthy forests. In many forest types this understory provides crucial forage for elk and other wildlife. In many circumstances, species composition and the density and accumulation of forest vegetation make the use of fire both risky and costly. In those situations, mechanical thinning or other treatments may be appropriate before fire can be reintroduced. Early seral or early successional habitat can be achieved by mechanically thinning and restoring fire to more naturally open ponderosa pine, dry Douglas fir, larch, or similar types of stands. It is imperative that planning direction ensures that these projects are coordinated with the objectives for elk management.

RMEF encourages the Forest Service to employ grazing management systems and techniques compatible with maintaining desired levels of elk and other wildlife. Managed livestock grazing can improve the health of rangelands and forest meadows if the system is designed with habitat values for elk and other wildlife in mind. An effective range management program between the agency and permittees is essential to maintaining the economic base and lifestyle that have helped keep private lands across elk country as working ranches. Many of the base properties associated with grazing allotments provide important wildlife habitat and may constitute a large part of the winter range for elk. When these working ranches are sold, the end result is often subdivision or other development, reducing or eliminating historic wildlife values and open space on private property.

RMEF encourages the Forest Service to actively manage landscapes to control and reduce noxious weeds. RMEF is deeply concerned about the spread of noxious weeds and their negative effects on habitat. An essential element of restoration efforts is reducing the impact of noxious weeds on native ranges. Native plant communities provide the highest nutritional value for a variety of wildlife species, and non-native plant species invade and threaten our National Forests and grasslands. The RMEF encourages the Forest Service to address the scourge of noxious weeds with forest-wide plans and integrated weed management tools (biological controls, mechanical options, chemical treatments, and education).

## Maintain the Diversity of Plant and Animal Communities

RMEF encourages the Forest Service to utilize State Comprehensive Wildlife Plans and data in developing desired outcomes and monitoring results related to the management of elk and other wildlife species on the National Forest. RMEF works closely with each state's wildlife agency.





These agencies are our vital partners. In setting new management direction for elk habitat in forest plans and project design, we strongly encourage that the forest planning effort be discussed thoroughly with state wildlife agencies and that state agency goals for elk are integrated into the plan. The state wildlife agencies gather wildlife population trend data based on their management units. Where possible, it is beneficial to use these “units” as planning and monitoring units to achieve desired future conditions. It is important that the habitat managers (USFS) and the animal managers (State) work hand in hand to achieve mutual goals. Utilizing the state “units” for planning and monitoring also encourages incorporating the effects of private lands within the units into the overall elk management strategy. This joint planning approach will allow for the best utilization of limited project dollars by setting priorities.

RMEF believes that healthy, free-roaming elk herds contribute to and are intermingled with the social well-being, ecological integrity, cultural, and economic goals of the Forest. Because of this, we suggest that elk be considered a focal species and/or management indicator species in all planning efforts. Accordingly, the forest plan should provide specific direction for managing elk habitat. Much has been learned about elk habitat requirements in the past 25 years of research from the Starkey Project and other studies, and these findings can be used as a foundation for setting new directions. (Reference, *The Starkey Project: A Synthesis of Long-Term Studies of Elk and Mule Deer*. Alliance Communications Group 2005.) The developing elk models that emphasize summer nutrition, distance to roads, distance to cover, and slope are excellent tools for future management of National Forest lands in elk country. Much of what has been learned about elk habitat requirements will benefit a variety of wildlife species, particularly species associated with early seral forests and species that are sensitive to human disturbances.

RMEF encourages the Forest Service to use seed mixes of high quality native plants. Restoration of disturbed sites, both natural and man-caused, may require seeding or planting for soil stabilization or to create value as forage for wildlife and livestock. We encourage the use of native plant seed mixes, as well as non-native species that are not invasive. It may also be advisable to use non-native annuals as a nurse crop for native species, if necessary. Seed mixes should strive to achieve historic biodiversity.

### Integrate Resource Management for Multiple Uses and Ecosystem Services

RMEF encourages the Forest Service to manage vehicular traffic to minimize displacement of elk from public lands or over-harvest of elk on public lands, while still providing for recreational use. There must be close coordination between the forest plan and the travel management plan. Elk and many other wildlife species are sensitive to human travel patterns, especially motorized use. The Starkey Project research has done much to quantify effects of roads, trails, and associated motorized traffic on elk, and these findings are important to consider in forest plans and travel management plans. (Reference, *The Starkey Project: 42-52, 2005, M.M. Rowland, M.J. Wisdom, B.K. Johnson, and M.A. Penninger, 2005. Effects of Roads on Elk: Implications for Management in Forested Ecosystems.*) Motorized access in areas with high open road densities or substantial off-road vehicle use can displace elk to adjacent private land for part or





most of the year, resulting in several negative impacts. Hunters may no longer find elk on public lands in those areas. Private landowners may not tolerate large numbers of elk on their lands for long periods of time due to their impacts on grasslands, crops, and fences. Public lands are where the majority of the public hunts and otherwise enjoy elk. In some places a growing portion of elk are using private land. Where elk populations are at or over population objectives, please consider elk occurrence specific to Forest Service lands. In many situations the geographic units used to monitor elk population objectives are comprised of varying amounts of private ownership. The numbers may then not reflect elk use of Forest Service lands. An area can be over objective, with relatively low occurrence of elk on National Forest System lands. Due to the lack of elk on public lands and/or fewer hunters on private lands, the state wildlife agencies may have difficulty managing elk populations. The forest plan should set direction as to how large landscapes (e.g., watersheds or state wildlife management units) will be managed for combinations of cover, access, and topography to meet state wildlife agency population goals for elk harvest, and to enhance elk hunting opportunities. To be most effective, this direction should be developed cooperatively with state wildlife agencies. A stand is considered cover when it is 10 or more feet tall and has overhead canopy closure of 40% or more, as defined for all cover areas in the elk habitat effectiveness models. The broader definition of cover areas generally provides hiding cover and contributes to security for elk during hunting seasons.

RMEF is concerned about the loss of legal access to some National Forest System lands due to changing ownerships on adjacent private land. For many hunter-conservationists, public lands provide the best opportunity to pursue their hunting heritage. These activities deliver huge positive economic benefits for local communities, as well as cultural and social benefits. The forest plan should provide for the continuation of public-land hunting and recreational shooting as a valid and vital component of the recreation spectrum. The plan should also consider and give direction for maintaining such aspects as dispersed camping (old traditional camp sites), outfitters and guides, and travel management. Each National Forest plan should include travel access strategies with Right-Of-Way acquisitions as a priority. Executive Order 13443, dated August 17, 2007, directs federal agencies to emphasize the enhancement of hunting opportunities on federal lands. The Federal Lands Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding between the U.S. Department of Agriculture, the U.S. Department of the Army, and the U.S. Department of the Interior dated December 20, 2011 develops and expands a framework of cooperation among the parties at all levels for planning and implementing mutually beneficial projects and activities related to hunting, fishing, and shooting sports conducted on federal land. Elk hunting opportunities on National Forests are cherished by hundreds of thousands of hunters each year. RMEF has increased its focus on elk hunter access to large blocks of public land that are not currently accessible. We want to work with Forest staff to identify these areas and work with private landowners to purchase land or elk hunting access easements (permanent or long-term) that will provide access for elk hunters to large tracts of public land. This effort will provide more quality hunting experiences, and further the efforts of the state wildlife management agencies in achieving elk harvest levels that ensure elk population objectives can be met.





RMEF supports the Forest Service Open Space Conservation Strategy. Every year, our National Forests become more critical to elk and other wildlife due to habitat loss on private land. When privately owned wildlife habitat within or immediately adjacent to National Forest becomes available for purchase, we urge each forest to work with RMEF and other national and local conservation groups to acquire parcels, enter into land exchanges, or obtain conservation easements to secure more elk habitat for the future.

### Incorporate Best Available Science, Update to Existing Law and Policy

RMEF supports actively managed landscapes to enhance elk forage based on the best available science. We strongly believe that early seral habitat is underrepresented in most habitat types on the National Forests as a result of historic wildfire suppression policy and lack of active management. (Reference, *"The Forgotten Stage of Forest Succession: early-successional ecosystems on forest sites,"* Mark E. Swanson, Jerry F. Franklin, Robert L. Beschta, Charles M. Crisafulli, Dominick A. DellaSala, Richard L. Hutto, David B. Lindenmayer, and Frederick J. Swanson.) Recent studies have reinforced the importance of forage nutritional quality. Management to sustain large areas of elk habitat as forage areas, and to enhance the nutritional quality of these forage areas, are key aspects of elk habitat management that need explicit consideration in the forest plan. Limits on the nutritional resources available to elk in turn limit animal performance, and by extension, limit the productivity of herds, based on a variety of studies conducted. (Reference, *"Regional and Seasonal Patterns of Nutritional Condition and Reproduction in Elk,"* Rachel C. Cook, et al, *Wildlife Monographs* 184:1–44; 2013.) In a given watershed or other large landscape, striving to maintain at least one-half of the area defined as elk forage areas (per definition provided by elk habitat effectiveness models) is likely to be optimal, but nutritional enhancements in existing forage areas are equally important. Use of extensive broadcast burning programs, combined with various timber harvest and thinning practices, will help establish and/or sustain a variety of nutritious grasses, forbs, and shrubs that will significantly benefit elk. The forest plan should establish direction regarding how much area will be treated to establish and enhance forage areas for elk, indicate where the treatments will be targeted (which watersheds or other large landscapes), and describe the management activities that will be used to establish and sustain high quality elk forage areas.

RMEF appreciates the opportunity to comment on the planning process that is currently in progress and encourages the Forest to incorporate our suggestions. We deeply value our partnership with the Forest Service and will continue to support comprehensive planning efforts.

Sincerely,



Blake L. Henning  
Chief Conservation Officer