

To: GMUG Forest Plan Revision Team
From: Bob Goettge and Kathy Norgard
Date: November 26, 2021
Subject: Comments on the Draft Revised Land Management Plan

We greatly appreciate the expertise and hard work that has resulted in the Draft Revised Land Management Plan.

Thank you for considering our comments below.

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Comment 1:
Reference: Draft Revised Land Management Plan, Page 95

Table 21. Special management area management prescriptions for alternative D (Page 95)

This section currently requires that **additional** trails would be appropriate, subject to site-specific, environmental analysis.

We agree but the requirement for environment analyses must be extended to cover (a) **realignment** and (b) **rerouting** of existing trails which lie in Alt D's SMAs.

Our suggested extension of the current requirement is supported by Table 35, Forest Plan Objectives, which mentions that **realignment** of trails can impact wildlife habitat and connectivity. GMUG recognizes that **realignment** of trails can impact wildlife just as additional trails can. **Rerouting** of trails can also impact wildlife habitat and connectivity.

We ask the Forest Service to change the statement:

“Within motorized and mechanized suitability columns, “limited new” indicates that specific additional trails would, subject to site-specific, subsequent environmental analysis and decisions, be appropriate”,

To:

“Within motorized and mechanized suitability columns, “limited new” indicates that specific additional, **realigned, and rerouted** trails would, subject to site-specific, subsequent environmental analysis and decisions, be appropriate”

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Comment 2

Environment Analysis for trails in Wildlife Management Areas (WMAs) in Alternatives B and D

We suggest the same environmental analysis requirement in Comment 1 for SMAs be applied for trails in Wildlife Management Areas (WMAs) located in Alternative B and Alternative D, to wit:

“Additional, realigned, and rerouted motorized and mechanized trails in WMAs in Alternatives B and D would be appropriate, subject to site-specific, subsequent environmental analysis and decisions.”

We note that the CPW comment of November 22, 2021 notes the “Recent discovery of one of the largest (75 miles long) and unique (crosses the continental divide) ungulate migration corridors currently identified in Colorado, referred to as the East Gunnison Basin Ungulate Corridor (EGBUC).” The discovery of the EGBUC gives greater urgency to our suggested broader requirements for environment analysis of trails in both Alt B and Alt D.

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Comment 3

Reference:

Wildlife Management Area – MA 3.2 (WLDF)

Desired Conditions

Standards

MA-STND-WLDF-02:

The draft revision states:

“To maintain habitat function and provide security habitat for wildlife species by minimizing impacts associated with roads and trails, there shall be no net gain in system routes, both motorized and non-motorized, where the system route density already exceeds 1 linear mile per square mile, within a wildlife management area boundary.

Additions of new system routes within wildlife management areas shall not cause the route density in a proposed project’s zone of influence to exceed 1 linear mile per square mile.”

We agree with intent and structure of these requirements. However considering the urgency for additional protection of wildlife from the impacts of backcountry trail-based recreation, more stringent limits are needed.

Thus, we fully support the version recommended by The Pew Charitable Trusts contained in its comment of November 15, 2021 repeated below.

“MA-STND-WLDF-02

“To maintain habitat function and provide security habitat for wildlife species by minimizing impacts associated with roads and trails, there shall be no net gain in system routes, both motorized and non-motorized, within a wildlife management area boundary. Where route density exceeds 0.6 linear mile per square mile, existing routes will be identified for decommissioning in order to achieve this density ceiling. “