



June 14, 2021

USDA Forest Service
Rocky Mountain Regional Office
Steamboat Improvements Project
Attn: Objection Reviewing Officer
P.O. Box 18980
Golden, CO 80402
Submitted via email:
SM.FS.r02admin-rev@usda.gov

Re: Steamboat Improvements Project #58336

Dear Objection Reviewing Officer and Mr. Russel Bacon,

Thank you for the opportunity to submit the objection below to the environmental assessment (EA), finding of no significant impact (FONSI), and draft decision notice (DN) for the *Steamboat Resort (Steamboat) Improvements* project, Project #58336.

This project is in the Medicine Bow-Routt National Forests & Thunder Basin National Grassland. The Forest Supervisor is Russel Bacon.

Keep Routt Wild has reviewed the EA, FONSI, and draft decision. We have found the draft EA deeply flawed with respect to evaluation of impacts to elk, elk habitat, elk habitat effectiveness, and the cumulative effects of those impacts. We are eligible to object because the content of our previous comments specifically mentioned the issues of elk, elk habitat, and related cumulative impacts.

The flaws are:

1. The EA measures the significance of impact to elk at the scale of the E2 DAU, an area that spans two counties, yet the EA includes no other impacts in those two counties outside of those in the Steamboat SUP when judging cumulative impacts.
2. The only scale of evaluation for elk mentioned in the 1998 Routt National Forest Land and Resource Management Plan is at the Geographic Area level, which would be the Middle Yampa Geographic Area (MYGA). Page 13, item #10:
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5166022.pdf

It states, “In forested ecosystems, maintain habitat effectiveness for deer and elk at 50% or greater, as measured at the Geographic Area scale.” Yet, there was no evaluation done at this scale in the EA, nor was the Middle Yampa Geographical Area mentioned at all. Instead, the evaluation was done at the E2 DAU scale.

3. When evaluating at the Geographic Area scale, there is a possibility of significant impact, particularly with other past, current, and proposed projects in the geographic area scale. In particular:
 - a. Cumulative effects include past and foreseeable future projects in the MYGA. Past projects include the Buffalo Pass Trails Project (which is Phase 1 of a Referendum 2A trails development initiative), Mad Rabbit Trails Project (Phase 2), and the Buffalo Pass Road Improvement Project. These were not included in the cumulative effects portions of the EA.
 - b. There is compelling evidence that development in the MYGA is already impacting elk and elk habitat. There is considerable overlap with CPW-designated GMU 14 (Game Management Unit 14) and the MYGA. CPW has measured a significant decline in the calf/cow ratio in this GMU, from 0.52 in 2006 to 0.37 in 2019. (See attached diagram from CPW after signature of objection letter). This decline contributes to a parallel overall decline of the calf/cow ratio of the E2 DAU.
 - c. The EA states that “During the summer, ample habitat exists on the MBRTB for elk that may become displaced from the fringe of the mapped summer concentration area.” (pg. 37). This is asserted without evidence. Indeed, the E2 DAU Plan population objective (mentioned in the EA, pg. 32) implies the opposite, arguing that the 25% population reduction objective is “consistent with recent sustainable herd estimates produced from the HPP habitat model.” (E2 DAU Plan, page 12). If the reduced elk herd population objective is driven by constrained habitat, there simply is not ample or excess habitat when more disturbance is added.
 - d. Limited summer range is consistent with the declining calf/cow ratios and the E2 DAU population objective. Limited fat stores for elk leading into winter lead to a lower survival rates for both cows and calves.
 - e. At a recent Bud Werner Library event in Steamboat Springs, wildlife biologist Paul Millhouser [presented his findings](#) that human encroachment, specifically into summer range, was a key factor in the steeply declining elk herds in the Eagle and Roaring Fork valleys. This is the most comprehensive study of the cause of the declining elk herds around Vail, and emphasizes the importance of summer range. “By about 2000, the winter habitat was about as fragmented as it could be,” [Millhouser said](#). “At this point, the development started turning into areas that were traditionally summer habitat. When the elk already weren’t getting the winter habitat they need, that summer habitat becomes more critical because if they can’t

feed well in the winter, they sure as heck better bulk up during the summer and fall or they're going to be out of luck."

To remedy this, the EA needs to incorporate a cumulative effect analysis on elk, elk habitat, and elk habitat effectiveness that incorporate all past, current, and foreseeable activities in the Middle Yampa Geographical Area.

Thank you for your attention to this issue.

Yours sincerely,
Keep Routt Wild

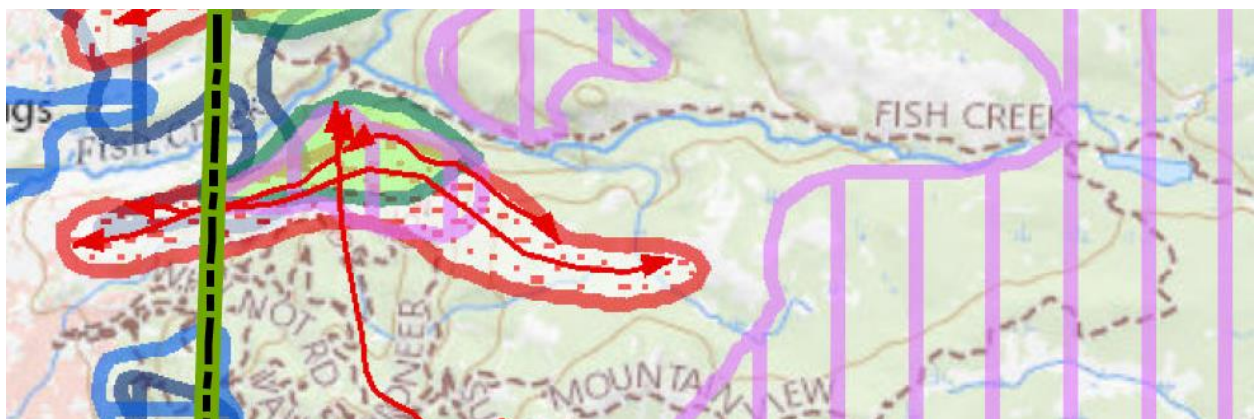
Larry Desjardin
President of the Board

Keep Routt Wild
1815 Central Park Drive
Suite 110 PMB 156
Steamboat Springs, CO 80487
keeprouttwild@gmail.com

Supporting information:

Fish Creek Area

CPW data (see figure below) shows the area as an elk migration corridor (red), an elk production area (shaded green), and elk summer range (vertical purple).



In 2019, the Mad Rabbit pre-scoping shows a location of the trail to the east end of the ski area expansion (Trail #5). Not only does this created a connected action, but the Mad Rabbit Trails Project represents a significant cumulative impact to the MYGA:



On Wednesday, June 24, 2020, CPW held a virtual meeting discussing the proposal: “Should Game Management Unit (GMU) 14 be Converted From Over-the-Counter (OTC) Licensing to a Limited License Unit for Archery Elk Hunting?”

In their presentation, CPW presented the following chart showing the declining calf/cow ratios in GMU14 and E2 DAU as a whole:

