

June 2, 2021

Grand Mesa, Uncompahgre and Gunnison National Forests
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Cc: Samantha Staley, Forest Planner
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RE: Grand Mesa, Uncompahgre, and Gunnison National Forests Working Draft of the Revised Land Management Plan (WDRMLP)

Dear Mr. Stewart:

The below undersigned organizations, representing Colorado's hunters and anglers, are writing in support of the [Wild Lands Report](#) and recommendations submitted by Backcountry Hunters and Anglers (BHA) on the WDRMLP, and to highlight additional opportunities to strengthen conservation in the forthcoming Draft Forest Plan. Our members and supporters are thousands of hunters, anglers, wildlife viewers and others who care deeply about wildlife conservation and backcountry habitats in Colorado. We understand that active forest management is important for habitat resiliency, wildlife and other forest values, and believe that the approach we outline below would not affect the abilities of the USFS to implement this important work.

Hunting, angling, and wildlife viewing contribute over \$5 billion annually to Colorado's economy.¹ This economic contribution is sustainable only if we maintain Colorado's robust wildlife and fishery populations and the related recreation opportunities they provide. The GMUG planning area accounts for approximately 50,000 big game hunting licenses annually, and supports nearly 20 percent of the state's iconic mule deer and elk populations.² This disproportionately large percentage of the state's big game populations in the GMUG planning area highlights the importance of the plan revision to wildlife and wildlife-related recreation opportunities in Colorado. The planning area also contains an estimated 3,657 miles of perennial streams and rivers, and 1,390 miles of intermittent streams that provide biologically, economically, and recreationally important native and sport fisheries.

Our organizations recognize the efforts by GMUG planning staff to address our previous comments and those of other stakeholders. We greatly appreciate GMUG planning staff's incorporation of Management Area Direction for Wildlife Management Areas (WMAs) into the WDRMLP. The WMA designations and route density Standard associated with them are consistent with Colorado Parks and Wildlife (CPW) recommendations for the highest priority big game habitats, and will help to sustain wildlife populations on the GMUG and

¹ 2019 Colorado Statewide Comprehensive Outdoor Recreation Plan. Appendix F: 2017 Economic Contributions of Outdoor Recreation in Colorado. Colorado Division of Parks and Wildlife. 162pp.
<https://cpw.state.co.us/Documents/Trails/SCORP/Final-Plan/2019-SCORP-Report.pdf>

² Colorado Parks and Wildlife Scoping Comments on the Grand Mesa, Uncompahgre and Gunnison National Forests Plan Revision. June 1, 2018.

wildlife-related recreation opportunities into the future. In addition to the recommendations provided by BHA in their [Wild Lands Report](#), we have highlighted below additional comments for you to consider as you prepare the Draft Forest Plan.

Chapter 2. Forestwide Direction

Socio Economics

Recommended Modifications to Existing Plan Components

FW-DC-SCEC-01: Wildlife and fisheries are not mentioned as contributing to the social and economic well-being of local communities in FW-DC-SCEC-01. Given the disproportionate size of big-game populations in the GMUG planning area, the quality of the native and sport fisheries, and their economic importance to both local communities and the state of Colorado, please provide a clear reference to wildlife and fisheries, and sustainable hunting and angling opportunities and related employment in FW-DC-SCEC-01.

Connectivity

Recommended New Plan Components

The recently signed Colorado/USFS Shared Stewardship Agreement requires “coordinating with local, state, and federal land managers across administrative boundaries - on a landscape-level to maintain, protect, and enhance wildlife corridors and habitat connectivity.”³ In addition, the USFS 2012 Planning Rule contains specific provisions directing the USFS to incorporate habitat connectivity, landscape scale habitat restoration, and the habitat needs of species used by the public for hunting.⁴

On August 21, 2019, Colorado Governor Jared Polis signed [Executive Order D 2019-011 Conserving Colorado's Big Game Winter Range and Migration Corridors](#) (EO). Consistent with this EO, in 2020 Colorado Parks and Wildlife (CPW) updated its [Recommendations to Avoid and Minimize Impacts to Wildlife from Land Use Development in Colorado](#) based on the best available science. These updated CPW recommendations specify a 1 linear mile per square mile route density limit in migration corridors and the highest priority big game habitats in order to maintain habitat connectivity and function across the landscape. Also consistent with the EO, in 2020 the Colorado Oil and Gas Conservation Commission adopted CPW's recommendations, including the 1 linear mile per square mile route density limits in the highest priority big game habitats, as part of the SB 19-181 updates to their oil and gas regulations. Finally, in March 2021, CPW released its revised [draft Colorado Guide to Planning Trails with Wildlife in Mind](#). This document also recommends a route density limit of 1 linear mile per square mile in migration corridors and the highest priority big game habitats in order to maintain habitat connectivity and function.

To maintain consistent landscape-level management across public and private administrative boundaries, habitat connectivity across the landscape, and the function of

³ State of Colorado and U.S. Department of Agriculture. 2020. Memorandum of Understanding between the State of Colorado and the U.S. Department of Agriculture titled Improve Shared Stewardship Across All Lands in Colorado through a Collaborative Partnership Between Colorado and USDA Forest Service (Shared Stewardship Strategy). 10 pp.

⁴ 36 CFR Part 219, § 219.8, § 219.10(a)(5)

CPW-mapped high priority big game habitats consistent with state efforts, please incorporate plan components in the **Connectivity** section of the Draft Forest Plan that parallel CPW's recommendations with respect to limiting route density to 1 linear mile per square mile in migration corridors and the highest priority big game habitats.

Native Species Diversity (SPEC)

Recommended New Plan Components

Big Game Species:

- See our recommendations above for **Connectivity**.
- The GMUG staff and CPW should continue to work closely together to ensure that habitat management activities on the forest are consistent with CPW's herd management objectives. Consistent with CPW's August 12, 2019 comments on the WDRLMP (CPW Comments), please add an additional Guideline regarding working collaboratively with CPW to achieve big game populations objectives. Please also include an Objective for annually reviewing post-hunt population estimates and herd management plans in order to identify adaptive management needs necessary to provide sustainable harvest that meets or exceeds average big game harvest success rates across Colorado.
- Disturbance in montane-subalpine grasslands and alpine grassland habitats from May through July has the potential to disproportionately impact big game due to the use of these habitats by migratory big game populations for birthing and rearing young. Wildlife researchers in Colorado have documented that unrestrained trail-based recreation in these habitats during the early summer disturbs elk calving and can negatively impact elk calf survival, resulting in negative impacts to elk populations.^{5,6,7} With this in mind, please incorporate a Guideline mirroring FW-GDL-SPEC 26 to provide protections from summer recreational disturbance for big game species using montane-subalpine grasslands and alpine grasslands within CPW-mapped high priority big game habitats.
- Please add a Desired Condition stating that "Suitable habitat will be maintained across the GMUG for big game by providing protection from disturbance (security areas) and suitable forage to maintain populations distributed on forest lands, minimizing the potential for animals to be pushed to adjacent private lands. Forest lands will be managed in collaboration with adjacent land management agencies and private landowners to maintain historical big game migratory patterns and movements across the landscape sufficient to maintain healthy big game populations." This Desired Condition is supported by both CPW Comments and BHA's recommendations.

⁵ <https://www.hcn.org/articles/wildlife-hiking-trails-are-a-path-to-destruction-for-colorado-elk-vail>

⁶ Phillips, G.E and Alldredge, A.W. 2000. Reproductive success of elk following disturbance by humans during calving season. *Journal of Wildlife Management*. 64(2):520-530

⁷ Shively, K.J., A.W. Alldredge, and G.E. Phillips. 2005. Elk reproductive response to removal of calving season disturbance by humans. *Journal of Wildlife Management* 69(3):1073-1080.

- Consistent CPW Comments, please add an additional Objective to evaluate 25 percent of GMUG planning area every 3 years for opportunities to close or re-route system routes to decrease habitat fragmentation and increase security areas for wildlife.
- Consistent with CPW Comments, please add a Guideline to reduce habitat fragmentation during new project proposal reviews by considering travel route closures, co-located routes, and/or re-alignments to create larger contiguous habitat blocks and security areas for wildlife.

At-risk Species:

- Due to small population size and restricted range in the plan area, and due to the ongoing risk of contact with domestic sheep and disease transmission, we strongly support inclusion of Rocky Mountain and Desert Bighorn Sheep as Species of Conservation Concern in the GMUG Forest Plan. Lack of lamb recruitment due to poor lamb survival is a cause of concern for long-term persistence for many of these herds. We appreciate inclusion of FW-STND-SPEC-15 and FW-STND-SPEC-16 to address the risk of disease transmission by maintaining effective separation between domestic sheep and goats and bighorn sheep.

Recommended Modifications to Existing Plan Components

General Species Diversity:

- FW-DC-SPEC-01: Please change “movement” to “daily and seasonal migratory movement.”
- FW-OBJ-SPEC-03: Please incorporate “removal of roads and trails to achieve reduced route density” as means for restoring and enhancing habitat effectiveness per CPW Comments and BHA recommendations.
- FW-GDL-SPEC-06: Please change “roads” to “roads and trails.”

Big Game Species:

- FW-DC-SPEC-14: Due to the interplay between managing for security areas and managing route density, we have made recommended modifications to this Desired Condition below under **Management Area Direction, Wildlife Management Areas**.
- FW-GDL-SPEC-17: As recommended by BHA, please change this Guideline to a Standard. Implementing seasonal timing limitations in these highest priority big game habitats during critical time periods is widely recognized as standard practice for land managers across jurisdictional boundaries.
- FW-GDL-SPEC-18: In addition to patch size, a critical and necessary component for defining functional security habitat for elk is the distance from the nearest road or

trail that may displace elk and impact habitat use.⁸ Please add a second sentence to this Guideline to address the known observed displacement distances for elk from motorized and non-motorized routes⁹: “Security patches should be greater than 1000m from the nearest motorized route and greater than 660m from the nearest non-motorized route (excluding administrative access only routes).”

At-risk Species, Gunnison Sage-Grouse (Federally Threatened)

- FW-GDL-SPEC-34: Please change the lek disturbance buffer from 0.6 to 1.0 mile to reflect recent changes to CPW recommendations and COGCC regulations for Gunnison sage-grouse.

Transportation

Recommended New Plan Components

- See *Big Game* above - Consistent CPW Comments, please add an additional Objective to evaluate 25 percent of GMUG planning area every 3 years for opportunities to close or re-route system routes to decrease habitat fragmentation and increase security areas for wildlife; please add a Guideline to reduce habitat fragmentation during new project proposal reviews by considering travel route closures, co-located routes, and/or re-alignments to create larger contiguous habitat blocks and security areas for wildlife.

Range

Recommended New Plan Components

- Consistent with CPW Comments, please incorporate an additional Guideline to follow the management recommendations to land management agencies from The Western Association of Fish and Wildlife Agencies [*Recommendations for Domestic Sheep and Goat Management in Wildlife Sheep Habitat*](#) (2012).

Recreation

Recommended New Plan Components

- Please add a Standard in the Recreation section complimentary to Wildlife Management Area (WMA) Standard MA-STND-WLDF-02 requiring that the Recreation Opportunity Spectrum (ROS) for WMAs be maintained as “Primitive” or “Semi-Primitive” with route density limits of 1 linear mile per square mile.

⁸ Hillis, J. M., M. J. Thompson, J. E. Canfield, L. J. Lyon, and T. N. Lonner. 1991. Defining elk security: The Hillis paradigm. In Proceedings elk vulnerability symposium, eds. A. G. Christensen, L. J. Lyon, and T. N. Lonner, 38-43. Bozeman, Montana: Montana State University.

⁹ Wisdom, M. J., H. K. Preisler, L.M. Naylor, R.G. Anthony, B.K. Johnson, M.M. Rowland. 2018. Elk response to trail-based recreation on public forests. *Forest Ecology and Management* 411 (2018) 223-233. <https://doi.org/10.1016/j.foreco.2018.01.032>

- To maintain the function of CPW-mapped high priority big game habitats consistent with state efforts across the landscape and public/private administrative boundaries, please incorporate a Standard requiring that the ROS for the highest priority big game habitats be maintained as “Primitive” or “Semi-Primitive” with route density limits of 1 linear mile per square mile.
- Colorado Roadless Areas are defined by rule as having Primitive or Semi-primitive non-motorized and motorized forms of dispersed recreation.¹⁰ It is important to note that high motorized and non-motorized trail densities may impair the other characteristics that define Colorado Roadless Areas, including the diversity of plant and animal communities, and providing functional habitat for species dependent on large, undisturbed areas of land.¹¹ With this in mind, please incorporate a standard reflecting that the ROS for Colorado Roadless Areas need to be maintained as “Primitive” or “Semi-Primitive,” and a Guideline to reflect that trail densities should be limited or reduced to the extent necessary to maintain the other characteristics that define Colorado Roadless Areas. This is particularly noteworthy where Colorado Roadless Areas overlap with WMAs and CPW-mapped high priority big game habitats and route densities should not exceed 1 linear mile per square mile.
- Per BHAs recommendations, please incorporate a Guideline to concentrate new trail development close to communities where trail and road densities are already high, promoting retention and enhancement of blocks of intact landscapes and high-quality wildlife habitat.

Recommended Modifications to Existing Plan Components

- FW-GDL-REC-10: Please see CPW Comments. Add to *Exceptions*: “Where the desired ROS conflicts with specific Plan Components outlined in Chapter 2, Maintain Ecological Sustainability, or specific Management Area Direction Plan Components outlined in Chapter 3.”

Chapter 3. Management Area Direction

Colorado Roadless Areas

Recommended New Plan Components

- See Recreation comment above regarding adding Plan Components to limit or reduce trail densities as needed in Colorado Roadless Areas to maintain the roadless area characteristics defined by 36 CFR § 294.41.

Wildlife Management Areas

We strongly support the implementation of WMAs in the GMUG planning area as recommended by CPW with the additions recommended by BHA in their [Wild Lands Report](#). In addition, there are several WMAs recommended by CPW that were included in the

¹⁰ 36 CFR § 294.41

¹¹ 36 CFR § 294.41

WDRMLP that we would like to highlight due to their importance to wildlife and fisheries in and around the Gunnison Basin, including:

- Soap Creek Corridor
- Flat Top West and Flat Top East Corridors
- Carbon Creek and Red Mountain Corridors
- Almont Triangle Corridor
- Signal Peak Critical Sagebrush
- Forest Hill Montane
- Sanford Montane
- Dawson Gulch

These WMAs (except Dawson Gulch) were proposed as “primary” by CPW over other potential WMAs. Several are identified specifically for their use as wildlife corridors to maintain migration and promote habitat connectivity across the landscape. Recent CPW data suggests that Dawson Gulch is an important migratory area and should also be considered as a primary WMA. We strongly encourage you to include these areas as WMAs in the Draft Forest Plan along with those proposed by BHA in their [Wild Lands Report](#). These focused management areas will help conserve the diversity of wildlife across the GMUG, and sustain the robust economic benefits that wildlife-related recreation provides to counties, local communities, and the state of Colorado.

We appreciate the robust plan components proposed in the WDRMLP for WMAs and wildlife habitat forestwide. To coordinate the need to maintain large blocks of security habitat well distributed across the forest in order to maintain free-ranging wildlife populations on public lands, while specifically limiting the densities of routes in the most sensitive wildlife habitats to maintain habitat function, we offer the following modifications to the existing plan components.

Recommended New Plan Components

- See CPW Comments. Please add an additional Guideline for WMAs: “Management of WMAs identified as having migration corridors and other CPW-mapped high priority habitats should incorporate specific management actions that maintain connectivity and provide consistent management with adjacent landowners for neighboring seasonal wildlife habitats (i.e., seasonal closures for elk summer or winter range, etc.).” See also our comments under **Connectivity**.

Recommended Modifications to Existing Plan Components

The modifications to MA-STND-WLDF-02 and FW-DC-SPEC-14 described below work together with the plan components suggested above, including FW-GDL-SPEC-18, to maintain habitat function in WMAs and high priority seasonal habitats while providing the desired blocks of security habitat forestwide.

- **MA-STND-WLDF-02:** To maintain habitat function for wildlife species by minimizing impacts associated with roads and trails, there shall be no net gain in system routes, both motorized and nonmotorized, where the system route density already exceeds 1 linear mile per square mile within the Wildlife Management Area (WMA) boundary.

Additions of new system routes within WMAs shall not cause the route density in a proposed project's zone of influence (1000m for motorized routes and 660m for non-motorized routes)¹² to exceed 1 linear mile per square mile. Within the Flattop Wildlife Management Areas on the Gunnison Ranger District, there shall be no new routes. Exception: this does not apply to administrative routes.

- **FW-DC-SPEC-14:** Habitat blocks of sufficient size and quality exist well-distributed across the landscape to support wildlife populations. Travel routes provide necessary access while maintaining undisturbed high-quality habitat blocks greater than 1000m from open motorized system routes and 660m from open non-motorized system routes. These habitat blocks are of sufficient size to function as essential security areas for populations of big game and other species.¹³ Functional migration and movement corridors exist across the landscape that provide connectivity to allow for relatively unabated movement of big game and other species. See also Chapter 3, Wildlife Management Area section, Ecosystems FW-DC-ECO-06, and Native Species Diversity FW-OBJ-SPEC-03 and FW-GDL-SPEC-18.

Conclusion

Our members appreciate the efforts by GMUG staff to share information and solicit input from stakeholders on the WDRLMP. Thank you for this opportunity to provide input prior to release of the Draft Forest Plan, and for your ongoing efforts to conserve backcountry habitats, wildlife and fisheries, and wildlife-related recreation on the GMUG. Please to not hesitate to contact me at (970) 759-9588 if you have any questions about the content of this letter.

Respectfully,



Jon Holst
Colorado Field Representative
Theodore Roosevelt Conservation Partnership

Suzanne O'Neill
Executive Director
Colorado Wildlife Federation

Patt Dorsey
Director of Conservation Operations, West Region
National Wild Turkey Federation

Scott Hampel
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Muley Fanatic Foundation

Dan Gates, Chairman
Coloradans for Responsible Wildlife Management &
Colorado Trappers and Predator Hunters Association

Scott Willoughby
Angler Conservation Program
Colorado Coordinator
Trout Unlimited

¹² Wisdom et al. 2018. See footnote 9.

¹³ Security areas should be a minimum of 250 acres in size (see Hillis et al. 1991), but may need to be much larger for hunted populations during hunting seasons. See Ranglack, D. H., K. M. Proffitt, J. E. Canfield, J. A. Gude, J. Rotella, and R. A. Garrott. 2017. Security areas for elk during archery and rifle hunting seasons. *Journal of Wildlife Management* 81:778-791.