



July 22, 2019

GMUG National Forests  
Attn: Forest Plan Revision Team  
2250 S. Main St.  
Delta, CO 81416

Re: Grand Mesa, Uncompahgre & Gunnison (GMUG) Forest Plan Revision - Working Draft

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the working draft of the GMUG Revised Forest Plan (Plan). The mission of RMEF is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. RMEF's 234,000+ members include hunters, ranchers, guides, outfitters, other business owners, wildlife enthusiasts, and other conservationists who have both recreational and economic interests in hunting and enjoying elk on National Forests. Since its creation in 1984, RMEF has permanently protected and enhanced more than 7.4 million acres of North America's most vital habitat for elk and other wildlife, including more than 460,000 acres in Colorado. As such, RMEF has an interest in ensuring the future productivity of elk and other wildlife in Colorado.

RMEF recognizes that the Forest Plan Revision Process under the 2012 Planning Rule is designed to emphasize restoration of natural resources to make our National Forests more resilient to climate change, protect water resources, and improve forest health. We request that the following general recommendations be incorporated into the Forest Plan and in subsequent project design and implementation:

**Inclusion of elk and elk habitat in planning efforts:**

- Healthy, free-roaming elk herds contribute to and are intermingled with the social well-being, ecological integrity, and cultural and economic goals of the Forest. Because of this, RMEF suggests that elk and elk habitat be considered a focus for management planning efforts. Elk and other big game serve 'distinct roles and contributions' to multiple user types on the Forest (viewing, hunting, etc.) and the Forest Plan plays an important role in supporting future big game populations.

**Coordination with state wildlife agencies:**

- RMEF works closely with each state's wildlife agency. These agencies are our vital partners. In setting new management directions for elk habitat in forest plans and project design, we encourage that the forest planning effort be coordinated with state wildlife agencies and that state agency goals for elk are integrated into the plan. 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.



## Actively managed landscapes:

- Past and recent research has identified several challenges to North America's elk country, including unnaturally dense forests, invasions of noxious weeds, lack of dependable water sources, and many others. RMEF supports use of the past 25+ years of research from the Starkey Project and other studies that have laid the groundwork for managing healthy elk habitat (Quigley and Wisdom 2015). More recent research on ungulate migration (Sawyer et al. 2013, Middleton et al. 2013), nutrition (Cook et al. 2013, Wisdom et al. 2018), and elk security (Ranglack et al. 2017, Wisdom et al. 2018) continue to build on this foundation. RMEF recommends that recent research on the benefits of actively managed landscapes and relevant components of Executive Order 13855 on active management on America's forests (2018) be incorporated into the Plan.
- Early seral forest provides important habitat for elk and other wildlife, and is often achieved following disturbance such as fire and mechanical thinning. Decades of fire suppression have reduced early successional stages across the National Forest System. RMEF supports the use of mechanical thinning and prescribed burning to encourage growth of grasses, forbs, young shrubs, and trees which provide critical forage and cover for elk and other species (Swanson et al. 2011). Prescribed burns not only improve elk habitat, but can help reduce the threat of catastrophic wildfire in the future. RMEF supports this work which complements Forest Service fire, fuels, and vegetation management goals.
- RMEF supports balanced use of timber production and encourages consideration of wildlife habitat enhancement through timber production activities. Opportunities for timber production which can provide greater flexibility in using the full array of active vegetation management activities are more effective at meeting desired vegetative conditions.
- RMEF is very supportive of active management on our public lands to benefit wildlife habitat and fire risk management. Wilderness designation presents a concern, as these acres are not eligible for various active management activities. As such, RMEF supports management directions that limit additional Wilderness acreages.
- Noxious and invasive plants are slowly replacing native forage for elk and other species. RMEF encourages the Forest Service to actively manage landscapes to control and reduce noxious weeds through an integrated weed management approach (biological, mechanical, chemical, and outreach). Early detection and rapid response remains a critical component of effective weed management (Westbrooks 2004); RMEF encourages this collaborative approach for prompt containment and treatment of noxious and invasive plants. Native plant communities provide the highest nutritional value, thus RMEF encourages the use of native plant seed mixes.
- 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. RMEF encourages the Forest Service to employ grazing management systems and techniques compatible with maintaining desired levels of elk and other wildlife.





## **Resource management and land protection across land ownership:**

- Public lands are where the majority of the public hunts and otherwise enjoys elk. In some places a growing portion of elk are using private land. Where elk populations are at or over population objectives, RMEF suggests considering elk occurrence specific to USFS lands. In many situations the geographic units used to monitor elk population objectives are comprised of varying amounts of private ownership. The numbers may not reflect elk use of USFS lands. An area can be over objective, with relatively low occurrence of elk on National Forests. RMEF recognizes that some factors affecting elk distribution off of Forest Service lands are not due to Forest Service management. While multiple factors can affect distribution of elk and other big game across public and private lands, RMEF recommends inclusion of Desired Conditions that emphasizes coordination between the National Forest, state wildlife agencies, private landowners and others to provide habitat conditions that support year-round presence of elk and other big game on the Forest.
- Each 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 the National Forest becomes available for purchase, we urge the National 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.
- Wildlife connectivity is increasingly threatened by habitat loss and degradation as well as development activities. RMEF recommends Plan components that recognize the importance of big game migration corridors and include management direction for protecting corridors across National Forest and neighboring lands.

## **Management of motorized and non-motorized recreation:**

- Elk and many other wildlife species are sensitive to human travel patterns, especially motorized use. Research from the Starkey Project has done much to quantify effects of roads, trails, and associated motorized (Wisdom et al. 2005) and non-motorized traffic on elk (Wisdom et al. 2018). RMEF supports a balanced approach regarding the Recreation Opportunity Spectrum. Multi-use activities occur year-round and RMEF recommends that the Forest provide access for those seeking varied experiences (primitive and roaded). However, RMEF also recommends inclusion of Desired Conditions, Goals, and/or Guidelines that provide seasonal protection (during critical times) for elk and other wildlife from impacts of recreation (via roads, trails, and associated motorized and non-motorized traffic).

## **Public access and hunting heritage:**

- For many hunter-conservationists, public lands provide the best opportunity to pursue their hunting heritage. These activities deliver economic benefits for local communities, as well as cultural and social benefits. RMEF recommends inclusion of hunting, fishing, trapping, and shooting sports as contributing to local economies and the well-being and quality of life of National Forest users. The Forest Plan should provide for the continuation of these activities as a valid and vital component of the recreation spectrum. The Federal Lands Hunting,



Fishing & Shooting Sports Roundtable MOU between the U.S. Department of Agriculture, the U.S. Department of the Army, and the U.S. Department of the Interior (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, trapping, and shooting sports conducted on federal land.

- Identified as the largest barrier to maintaining hunting and angling participation, access to public land plays a critical role in ensuring the future of our hunting heritage. RMEF recommends consideration of public land access needs in forest planning efforts, including close collaboration with state wildlife agencies to create or maintain access points to the National Forest that are important for managing wildlife. In addition, RMEF recommends inclusion of relevant components within Executive Order 13443 on facilitation of hunting heritage and wildlife conservation (2007) and the John D. Dingell, Jr. Conservation, Management, and Recreation Act (2019).

**In addition to the above key concepts, RMEF submits comments specific to the proposed actions in the Draft Plan:**

- Key Ecosystem Characteristics (ECO): Table 1 identifies desired conditions of various ecosystem seral stages. The GMUG Analysis indicates a clear lack of early seral stages (and over-abundance of mid-seral) across the forest and ecosystems. As such, RMEF recommends a more aggressive reduction in mid-seral with increased acreage in early-seral across ecosystems. In addition, the proposed percent ranges for mid and late seral stages are so broad that for many ecosystems, current conditions already fall within the range of desired conditions; thus action to reduce those stages would not be prioritized. RMEF recommends narrowing or shifting the ranges for mid and late seral stages (in desired conditions) to accomplish a better balance of seral stages across the Forest.
- RMEF supports continued recognition of the importance of vegetation connectivity to support wildlife seasonal movements across the landscape (FW-DC-ECO-06).
- Snags and woody material FW-GDL-ECO-08: RMEF recommends separating desired targets for snags and woody debris. Creating an optimal range for snags, alone, would allow actions that target removal in high dense areas (i.e., beetle kill or disease kill areas).
- Old Growth FW0GDL-ECO-10: The minimum patch size increased from 30 acres in the previous plan to 640 acres in the proposed plan. RMEF suggests more flexible sideboards in minimum patch size to allow for larger, landscape-scale active management when opportunities arise.
- RMEF supports objectives, standards and guidelines outlined under Invasive Species (FW-DC-IVSP-01). RMEF appreciates the use of early detection and rapid response, integrated pest management, and the proposed decontamination approaches to prevent introduction of new species and further spread of existing invasives.
- Fire and Fuels Management Objective (FW-OBJ-FFM-01): RMEF recommends an increase in the proposed average number of acres treated per decade. The proposed acreage (120,600-





326,000) comprises less than 1% of the GMUG acreage. Increasing the proposed acreage would allow for better opportunity to fulfill direction identified under Executive Order 13855 on active management in National Forests. RMEF suggests removal of the upper acreage range which opens opportunities for larger, landscape-scale fire and fuels management, when opportunities arise.

- General Species Diversity FW-OBJ-SPEC-03: RMEF recommends a significant increase in the proposed acres of habitat restored or enhanced. The proposed acreage (25,000-80,000) represents a very small proportion of the Forest and should better represent the habitat restoration needed to support the diversity of species in the Forest. In addition, RMEF recommends objectives for restoring and enhancing big game winter range and summer forage quality in this section.
- Big Game Species: RMEF appreciates the attention to big game security areas during critical stages under FW-DC-SPEC-14 (migration corridors, production areas and winter range). RMEF requests additional language to support the inclusion of desired conditions/objectives that create and improve early seral forest conditions for high-quality big game forage; the importance of quality summer forage for elk should be accounted for explicitly in the Forest Plan. In addition, RMEF suggests including a desired condition for maintaining Colorado Parks & Wildlife's big game management objectives for quality hunting opportunities (and economic return).
- RMEF supports prioritization of new road/trail rights-of-way for hunting, fishing, and other recreation (FW-GDL-LSU-05).
- As indicated in the analysis, recreation will continue to increase on the GMUG and the Plan recognizes recreation as an ecosystem stressor. RMEF recommends adding desired conditions, including indication that recreational activities be planned and implemented in a manner that does not degrade or adversely affect forest resources, particularly big game species that can be sensitive to recreation (in FW-DC-REC-01).
- Monitoring: RMEF appreciates inclusion of big game habitat as a monitoring indicator, and suggests adding big game population objectives (as produced from Colorado Parks & Wildlife) as an additional indicator (Table 9).
- Socioeconomics: With more than 50,000 big game hunting permits issued within the GMUG, RMEF encourages specific references to hunting, fishing, and trapping as important economic sources in the desired conditions (FW-DC-SCEC-01). This is especially important given the declining trend of deer and elk in western and southwestern Colorado.

RMEF appreciates the opportunity to comment on the working draft of the GMUG Revised Forest Plan.

Sincerely,

  
Blake L. Henning  
Chief Conservation Officer



## References

- Cook, R.C., J.G. Cook, D.J. Vales, B.K. Johnson, S.M. McCorquodale, L.A. Shipley, R.A. Riggs, L.L. Irwin, S.L. Murphie, B.L. Murphie, K.A. Schoenecker, F. Geyer, P.B. Hall, R.D. Spencer, D.A. Immell, D.H. Jackson, B.L. Tiller, P.J. Miller, and L. Schmitz. 2013. Regional and Seasonal Patterns of Nutritional Condition and Reproduction in Elk. *Wildlife Monographs* 184:1-45.
- Exec. Order No. 13855, 84 FR 45. 2018. Promoting Active Management of America's Forests, Rangelands, and Other Federal Lands to Improve Conditions and Reduce Wildfire Risk. Pages 45-48.
- John D. Dingell, Jr. Conservation, Management, and Recreation Act. Pub. L. 116-9. (2019).
- Middleton, A.D., M.J. Kauffman, D.E. McWhirter, J.G. Cook, R.C. Cook, A.A. Nelson, M.D. Jimenez, R.W. Klaver. 2013. Rejoinder: challenge and opportunity in the study of ungulate migration amid environmental change. *Ecology* 94: 1280-1286.
- Quigley, T.M., and M.J. Wisdom. 2015. The Starkey Project: Long-term research for long-term management solutions. Pages 9-16 *in* Wisdom, M.J., technical editor, *The Starkey Project: a synthesis of long-term studies of elk and mule deer*. Reprinted from the 2004 Transactions of the North American Wildlife and Natural Resources Conference, Alliance Communications Group, Lawrence, Kansas, USA.
- Ranglack, D.H., K.M. Proffitt, J.E. Canfield, J.A. Gude, J. Rotella, and R. Garrott. 2017. Security areas for elk during archery and rifle hunting seasons. *Journal of Wildlife Management* 81:778-791.
- Rowland, M.M., M.J. Wisdom, R.M. Nielson, J.G. Cook, R.C. Cook, B.K. Johnson, P. Coe, J.M. Hafer, B.J. Naylor, D.J. Vales, R.G. Anthony, E.K. Cole, C.D. Danilson, R.W. Davis, F. Geyer, S. Harris, L.L. Irwin, R. McCoy, M.D. Pope, M. Vavra. 2018. Modeling Elk Nutrition and Habitat Use in Western Oregon and Washington. *Wildlife Monographs*. 199. 1-69.
- Sawyer, H., M.J. Kauffman, A.D. Middleton, T.A. Morrison, R.M. Nielson and T.B. Wyckoff. 2013. A framework for understanding semi-permeable barrier effects on migratory ungulates. *Journal of Applied Ecology* 50:68-78.
- Swanson, M.E., J.F. Franklin, R.L. Beschta, C.M. Crisafulli, D.A. DellaSala, R.L. Hutto, D.B. Lindenmayer, F.J. Swanson. 2011. The forgotten stage of forest succession: early-successional ecosystems on forest sites. *Frontiers in Ecology and the Environment* 9:117-125



Westbrooks, R.G. 2004. New approaches for early detection and rapid response to invasive plants in the United States. *Weed Technology* 32:1468-1471.

Wisdom, M. J., A. A. Ager, H. K. Preisler, N. J. Cimon, and B. K. Johnson. 2005. Effects of Off-Road Recreation on Mule Deer and Elk. Pages 67-80 in Wisdom, M. J., technical editor, *The Starkey Project: a synthesis of long-term studies of elk and mule deer*. Reprinted from the 2004 Transactions of the North American Wildlife and Natural Resources Conference, Alliance Communications Group, Lawrence, Kansas, USA.

Wisdom, M.J., H.K. Preisler, L. Naylor, R.G. Anthony, B.K. Johnson, M.M. Rowland. 2018. Elk responses to trail-based recreation on public forests. *Forest Ecology and Management* 411:223-233.