

November 23, 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 (GMUG) Draft Revised Land Management Plan (DRLMP)

Dear Mr. Stewart:

The below undersigned organizations, representing Colorado's hunters and anglers, are writing to highlight additional opportunities to strengthen conservation in the forthcoming Final 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. 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.

We greatly appreciate GMUG planning staff's incorporation of Colorado Parks and Wildlife's (CPW) recommended Management Area Direction for Wildlife Management Areas (WMAs) into the Draft Revised Land Management Plan (DRLMP) Alternative B, and we also appreciate the consideration and incorporation of additional WMAs identified by Backcountry Hunters & Anglers in their [Wild Lands and Wildlife Report](#). We understand that active forest management is important to address the risk of catastrophic wildfire, to continually improve habitat conditions for wildlife, and to manage for habitat resiliency and forest health in the face of a changing climate. We believe that the designation of WMAs and the associated plan components in Alternative B will provide the flexibility for the USFS to implement this important work while maintaining habitat connectivity 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.

increasing conservation of the most important wildlife habitats across the forest. We note that providing this management flexibility requires that the USFS also identify clear vegetation management criteria for WMAs in the Final Forest Plan to make certain that vegetation management in these areas is designed primarily to improve conditions for wildlife.

Our organizations also recognize the outstanding collaborative efforts by GMUG planning staff to address our previous comments and those of other stakeholders.³ We offer the following recommendations to build upon this existing collaboration and to strengthen conservation in the Final GMUG Forest Plan. This letter is organized in five parts: 1) Plan Components Recommendations, 2) Species of Conservation Concern Recommendations, 3) Recommended Additions/Modifications to Geographic Area Designations, 4) Monitoring Recommendations, and 5) Recommended Clarifications.

1) Plan Component Recommendations

Chapter 2. Forestwide Direction

Key Ecosystem Characteristics (ECO)

Connectivity. 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.”⁴ 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.⁵

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 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, as part of the SB 19-181 updates to their oil and gas regulations. Finally, in March 2021, CPW released its [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.

The WMA designations in the DRLMP and route density Standard associated with them (MA-STND-WLDF-02) are supported by Colorado Parks and Wildlife (CPW) recommendations for the highest

³ See sporting groups comments dated June 2, 2021.

⁴ 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.

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

priority big game habitats and provide a strong foundation to maintain habitat connectivity across the GMUG. While the majority of CPW's mapped high priority big game habitats fall within WMAs identified in the DRLMP, there are some areas of mapped high priority habitats outside of WMAs that still need the protection provided by MA-STND-WLDF-02.

- **New forestwide Standard to maintain connectivity in high priority big game habitats.** To maintain consistent landscape-level management prescriptions across public and private administrative boundaries, and fully maintain habitat connectivity and the function of CPW-mapped high priority big game habitats located outside of WMAs consistent with state efforts, please incorporate a forestwide Standard that parallels MA-STND-WLDF-02 and CPW's recommendations with respect to limiting route density to 1 linear mile per square mile in mapped migration corridors and the highest priority big game habitats mapped by CPW.⁶
- **New forestwide Guideline for maintaining wildlife security areas and habitat connectivity during vegetation management.** Please add a new Forestwide Guideline stating that "Vegetation management activities are designed to achieve the seral and structural stage distribution identified in Table 1 while retaining wildlife security areas and habitat connectivity across the landscape. See also Big Game FW-GDL-SPEC-12, Lynx STND-SPEC-35a (VEG S7) and Management Approaches for Canada Lynx."
- **Modification to FW-DC-ECO-05: Connectivity.** In addition to referencing forestwide Desired Condition for Native Species Diversity FW-DC-SPEC-01 and FW-OBJ-SPEC-03, please also include a reference to FW-GDL-SPEC-12 and FW-DC-SPEC-32.

Riparian Management Zones and Groundwater-Dependent Ecosystems (RMGD)

With more water-related special uses than any other national forest, the GMUG serves as critical headwaters. Protecting and sustaining watersheds in the GMUG provides a high-quality, local source of 1.9 million acre-feet of water that is consumed by the populations of western Colorado and the southwestern United States. These watersheds and their headwaters also sustain the region's ecosystems and wildlife habitats. The Desired Conditions for Riparian Zones in the DRLMP contain laudable goals, but require stronger Objectives to be meaningful, especially for streams. We recommend the following modifications:

- **Modification to FW-OBJ-RMGD-06:** The suggested 10-year objective of 2,500 acres of riparian or meadow habitat amounts to only 250 acres per year, and the 10-year stream objective of 15 miles equates to just 1.5 miles per year. While we recognize the staffing and funding constraints of the Forest Service, we believe there is an urgent need to increase the rate of restoration and enhancement of these habitats. We recommend that the Objective for riparian zones be 200-foot total width listed in linear miles with an annual objective of 15 miles per year, and that a separate Objective be included for riparian-related meadow acres. In addition, we recommend that the 10-year stream Objective be at least 10 miles per year for restoration of hydrologic function.

⁶ https://cpw.state.co.us/Documents/Conservation-Resources/Energy-Mining/CPW_HPH-Map-Layers.pdf

- **Modification to FW-GDL-RMGD-15:** Recommended additions underlined in italics: “To maintain ecosystem diversity and function, design projects, *especially roads and trails*, to avoid or mitigate negative impacts to the ecological services that groundwater dependent ecosystems provide.”

Aquatic Ecosystems (AQTC)

- **New forestwide Objective to identify areas critical for the maintenance and expansion of non-native recreational fisheries. FW-OBJ-AQTC-03** recognizes the need to conserve and expand native aquatic and semi-aquatic species. Please incorporate an additional Objective that reflects the importance of identifying, maintaining, and expanding non-native recreational fisheries and the economic benefits they provide to local communities and the State of Colorado.
- **Modification to FW-STND-AQTC-05:** Recommended changes underlined in italics: “New, replacement, and reconstructed crossings (culverts, bridges, and other stream crossings) and in-stream structures (impoundments, diversions, and weirs) on perennial streams and on intermittent streams known to be used *by native fishes (bluehead sucker and flannelmouth sucker)* for spawning, will accommodate flood flows and allow aquatic organism passage, unless the accommodation would increase non-native species encroachment on native fish and amphibian habitat. Exceptions include temporary structures in place for less than one year. See also the Forestwide guideline for connectivity, SPEC-06.
- **Modification to FW-GDL-AQTC-07:** Recommended additions underlined in italics: “To maintain stream channel stability and aquatic habitat, large wood should not be cut and/or removed from stream channels. *Projects adjacent to streams, especially trails, should follow the guidance of FW-GDL-RMGD-15.* **Exception:** wood threatens critical infrastructure and/or public and recreational boater safety (e.g., mid-channel bridge piers).”

Fire and Fuels Management (FFM)

- **Modification to FW-GDL-FFM-03:** Recommended additions underlined in italics: “See also management area direction for recreation emphasis corridors, EMREC-01 and 07, *and MA-GDL-WLDF-XX (see below) for Wildlife Management Areas*, regarding the role of vegetation management in these locations.”

Native Species Diversity (SPEC)

- **New forestwide Guideline to work collaboratively with CPW to maintain habitat conditions consistent with big game population objectives.** 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.

- **New forestwide Objective to annually review CPW’s big game population monitoring data.** Please also include an Objective to annually review CPW 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.
- **New forestwide Guideline to manage disturbance to big game in alpine habitats.** 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, and the relative openness and lack of security areas associated with these habitats. 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.^{7,8,9} With this in mind, please incorporate a Guideline mirroring FW-GDL-SPEC 19 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.
- **New forestwide Guideline to utilize seasonal area and route closures within high priority big game habitats to mitigate seasonal impacts where necessary to maintain habitat function.** In addition to site-specific timing limitations on new activities (FW-GDL-SPEC-15), area closures are sometimes needed to maintain habitat function where dispersed activities are widespread or travel management has not been completed. Seasonal area and route closures could be applied to all summer and winter motorized and mechanized use but may include other uses as determined by site specific conditions.
- **New forestwide Guideline for maintaining Primitive or Semi-Primitive ROS in the highest priority big game habitats identified by CPW.** 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.
- **Modification to FW-DC-SPEC-01:** Recommended changes underlined in italics: “Forest management provides for *daily and seasonal migratory movements for* native species ~~movement~~ within and among National Forest System parcels as well as adjacent lands in the broader landscape. Disturbance of species by management activities and recreation is managed to minimize impacts during critical life history periods (breeding, feeding, *migrating*, and rearing young), contributing to the persistence of the species. Ecological conditions sustain common and uncommon native species. See also the forestwide desired condition for the connectivity of ecosystems ~~ECO-06/ECO-05~~ for related habitat direction that applies to all native species, *and FW-GDL-SPEC-12 for big game.*”

⁷ <https://www.hcn.org/articles/wildlife-hiking-trails-are-a-path-to-destruction-for-colorado-elk-vail>

⁸ 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

⁹ 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.

- **Modification to FW-DC-SPEC-02:** Recommended changes underlined in italics: “Forage *production and* availability is maintained or increased, where capable, and contributes to ecosystem resiliency and forage for nongame species, livestock, and big game. *See also FW-DC-RNG-01.*”
- **Modification to FW-Obj-SPEC-03:** Recommended changes underlined in italics: “During each ~~10~~-7-year period following plan approval, restore or enhance at least 20,000 acres of habitat. Of acres treated, 30 percent should be conducted in Grand Mesa, Uncompahgre, and Gunnison National Forests ~~Draft~~ Revised Land Management Plan wildlife management areas (MA 3.2), while other priority treatment areas should include (but are not limited to) aspen, riparian areas, ecotones, winter range in pinyon-juniper communities, connectivity areas, and designated critical habitat. Actions to help accomplish this objective may include:
 - improving wildlife movement or habitat connectivity by *modifying or* removing unneeded structures,
 - eliminating redundant routes, converting mode of travel for specific routes, or realigning routes into less impactful settings,
 - *utilizing seasonal area or route closures within CPW-identified high priority big game habitats,*
 - implementing vegetation management practices that maintain or enhance connectivity,
 - retrofitting or designing new structures (e.g., building new or converting existing fences to wildlife-friendly fence specifications such as a lay-down fence), and
 - improving aquatic and riparian resources (e.g., remove barriers, restore dewatered stream segments, connect fragmented habitat, provide organism passage, etc.), etc.

See also the desired condition for wildlife management areas, MA-DC-WLDF-01.

- **Modification to FW-DC-SPEC-12:** We appreciate the USFS recognizing the need to maintain security areas for big game to maintain big game populations. To fully incorporate the evaluation of security areas during project-level planning, we strongly recommended changing this Desired Condition to a Guideline, and explicitly incorporating into the language of the Guideline the 250-acre minimum patch size used for the security area analyses in the Environmental Impact Statement (EIS), Vol 1, p.225.^{10,11} A suggested reformatting of this plan component to include the 250-acre minimum patch size follows with recommended changes underlined in italics:

FW-~~DC~~DL-SPEC-12: Habitat blocks of sufficient size and quality exist *well-distributed* across the landscape to support *CPW* wildlife *population objectives*. Travel routes provide necessary access while maintaining relatively undisturbed high-quality habitat

¹⁰ 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.

¹¹ 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.

blocks—greater than 250 acres in size and a least 0.62 mile (1,000 m) from open motorized system routes and 0.41 mile (660 m) from open non-motorized system routes—~~sufficient in size~~ to provide necessary security areas for populations of big game and other species. Relatively undisturbed migration and movement corridors exist across the landscape that provide sufficient security and habitat quality to allow for relatively unabated movement of big game and other species. See also chapter 3, Wildlife Management Area section; the forestwide Desired Conditions for ecosystem connectivity ~~ECO-06~~ECO-05 and for range RNG-01; and the forestwide Objective for native species diversity SPEC-03.

- **Modification to FW-STND-SPEC 13:** For this Standard to be implemented effectively, it is imperative to define the extent of spatial and temporal separation needed for “effective separation” and to outline the methods that will be used to achieve the Standard. We recommend working with CPW to specifically define the spatial and temporal separation needed for effective separation. At a minimum, spatial separation should incorporate the best available science to estimate bighorn core herd home ranges and movements across the landscape in relation to domestic sheep allotments and incorporate a risk-of-contact analysis using a clearly defined level of risk agreed upon by CPW. Temporal separation should be defined as no physical geographic overlap between domestic sheep and bighorn overall range with a time buffer agreeable to CPW and consistent with the Western Association of Fish and Wildlife Agency (WAFWA) recommendations. This Standard should also identify when the analysis of effective separation/risk-of-contact will be completed. We recommend it be completed: 1) during Forest Plan revision and amendments, 2) during review of new or renewing domestic sheep/goat grazing permits, 3) for site-specific changed allotment conditions or documented herd distribution changes that indicate a potential increased risk-of-contact, and 4) in areas where risk has not previously been assessed. At a minimum, Forestwide assessment of risk should be completed every 10 years per the WAFWA [Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat](#).
- **Delete Management Approach GDL-SPEC-13:** Given that many of the bighorn herds on the GMUG have not been categorized as Tier 1 or Tier 2 by CPW due to the lack of approved herd management plans, and that CPW has documented the potential for interaction between all herd classifications on the GMUG, prioritizing Tier 1 herds will not ensure population viability of bighorn on the GMUG when disease transmission between all herd classifications is a known threat to viability. We recommend replacing this Management Approach with the modifications recommended for **FW-STND-SPEC 13** and the new plan components recommended for bighorn sheep in SPEC and RNG.
- **New Desired Condition regarding the frequency of disease outbreaks in bighorn sheep herds on the GMUG.** In order to maintain population viability and achieve CPW herd management objectives, we recommend adding a Desired Condition that disease outbreaks associated with contact with domestic sheep occur in bighorn herds at intervals of less than 1 in 50 years.

- **New Management Approach for FW-STND-SPEC 13 to use the most current methods recommended by the Western Association of Fish and Wildlife Agencies (WAFWA)¹² for conducting risk of contact analysis between bighorn sheep and domestic sheep.**
- **Modification to FW-GDL-SPEC-15:** Please change this Guideline to a Standard. Implementing seasonal timing limitations on new activities in these highest priority big game habitats during critical time periods is widely recognized as standard practice for land managers across jurisdictional boundaries in Colorado. In addition, the references for existing recreational use adaptive management thresholds (FW-GDL-REC-07 and -08) pertain only to site-specific impacts from dispersed uses. FW-DC-REC-02 should be included as a reference because it addresses balancing recreation sustainably with other resources, including wildlife.
- **Modification to previous FW-GDL-SPEC-17:** This Guideline was dropped from the previous version of the plan. It read “To improve elk distribution, maintain existing wildlife security areas at no less than 30 percent of a HUC 12 subwatershed (by area).” Since this Guideline contains desirable conditions for providing connectivity across the forest for all species, we suggest converting it to a forestwide Desired Condition that reads “To maintain habitat connectivity for all species and to promote desirable elk distribution, maintain existing habitat blocks that provide wildlife security at approximately 30 percent of each HUC 12 subwatershed (by area). See also FW-GDL-SPEC-12.”
- **Modification to FW-DC-SPEC-19:** Please change this Guideline to a Standard. Requiring motorized or non-motorized, foot, or pack stock traffic to remain on designated routes or to be seasonally limited in specific areas identified by the Forest Service to conserve at-risk species should be a Standard rather than a Guideline to aid with compliance and enforcement.
- **Modification to FW-OBJ-SPEC-38:** In order to strengthen efforts to conserve and recover Gunnison sage grouse, increasing the habitat effectiveness of unoccupied areas otherwise historically suited for grouse needs to be a priority. Please change timing of this Objective to “Within 3 years of plan approval,” and the distance and lek activity requirement to “within 4 miles of any CPW-mapped lek.”
- **New forestwide Standard to limit route density in Gunnison sage grouse occupied habitat.** Please add a Standard that limits route density to 1 linear mile per square mile (640 acres) in occupied habitat consistent with [CPW recommendations for High Priority Habitat](#). Note that to be consistent with the GUSG Recovery Plan, the Forest Service should limit route densities to less than 0.79 linear miles per square mile within 4 miles of surrounding leks.
- **Modification to FW-OBJ-SPEC-54:** The Forest Service, working with its multiple partners on the Colorado River, has already identified key watersheds outside of Wilderness Areas that

¹² Wild Sheep Working Group. 2012. Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat. Western Association of Fish and Wildlife Agencies. 26 pp.

are best suited for native trout restoration and should be able to easily identify where watershed plans are needed to address threats such as degraded habitat, excessive recreational use, etc. While we recognize the staffing and funding constraints of the Forest Service, we recommend increasing the goal for this Objective to completing 3 watershed plans within 5 years of plan approval, and setting implementation goals and a timeline for addressing major threats to target species within each plan. Please also reference **FW-OBJ-RMGD-06**.

- **Modification to FW-STND-SPEC-55:** Please expand this standard to be applicable to all subwatersheds. Due to aquatic species and water quality concerns, ground-based equipment should not be used in subwatershed perennial streams or their riparian management zones unless used for stream or riparian zone habitat restoration or improvement.

Watersheds and Water Resources (WTR)

- **Modification to FW-OBJ-WTR-04:** Given that the life of the Forest Plan may exceed 20 years, and that improving watershed conditions is critical to increasing the resilience of the forest in the face of climate change, we recommend a higher goal than 15 percent. We suggest trending at least 30 percent of subwatersheds towards improved watershed conditions over the life of the Plan. At this pace subwatershed conditions would potentially be improved across the entire forest in ~70 years (versus ~140 years). In addition, we recommend creating a priority list of subwatersheds that need to be restored or enhanced with and implementation schedule for restoration or enhancement that is reviewed annually.

Part III: Ecosystem Services and Multiple Uses of the National Forests

Lands and Special Uses (LSU)

- **New forestwide Desired Condition stating that land exchanges result in net resource and economic benefit to the Forest Service and affected counties.**
- **Modification to Management Approaches:** Please add “Lands containing high priority big game habitats identified by CPW” to the criteria for prioritizing land acquisitions.

Range

- **New forestwide Desired Condition to manage forage conditions to support big game distribution objectives.** Please add a Desired Condition stating that habitat and forage conditions on the GMUG will be managed to maintain existing big game 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, CPW and private landowners to maintain historical big game migratory patterns and movements across the landscape sufficient to maintain healthy big game populations.

- **New forestwide Standard prohibiting the conversion of cattle allotments to sheep allotments within CPW-mapped bighorn sheep habitats.**
- **New forestwide Standard requiring disease transmission risk reduction measures to be incorporated into new and revised allotment management plans and annual operating instructions reflecting those recommended by CPW and WAFWA.**¹³ At a minimum, we recommend that new and revised allotment management plans and annual operating instructions contain provisions:
 - requiring the permittee to report observed contact between domestic sheep/goats and wild bighorn sheep within 24hrs, and
 - requiring the permittee to report within 24 hrs of removing domestic sheep/goats off an allotment - the number of domestic sheep/goats put into an allotment at the beginning of the grazing season and the number of domestic sheep/goats that are removed from the allotment at the end of the season.
- **Modification to FW-DC-RNG-01:** Please include references to FW-GDL-RNG-10, FW-GDL-SPEC-12 and FW-DC-SPEC-36.
- **Modification to FW-OBJ-RNG-03:** Please elaborate on “resource concerns” that will warrant adjustments by incorporating references to FW-DC-RMGD-02 and 03, FW-DC-AQTC-01, FW-STND-RMGD-08 and 09, FW-DC-SPEC-36 and FW-GDL-SPEC-47.
- **Modification to FW-OBJ-RNG-04:** Please incorporate into this Objective or add a new one for modifying multi-wire fences to meet standard designs for safe wildlife passage per [CPW’s Fencing with Wildlife in Mind](#).
- **Modification to FW-STND-RNG-06:** Please incorporate a prohibition against salting or mineral supplementation in CPW-mapped bighorn sheep habitats.

Recreation

- **New forestwide Objective to evaluate opportunities to increase habitat connectivity (decrease habitat fragmentation) during recreation planning.** Consistent with CPW Comments, please add an additional Objective to identify and implement specific actions to increase habitat connectivity/decrease habitat fragmentation during project-level recreation and travel management planning. Reference FW-DC-ECO-05, FW-DC-SPEC-01, FW-OBJ-SPEC-03, FW-GDL-SPEC-12, GW-GDL-SPEC-16, FW-OBJ-SPEC-38, FW-GDL-SPEC-43 and 44, MA-DC-WLDF-01 and MA-STND-WLDF-02.

¹³ Wild Sheep Working Group. 2012. Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat. Western Association of Fish and Wildlife Agencies. 26 pp.

- **New forestwide guideline to reduce impacts of new motorized and non-motorized routes.** Please incorporate an additional Guideline to concentrate new route development where trail and road densities are already high, promoting retention and enhancement of blocks of intact landscapes and high-quality wildlife habitat. Reference FW-DC-ECO-05, FW-DC-SPEC-01, FW-OBJ-SPEC-03, FW-GDL-SPEC-12, GW-GDL-SPEC-16, FW-OBJ-SPEC-38, FW-GDL-SPEC-43 and 44, MA-DC-WLDF-01 and MA-STND-WLDF-02.
- **New forestwide Guideline adopting the principles and methodology described in the [CPW Colorado Guide for Planning Trails with Wildlife in Mind \(2021\)](#).** Please add a new Guideline requiring implementation of CPW's Colorado Guide for Planning Trails with Wildlife in Mind during trail-based recreation and Travel Management planning.
- **New forestwide Standard requiring that electric-assist bicycles stay on motorized routes.** Please add a new standard consistent with Forest Service Policy requiring that all classes of electric-assist bicycles (e-bikes) be authorized only on motorized system routes.
- **Modification to FW-DC-REC-04:** While we appreciate existing budget and staffing constraints, we recommend increasing the goal to 1000 acres in 10 years. Taking indirect impacts from roads and trails into account should make this readily achievable.
- **Modification to FW-OBJ-REC-06:** While we appreciate existing budget and staffing constraints, we recommend increasing the goal to eliminating five unauthorized motorized travel routes within 10 years of plan approval.
- **Modification to FW-GDL-REC-12:** Please change this Guideline to a Standard. Requiring motorized and non-motorized traffic to remain on system routes identified by the Forest Service should be a clear Standard to aid with resource protection, compliance and enforcement.

Trails

- **New forestwide Desired Condition stating** "There is a balance between trail development and use and wildlife habitat conservation and backcountry hunting opportunities."
- **New forestwide Guideline to adhere to the principles and methodology described in the [CPW Colorado Guide for Planning Trails with Wildlife in Mind \(2021\)](#) during project level review for new individual trail proposals and comprehensive Travel Management planning.**
- **Modification to FW-DC-TRLS-01:** Please add "new trail development is concentrated in RMAs and current disturbed landscapes while avoiding WMAs, CO Roadless, and lands with wilderness character to retain habitat capability and provide more primitive recreation opportunities in these areas."

Timber

- **New forestwide Guideline stating:** “Commercial timber sales shall be designed to cooperatively achieve the goals and objectives of the Colorado Forest Action Plan, the GMUG watershed vulnerability assessment, and GMUG and county wildfire Spatial Planning.”

Transportation

- **New Objective to evaluate opportunities to increase habitat connectivity/decrease habitat fragmentation from the transportation system.** Consistent with CPW Comments, please add an additional Objective to evaluate 25 percent of GMUG planning area every 5 years for opportunities to close or re-route system routes to decrease habitat fragmentation and increase security areas for wildlife.
- **Modification to FW-DC-TSTN-01:** Given the widespread use of bicycles for access on all classes of Forest Service system roads and trails (both motorized and non-motorized), please expand this desired condition to address mechanized as well as motorized use as part of the transportation system.

Chapter 3. Management Area Direction

Designated Wilderness (WLDN)

- **New Standard that clearly prohibits motorized and mechanized travel in all Wilderness categories listed in Table 18.**
- **Modification to MA-OBJ-WLDN-07:** Please change “motorized areas” to “summer and winter motorized and mechanized areas.”

Recommended Wilderness (RECWLD)

Modification to Tabeguache and Roubideau Special Management Areas. The description notes that Management within the Tabeguache and Roubideau areas will be consistent with public law (16 U.S. Code 539i, Section 9), so as to maintain the existing wilderness character of the areas. For clarity, please incorporate a summary (bullet points) of those management requirements.

Modification to Fossil Ridge Special Recreation Area The description notes that Management within the Fossil Ridge Special Recreation Area will be consistent with public law (16 U.S. Code 539i, Section 5). It would be very helpful to provide a summary (bullet points) of the management requirements within that law as well.

Colorado Roadless Areas (CRAs)

- **New Guideline for evaluating new trail proposals and recreational uses in CRAs for consistency with the Colorado Roadless Rule.** Prior to approving new trails or recreational

uses in a CRA, existing trail networks and recreational use within the CRA will be evaluated for consistency with the criteria defining roadless characteristics in the Colorado Roadless Rule.¹⁴ New trails, additional snowmobile routes, and other focused route-based recreation within CRAs will not be authorized unless the roadless character of the CRA will be maintained and the CRA will continue to provide semi-primitive and primitive recreation opportunities.

- **New Guideline for limiting route density in CRA's consistent with the Colorado Roadless Rule.** 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.¹⁵ Please add a guideline to reflect that trail densities in Colorado Roadless Areas should be limited or reduced to the extent necessary to maintain the 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.
- **New Standard for maintaining Primitive or Semi-Primitive ROS in Colorado Roadless Areas.** Colorado Roadless Areas are defined by rule as having Primitive or Semi-primitive non-motorized and motorized forms of dispersed recreation.¹⁶ 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."
- **Modification to MA-DC-CRA-01;** recommended changes underlined in italics:

Colorado Roadless Areas encompass large, ~~relatively undeveloped-natural appearing~~ landscapes characterized by ~~high-quality soil, water, and air that provide drinking water, habitat for diverse plant and animal communities,~~ outstanding backcountry recreational experiences ~~and high-quality scenery,~~ and other roadless area characteristics, as defined at 36 CFR 294.41-:

- (1) High quality or undisturbed soil, water, and air;*
- (2) Sources of public drinking water;*
- (3) Diversity of plant and animal communities;*
- (4) Habitat for threatened, endangered, proposed, candidate, and sensitive species, and for those species dependent on large, undisturbed areas of land;*
- (5) Primitive, semi-primitive non-motorized and semi-primitive motorized classes of dispersed recreation;*
- (6) Reference landscapes;*
- (7) Natural-appearing landscapes with high scenic quality;*
- (8) Traditional cultural properties and sacred sites; and*
- (9) Other locally identified unique characteristics.*

Natural processes within the context of the natural range of variation (insects, disease, and fire) occur within Colorado Roadless Areas with minimal human intervention.

¹⁴ 36 CFR § 294.41

¹⁵ 36 CFR § 294.41

¹⁶ 36 CFR § 294.41

Wildlife Management Areas

- **New Objective for reducing route densities in WMAs where necessary to achieve desired habitat connectivity and functional habitat goals.** Please add an Objective to reflect that route densities in some WMAs currently exceed 1 linear mile per square mile, and that while not mandatory, opportunities to reduce route densities in these areas should be evaluated over time to increase habitat function. We recommend evaluating 25% of WMAs exceeding 1 linear mile per square mile every 3 years, and prioritizing WMAs that overlap Colorado Roadless Areas and CPW-mapped high priority big game habitats. See also FW-DC-SPEC-01, FW-DC-ECO-05, FW-OBJ-SPEC-03, FW-GDL-SPEC-16, FW-DC-REC-04, FW-OBJ-REC-06 and MA-DC-WLDF-01.
- **New Guideline for vegetation management activities in WMAs.** We recommend a new Guideline that outlines clear vegetation management criteria for WMAs to ensure that vegetation management in these areas is designed to improve habitat conditions for wildlife. Recommended new Guideline language:

Vegetation management, including timber management projects, fuels treatments, and wildlife treatments within WMAs should be designed specifically to retain or enhance wildlife habitat diversity and connectivity and should maintain or enhance forage production and availability. To accomplish these goals, vegetation management projects in forested portions of WMAs should be designed so that:^{17,18,19,20}

- ~20 percent of the habitat is available hiding cover. Hiding cover is any vegetation capable of hiding 90 percent of a standing elk at 60 m (200ft);
- ~20 percent of the habitat is available as thermal cover. Thermal cover is a Forest stand at least 12 m (40 ft) in height with tree canopy cover of at least 70 percent;
- Wildlife security areas greater than 250 acres in size and at least 0.62 mile (1,000 m) from open motorized system routes and 0.41 mile (660 m) from open non-motorized system routes are retained. Hiding and thermal cover habitats may be equivalent and either or both may provide for wildlife security areas. Hiding and thermal cover combined should comprise ~40% of the landscape.
- ~60 percent of the habitat may consist of openings of 12 to 16 ha (30 to 40 ac) with distances across openings of 365 m (1200 ft) or less; and
- Timber will be left standing along open system routes to provide wildlife security and visual obstruction of open blocks of habitats (clear cuts, meadows, alpine) occurring (or to be made via timber harvest) that are visible from routes. The screening should leave at least 80% of the original visual obstruction measured pre-timber harvest and/or utilize topographic features that reduce the visual distance.

¹⁷ Patton, D. R. 1992. Wildlife habitat relationships in Forested ecosystems. Timber Press, Portland, Oregon, USA.

¹⁸ Patton, D. R. 1997. Wildlife habitat relationships in Forested ecosystems. Revised edition. Timber Press, Portland, Oregon, USA.

¹⁹ Severson, K.E., and A.L. Medina. 1983. Deer and elk management in the Southwest. Journal of Range Management. Monograph. No. 2., Society for Range Management, Denver, CO. 64 p. [2110]

²⁰ Thomas, J.W., and D.E. Toweill, eds. 1982. Elk of North America: Ecology and Management. Wildlife Management Institute. Stackpole Books, Harrisburg, PA.

- **New Standard for maintaining Primitive or Semi-Primitive ROS in WMAs.** Please add a Standard complementary to WMA Standard MA-STND-WLDF-02 requiring that the Recreation Opportunity Spectrum (ROS) for WMAs be maintained as “Primitive” or “Semi-Primitive.”
- **New Standard to address the timing and method to close administrative routes created for vegetation management in WMAs.** Please add a standard that requires closure of temporary administrative routes within 6 months of completion of vegetation management projects. Administrative routes should be closed using on-the-ground actions to physically obstruct public access to those routes and from bypassing the closure points.
- **Modification to MA-DC-WLDF-01;** recommended changes underlined in italics:

Large blocks of diverse habitat are relatively undisturbed by routes, providing security and forage for the life history, distribution, and movement of many species, including big-game species. Habitat connectivity is maintained or improved as fragmentation by routes is reduced. Vegetation management activities occur within WMAs that maintain or enhance wildlife habitat diversity, connectivity, and forage production and availability. See also the Forestwide objective for native species diversity SPEC-03 direction for Connectivity DC-ECO-05, Fire and Fuels Management GDL-FFM-03, Native Species Diversity DC-SPEC-01, DC-SPEC-02, OBJ-SPEC-03, GDL-SPEC-12, GDL-SPEC-16, At-risk Species DC-SPEC-33, OBJ-SPEC-38, GDL-SPEC-45, Range DC-RNG-01, Recreation DC-REC-02, GDL-REC-12, Timber STND-TMBR-03, GDL-TMBR-09, Trails DC-TRLS-01, and Transportation DC-TSTN-01.

Recreation Emphasis Corridors (EMREC)

- **Modification to MA-GDL-EMREC-04:** Please add increased patrolling and compliance enforcement with travel regulations to the list of management controls.

2) Species of Conservation Concern Recommendations

The Forest Service 2012 Planning Rule 36 CFR § 219.9 (c) defines Species of Conservation Concern (SCC) as simply:

“a species, other than federally recognized threatened, endangered, proposed, or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species’ capability to persist over the long-term in the plan area.”²¹

The Forest Service Handbook (FSH) 1909.12, Chapter 10, Sec. 12.52d.3.c. states that the Forest Service should consider for the SCC list “species identified by Federal, State, federally recognized Tribes, or Alaska Native Corporations as a high priority for conservation.”²² The Rocky Mountain bighorn sheep is Colorado’s officially designated state animal, and is listed by CPW as a “Tier 2

²¹ 36 C.F.R. § 219.9 (c) – PLANNING, Subpart A – National Forest System Land Management Planning, *Diversity of plant and animal communities* (2012)

²² FSH 1909, Chapter 10, Section 12.52d.3.c.

Species of Greatest Conservation Need” in the [State Wildlife Action Plan \(2015\)](#) – outlining the threats to this species and demonstrating its high priority for conservation to the state of Colorado.

FSH 1909.12, Chapter 20, Sec. 21.22a.1.d. states that “the Regional Forester has the authority and responsibility to: . . . Leverage expertise of the public and local, State, Tribal, and other Federal natural resource agencies, for identifying species of conservation concern.” On June 28, 2021, CPW communicated to the Forest Service it’s substantial concern about the capability of both Rocky Mountain bighorn sheep and desert bighorn sheep to persist over the long term in the GMUG planning area due to a combination of significant threats, including:

- 1) disease transmission through contact with domestic sheep on and off the GMUG,
- 2) persistent drought and climate change that is impacting general habitat conditions and access to water sources,
- 3) increasingly widespread motorized and non-motorized recreation that further restricts bighorn range by inhibiting recolonization of vacant but otherwise suitable habitats, and
- 4) predation (primarily for desert sheep).²³

In the letter, CPW also documented that although the recent (20+ year) translocation-induced population trend shows a slow rebound, the long-term population trend of bighorn sheep on the GMUG is still negative. For desert bighorn sheep the extremely small population size of approximately 165 individuals on the GMUG leaves them particularly susceptible to disease-related die-offs and predation. Finally, CPW highlighted in its letter the status of geographically isolated sub-populations, the limiting factors associated with these sub-populations, and the restricted range of both species on the GMUG due to adverse habitat conditions (including fire), the juxtaposition of domestic sheep allotments, and expanding recreational and urban development (including highways and increasing traffic volumes).

Despite CPW, the state’s wildlife expert, communicating that the best available science supports their substantial concern for the capability of both Rocky Mountain bighorn sheep and desert bighorn sheep to persist over the long-term in the GMUG planning area, the Forest Service has elected not to include either of these species as SCC in the DRLMP. We think this is in error, and contrary to the plain reading and intent of 36 CFR § 219.9 (c) as well as FSH 1909.12, Chapter 10, Sec. 12.52d.3.c., and FSH 1909.12, Chapter 20, Sec. 21.22a.1.d.

The Forest Service bases its negative SCC decision for bighorn sheep on FSH 1909.12, Chapter 10, Sec. 12.52d.3.,²⁴ which lists 6 reasons/criteria a. through f. that “should be considered” when developing the SCC list. The Forest Service suggests that to be on the SCC list, a species must meet all the conditions identified in subpart f.(1)-(4). This reading of subpart f. is not consistent with the remainder of the Section, which suggests that a species may warrant listing as a SCC if any or some combination of criteria a. through f. are met sufficient to warrant a substantial concern for the capability of the species to persist over the long term in the planning area in order to satisfy the

²³ Colorado Parks and Wildlife. Comments- Lists of Species of Conservation Concern for the Grand Mesa, Uncompahgre, and Gunnison National Forests. June 28, 2021. 13pp.

²⁴ FSH 1909.12, Chapter 10, Sec. 12.52d.3.

requirements of 36 CFR § 219.9 (c) above.²⁵ In fact, both Rocky Mountain bighorn sheep and desert bighorn sheep meet multiple criteria listed in Sec. 12.52d.3.a. - f., including:

- c. Species identified by Federal, State, federally recognized Tribes, or Alaska Native Corporations as a high priority for conservation.
- d. Species identified as species of conservation concern in adjoining National Forest System plan areas (including plan areas across regional boundaries).
- f. Species for which the best available scientific information indicates there is local conservation concern about the species' capability to persist over the long-term in the plan area due to:
 - (1) Significant threats, caused by stressors on and off the plan area, to populations or the ecological conditions they depend upon (habitat). These threats include climate change.
 - (2) Declining trends in populations or habitat in the plan area.
 - (3) Restricted ranges (with corresponding narrow endemics, disjunct populations, or species at the edge of their range).
 - (4) Low population numbers or restricted ecological conditions (habitat) within the plan area.

The Forest Service contends that neither Rocky Mountain bighorn sheep or desert bighorn sheep meet criteria f.(4) above regarding low population numbers or restricted ecological conditions within the planning area. CPW's June 18, 2021 letter outlines the best available science with respect to population status and restricted ecological conditions within the plan area. CPW's letter demonstrates without question that Rocky Mountain bighorn sheep populations on the GMUG have long-experienced restricted ecological conditions, and that desert bighorn sheep are suffering from both low population numbers and restricted ecological conditions. With this in mind, Rocky Mountain bighorn sheep meet criteria c.,d. and f., and desert bighorn sheep meet criteria c. and f. We also note that, as stated in 12.52d.3.d. above, one of the reasons for the SCC designation is to provide consistency across planning units, and in particular those that are connected such as the GMUG and Rio Grande National Forests.

We request that the Forest Service reconsider its application of the criteria for identifying Species of Conservation Concern on the GMUG as they pertain to both Rocky Mountain and desert bighorn sheep. These species warrant listing as SCC in the DRLMP. The current DRLMP does not clearly provide the ecological conditions necessary to ensure that viable populations of Rocky Mountain and desert bighorn sheep are maintained for the long term.²⁶ We recommend that the Forest Service incorporate the additional plan components suggested above for these species and outline a

²⁵ This more flexible reading of Sec. 12.52d.3. is supported by FSH 1902.12, Chapter – Zero Code, Sec. 05.1 – Exhibit 01, which interprets the term “Should consider” in the FSH as “Thinking about a list of considerations is mandatory unless a justifiable reason exists for not taking action.” In other words, it is mandatory for the decisionmaker to *think* about the list of considerations – nothing suggests that the considerations themselves should be mandatory in each instance.

²⁶ 36 C.F.R. § 219.9 (b) – PLANNING, Subpart A – National Forest System Land Management Planning, *Additional specie-specific plan components* (2012)

monitoring program for specific indicators of the ecological conditions required to maintain viable populations of both Rocky Mountain and desert bighorn sheep in the Plan area.²⁷

3) Recommended Additions/Modifications to Geographic Area Designations

The DRLMP Alternative B includes many of the WMA designations recommended by CPW and those recommended Backcountry Hunters & Anglers (BHA) in their [GMUG Wild Lands and Wildlife Report](#), as well as additional WMAs recommended by Forest Service staff. We appreciate the GMUG including these areas in the DRLMP and strongly support these Management Area designations for the Final Forest Plan. We believe they provide the specific direction needed to balance increasing recreation use and conservation of our wildlife and backcountry opportunities.

New WMA Recommendations for Specific High Value CRAs identified in Alternative B

Most Wildlife WMAs included in Alternative B overlap some designated CRAs and would be managed under the applicable forest wide direction as well as the combined plan components for both Management Area types. However, our analysis demonstrates that some CRAs currently have motorized and/or mountain bike trails or designated snowmobile routes within their boundaries to the extent that additional trail/route development within them would jeopardize their value as wildlife habitat and their roadless character. Without the additional plan components for CRAs we have suggested (above), there is no guarantee that these areas will retain their roadless character or achieve the Desired Conditions for wildlife. Due to their high value for wildlife, we recommend that the following CRAs receive overlapping WMA designation:

- **Sunnyside.** This Roadless Area is located on the Grand Mesa and is one of the only Roadless Areas on the GMUG without any established trails. This area provides summer range for elk that extends on to the White River NF, elk winter range and winter concentration areas that extend into Plateau Valley, and several known migration routes connecting these seasonal habitats. Similarly, it includes summer and winter range for mule deer extending into the Plateau Valley. Rocky Mountain bighorn sheep habitat includes summer range and summer concentration areas, production areas, and winter range that extend onto the White River NF. Several bighorn migration routes have been identified connecting these seasonal habitats.
- **Dominguez.** This Roadless Area is located on the Uncompahgre Plateau and is contiguous with the Dominguez-Escalante NCA on adjacent BLM lands. It also provides connectivity to the Kelso Mesa WMA. The Dominguez Roadless Area provides elk summer range and summer concentration areas, production areas, winter range, and migration routes connecting these seasonal habitats. It also provides summer range for mule deer, as well as winter range, winter concentration areas, and severe winter range which is critical to survival.
- **Cimarron Ridge.** This Roadless Area comprises a large part of the Cimarron-Big Blue WMA recommended by CPW and BHA and should also be designated as a WMA to maintain its

²⁷ 36 C.F.R. § 219.12(a)(4)(iv) – PLANNING, Subpart A – National Forest System Land Management Planning, Diversity of plant and animal communities (2012)

Roadless character and wildlife habitat values. Cimarron Ridge provides elk summer range, summer concentration areas and production areas, as well as winter range on the lower west side. It also provides summer and winter range for mule deer. Travel on the limited number of existing trails is seasonally restricted from late September through early July to mitigate impacts to elk, and to provide opportunities for quality backcountry hunting.

- **Sunset.** This Roadless Area is located in the North Fork Valley of the Paonia Ranger District. This Roadless area contains winter range and winter concentration areas, summer range and summer concentration areas, production areas, and a major migration corridor for elk. Mule deer habitat includes summer range, winter range, winter concentration areas, and several migration routes connecting these seasonal habitats.
- **Cataract and Carson.** The Cataract and Carson Roadless Areas include 18,791 acres of National Forest adjacent to the Red Cloud Peak and Handies Peak WSAs on BLM lands to the north, and the Big Buck/Kitty/Ruby and the Pole Mountain/Finger Mesa Roadless Areas on the San Juan Forest. The Cataract and Carson Roadless Area provides habitat for elk, mule deer, and Rocky Mountain bighorn sheep. Elk habitat includes summer range, summer concentration areas, production areas, and an adjacent winter concentration area at Carson. A key elk migration corridor occurs within this area as well. Mule deer utilize the area as summer range, and it also contains a significant migration corridor for mule deer. Rocky Mountain bighorn sheep habitat includes summer range, summer concentration areas, production areas, and winter range. A key migration corridor for bighorn is within this area as well.
- **Crystal Peak.** The Crystal Peak Roadless Area is located on the southeast end of the Uncompahgre Wilderness near Lake City. This Roadless Area also provides high quality habitat for elk, mule deer and bighorn sheep. Elk habitat includes summer range, summer concentration areas and production areas. It is adjacent to an elk winter concentration area near Hensen and Lake City. A key elk migration corridor occurs within this area. Mule deer utilize the area as summer range and there is also a significant mule deer migration corridor to winter range in the valley below. Rocky Mountain bighorn sheep habitat includes summer range, winter range and winter concentration areas. It also contains a key migration corridor for bighorn and there are adjacent production areas.

Additions and Modifications to WMA Boundaries to Address Site-Specific Wildlife Concerns

There are a number of WMAs recommended by CPW and BHA that were not partially or wholly included within Alternative B or D. In addition, since the initial assessments for the Forest Plan revision were completed, CPW has collected additional seasonal habitat use and migration data for some ungulate herds. As a result, the WMAs included in Alternative B and D omit some important CPW-documented ungulate migration routes and additional backcountry areas important for other wildlife species. One of these areas, the **Eastern Gunnison Basin Ungulate Corridor (EGBUC) Cochetopa Hills Area**, contains a critical and unique inter-basin ungulate migration. Two of these areas, **Mckenzie** and **Naturita Division**, are adjacent to active leks and contain important habitat for the Threatened Gunnison sage grouse. Based on our review of the proposed WMAs in Alternative B and D of the DRLMP, we recommend the following additions and modifications to select areas of the GMUG:

- **Eastern Gunnison Basin Ungulate Corridor (EGBUC) Cochetopa Hills Area.** CPW recently documented a significant north-south ungulate migration corridor on the eastern side of the Gunnison Basin. The south end of the Eastern Gunnison Basin Ungulate Corridor (EGBUC) is in the Cochetopa Hills area. The Cochetopa Hills area of the EGBUC provides critical habitat connectivity between the Gunnison Basin and the San Luis Valley for ungulates (elk and pronghorn) migrating south to escape Gunnison’s severe winters. This is a true migration bottleneck that warrants conservation to maintain this critical inter-basin connectivity.

Most of the Cochetopa Hills area of the UGBUC is currently categorized as General Forest in the DRLMP, and large portions of the area are currently characterized as Roadless Natural ROS in both Alternative B and D. To maintain the function of this migration corridor, the area should be managed as Primitive, Semi-Primitive Non-motorized, or Semi-Primitive Motorized with route density limits consistent with WMA designation and CPW recommendations for High Priority Habitats. In addition, the area warrants seasonal route and/or area closures during the winter period (December 1 to April 30) when ungulates have been documented using this migration bottleneck. The plan components associated with WMA designation in the DRLMP are essential to provide the direction necessary to retain this migration corridor and habitat connectivity it provides between the Gunnison Basin and the San Luis Valley.

- **Dallas.** Alternative B includes most of the Dallas area north of the Sneffels Wilderness as General Forest outside any CRAs or Recommended Wilderness. BHA recommended the 20,800 acre Dallas WMA that includes the area identified in Alternative B and the Whitehouse Roadless Area.

The Dallas area provides essential summer range and summer concentration areas for elk, as well as several production areas situated between private land and the Sneffels Wilderness. It contains critical elk migration routes between summer habitat on National Forest lands and adjacent winter range on BLM and private lands. The Dallas area also provides extensive summer range for mule deer, and several migration routes are located between winter range and winter concentration areas located within and adjacent to the Forest. Rocky Mountain bighorn sheep occupy the adjacent Sneffels Wilderness year-round. CPW has identified and mapped areas of winter and summer use as well as production areas and migration routes in this proposed WMA.

The Dallas trail is currently open to mixed uses and does not include any seasonal restrictions. There is also a hut system within the area that accommodates both summer and winter use. Backcountry skiing is a very popular activity around these huts. The wildlife resources within the Dallas area are exceptional and any further trail development or increased recreational uses must be purposely managed to avoid impacting these resources.

- **Hayden Mountain.** Alternative B designates the upper Uncompahgre watershed including the entire Hayden Mountain area as General Forest. BHA recommended 8,552 acres of the Hayden Mountain area as a WMA. The Hayden Mountain area is situated between Highway US 550 through Ironton Park and the extensive jeep road systems within the high country of Yankee Boy Basin and Imogene Pass. The Hayden and Richmond trails within the recommended WMA area are currently limited to horse and foot travel.

The area within the recommended Hayden WMA provides high quality summer range and summer concentration areas for elk. It represents one of the key elk security areas in the region, and also provides high quality backcountry hiking and hunting opportunities.

The additional plan components applicable to WMAs are essential to provide the direction necessary to retain and/or enhance the wildlife resources and backcountry recreation and hunting opportunities in this area of the Forest.

- **Cimarron-Big Blue WMA.** Most of the area within the Cimarron-Big Blue WMA recommended by CPW and BHA is designated as a combination of WMA and/or Roadless within Alternative B of the DRLMP. One major exception is the entire area on the west side of the Cimarron Ridge Roadless area from Nate Creek to Deer Creek which is designated as General Forest. This section of the Forest provides high quality summer range and summer concentration areas for elk, as well as several production areas. Nate Creek and Deer Creek provide a significant elk security area and help reduce conflicts with elk use on the adjacent private lands. There are also critical migration routes between summer habitat on National Forest lands and adjacent winter range on public and private lands.

The Nate Creek trail bisects the area and provides a seasonal single-track motorized route from the Owl Creek Road to Silverjack Reservoir, which then connects to the Alpine Trail over to the Alpine Plateau. Under the current Uncompahgre Forest travel management plan, this trail system is only open to motorcycles from early July through the end of August. This limitation is to mitigate impacts to elk calving and fall security, while also providing an area for backcountry hunting opportunities beginning with the archery season and extending through the rifle seasons.

The wildlife resources and hunting opportunities within this portion of the Cimarron-Big Blue WMA are exceptional. Any further trail development or increased recreational uses should be managed consistent with the additional direction provided by WMA designation to avoid impacting wildlife resources and related recreational uses.

- **Spring Creek.** The Spring Creek area is located on the Uncompahgre Plateau south of Montrose, and comprises 12,471 acres recommended by BHA as a WMA. Alternative B of the Draft Plan designates the area as General Forest. The Spring Creek drainage provides important winter range and winter concentration areas for elk and mule deer. Elk and mule deer also utilize the area as summer range. Elk summer concentration areas and production areas exist within Spring Creek and the area is an important security area in this portion of the Uncompahgre Plateau.

The Spring Creek drainage has been the focus of collaborative efforts between the GMUG, BLM, CPW, and private landowners to implement habitat enhancement projects to sustain mule deer and elk populations. Mechanical treatments and prescribed fire have been utilized to improve habitat conditions on public and private lands under initiatives such as the Uncompahgre Project. Route locations and densities on the Forest were previously designed to avoid or minimize overlap with summer concentration areas and production areas. Existing ATV and single-track mountain bike trails are present on both the Forest and adjacent BLM lands. These trail systems have seasonal closures from December 1 through April 30 to mitigate impacts to elk and mule deer use of winter range.

The proximity of this area to Montrose and expanding development has already resulted in significant loss of big game winter range in Spring Creek. Both BLM and the Forest Service have received requests for additional trail development in this area. The Spring Creek area represents an area that will require the implementation of additional plan components consistent with WMA designation to maintain wildlife habitat capacity and connectivity.

- **Horsefly WMA.** Thank you for including the Horsefly WMA in Alternative B of the Draft Forest Plan. This portion of the Uncompahgre Plateau provides significant habitat for big game and other wildlife species. The lands within and adjacent to this WMA have also been the focus of a collaborative effort between the GMUG, BLM and CPW to improve habitat for big game and alleviate conflicts with elk use on the adjacent private lands.

The Dead Horse area southwest of Sanborn Park is an essential component of this WMA, and was unfortunately not included within the boundaries of the Horsefly WMA in Alternative B. Habitat conditions resulting from the 1990 Horsefly wildfire and subsequent mechanical and prescribed burning projects on BLM and Forest lands in the Dead Horse area in combination with a seasonal closure of the local road system have created a significant winter concentration area for elk in this portion of the Uncompahgre Plateau. It is vital to include the Dead Horse area within the Horsefly WMA to continue these management efforts at the landscape-level necessary to sustain habitat connectivity and our wildlife resources.

- **McKenzie.** The McKenzie Creek area is located on the south end of the Uncompahgre Plateau near Norwood. Alternative B of the Draft Forest Plan identifies the McKenzie Canyon Roadless Area as a WMA but designates the rest of this area as General Forest. BHA has recommended 27,550 acres to be designated as a WMA.

This portion of the Uncompahgre Plateau is a mix of ponderosa pine forest, mixed shrub lands of gambel oak, service berry, and mahogany, as well as sagebrush and grassy meadows. It is a significant winter range area for elk and mule deer, including both winter concentration areas and severe winter range. Portions of the area are also elk summer concentration and production areas. The sagebrush parks provide suitable habitat for Gunnison sage grouse, and there is an active lek on private land adjacent to the Forest.

Access for timber harvest and livestock grazing in the area has created an extensive road system throughout the area. These road systems also serve as the basis for summer motorized recreation. Efforts to reduce open route densities have been implemented as well as a seasonal restriction in some areas to mitigate impacts to big game winter range availability. Along with timber harvest, prescribed burning and mechanical treatments have been utilized to alleviate wildfire severity and improve forage production and availability for wildlife. Projects have also been implemented to remove trees invading sagebrush parks to improve nesting and brooding habitat for Gunnison sage grouse.

The area within the recommended McKenzie Creek WMA provides substantial habitat for elk and mule deer, and contributes an important addition to the adjacent Horsefly WMA. It also contains suitable habitat for Gunnison sage grouse that would be further protected by plan components consistent with WMA designation.

- **Naturita Division.** Alternative B of the Draft Forest Plan identifies Naturita Canyon south of Norwood as a Roadless Area. The remainder of the Naturita Division is designated as General Forest. BHA has recommended 17,488 acres to be designated as the Naturita Division WMA, which would include Naturita Canyon and additional National Forest lands primarily west of the canyon.

This area of the Forest and the adjacent BLM lands are critically important to big game and Gunnison sage grouse. In 2002 the Burn Canyon wildfire burned approximately 33,000 acres of Forest, BLM, and private lands west of Naturita Canyon. The size and intensity of this wildfire created a significant big game winter concentration area within this portion of the San Miguel Basin. Seeding and planting on public and private lands reestablished native grasses and forbs, and gambel oak, serviceberry, mahogany, and other browse species have vigorously re-sprouted. The GMUG responded to the needs of wintering big game following the fire by closing travel on all access roads in the area from December 1 through April 30. The Forest Service and BLM have also implemented a seasonal closure on the Thunder and Burn Canyon trail systems during the same time period.

Naturita Canyon and its tributaries of Busted Arm and Goshorn Draw are primary migration corridors for elk and mule deer migrating from higher elevation summer ranges of the Lone Cone to their winter ranges in the Burn Canyon area out to Dry Creek Basin. Impact to this winter range and these migration routes would have significant long-term impacts to elk and mule deer populations.

Active Gunnison sage grouse leks are present on State and private lands adjacent to the Naturita Division. Suitable nesting and brooding habitat is located on the Forest at East Naturita (Busted Arm), Stockdale Point, and the Hamilton Draw/Callan Draw areas. The loss of habitat to urban development and conversion of habitat to agricultural fields or livestock pastures has had a cumulative impact to the San Miguel Basin population of Gunnison sage grouse. The remaining lek areas and adjacent suitable habitats are essential to the recovery of the San Miguel Basin population of Gunnison sage grouse.

The proximity of this area to Norwood and rural development within the county have resulted in significant loss of historic wildlife habitat and movement patterns in the area and additional pressures are being placed on the BLM and GMUG for more trail development and recreational use. The Naturita Division represents an area that will require the implementation of additional plan components consistent with WMA designation to maintain habitat connectivity and the capacity of the area to maintain existing wildlife populations.

- **Lone Cone WMA.** Thank you for including the Lone Cone WMA in Alternative B of the Draft Forest Plan, along with the Cow Range and Little Cone WMAs. This portion of the San Juan mountains provide significant habitat for big game and other wildlife species, and is one of the most popular hunting and fishing destinations in the Norwood area. Hunters and anglers are a very important part of the local traditions and economy of this community.

The Goat Creek drainage is an essential component of the Lone Cone WMA but unfortunately was omitted from Alternative B in the Draft Forest Plan. The Goat Creek area

is a summer concentration and production area for elk. The rugged terrain, dense forested slopes and available forage and water provide one of the larger security areas for elk on the Lone Cone. It also provides connectivity to the rest of the forested habitats of the Cow Range and Little Cone WMAs as well as the west side of the Lizardhead Wilderness.

Past and present travel management plans for this portion of the GMUG recognized the need for access to timber sale areas and water infrastructure while maintaining low densities of open roads and minimizing habitat fragmentation. The proximity of this area to Norwood is placing additional pressure on the Forest Service to create new trail systems. It is vital to include the Goat Creek area within the Lone Cone WMA to continue these management efforts at the landscape-level necessary to sustain habitat connectivity and our wildlife resources and hunting opportunities.

4) Monitoring Recommendations

The monitoring framework outlined in Chapter 4 and Tables 22-31 do not incorporate monitoring questions for plan components designed to provide management direction for maintaining habitat connectivity and wildlife security areas across the forest. Connectivity includes the daily and seasonal movements of animals within home ranges, the dispersal and genetic interchange between populations, and the range shifts of species in response to factors like climate change. We recommend incorporating the additional monitoring questions below to explicitly incorporate monitoring habitat connectivity in the GMUG:

- **New Monitoring Question:** What is the status and trend of habitat connectivity in the GMUG providing for migration, genetic exchange, abundance, and daily and seasonal movements of animals across multiple spatial scales over time, including adjacent lands in the broader landscape?
 - o **Selected Plan Components:** FW-DC-ECO-05, FW-DC(GDL)-SPEC-12, FW-GDL-SPEC-16, MA-DC-WLDF-01, MA-STND-WLDF-02, and the additional plan components proposed for SPEC, REC, TLS, TSTN, and WLDF above.
 - o **Indicator(s) and Measure(s):** Route density trends in WMAs, CRAs, and CPW-mapped migration corridors; the number and distribution of wildlife security areas greater than 250 acres in each watershed; CPW big game population estimates
 - o **Data Source and Frequency of Collection:** Project-specific spatial analysis of route density and wildlife security areas during NEPA reviews, CPW annual population estimates, CPW periodic updates to migration corridor maps
 - o **Adaptive Management Actions:** Update migration corridor maps with the most recent CPW data, prioritize achieving route density criteria for WMAs, CRAs, and CPW-mapped migration corridors; restore and maintain well distributed wildlife security areas across the GMUG

- **New Monitoring Question:** What is the status and trend of wildlife security areas in the GMUG?
 - o **Selected Plan Components:** FW-DC-ECO-05, FW-DC(GDL)-SPEC-12, FW-GDL-SPEC-16, MA-DC-WLDF-01, MA-STND-WLDF-02, and the additional plan components proposed for SPEC and WLDF above.

- o **Indicator(s) and Measure(s):** Number of and distribution of wildlife security areas greater than 250 acres in each watershed, CPW big game population estimates
- o **Data Source and Frequency of Collection:** GMUG project-specific spatial analysis of wildlife security areas during NEPA reviews; CPW annual population estimates
- o **Adaptive Management Actions:** Prioritize restoring and maintaining well distributed wildlife security areas across the landscape

5) Recommended Clarifications

There are several clarifications needed in the “Segment Descriptions” for eligible Wild and Scenic Rivers described in Appendix 11. A more accurate description is needed in the discussions for Fall Creek, Kelso Creek, Points Creek, and the North Fork of Escalante Creek (pages 310-327) where the presence of cutthroat trout is rated as a high value. Recommended changes underlined in italics:

- Description of Outstandingly Remarkable Value: “Fall Creek ~~*contains a unique and important greenback cutthroat trout conservation population*~~ *supports a core conservation population of green lineage Colorado River cutthroat trout (Oncorhynchus clarkii pleuriticus)* used by CPW as brood stock. Fall Creek provides excellent habitat for this population of cutthroat trout to remain intact.

The same clarification is needed in the Kelso Creek, Points Creek, and North Fork of Escalante Creek descriptions of Outstandingly Remarkable Value.

Conclusion

Thank you for this opportunity to provide input on the DRLMP, and for your efforts to conserve backcountry habitats, wildlife and fisheries, and wildlife-related recreation on the GMUG. We greatly appreciate the incorporation of Management Area Direction for WMAs into the DRLMP Alternative B that includes Standards to limit route densities to ensure continued use by wildlife, and Guidelines for maintaining wildlife security areas and habitat connectivity across the landscape. We believe that the designation of WMAs and the associated plan components in Alternative B will provide the flexibility for the USFS to actively manage the forest while maintaining habitat connectivity and increasing conservation of the most important wildlife habitats across the forest.

We understand that active forest management is important to address the risk of catastrophic wildfire, to continually improve habitat conditions for wildlife, and to manage for habitat resiliency and forest health in the face of a changing climate. We believe that the additional plan components recommended in this letter provide the additional direction needed for vegetation management in WMAs to ensure that active forest management in WMAs is clearly designed to improve habitat conditions for wildlife.

We are also supportive of those portions of Alternative D in the Gunnison Basin supported by the local community that are consistent with the WMA management direction provided in Alternative B (and this letter) that provide additional protections for wildlife and wildlife habitat. For example, where Alternative D Special Management Areas (SMAs) overlap with Alternative B WMAs, we are supportive of the mineral withdrawal proposed for the SMA overlap because it does not modify the other management direction provided for WMAs in Alternative B. Similarly, we are supportive of

mineral withdrawal for those portions of Alternative D Recommended Wilderness Areas that overlap with Alternative B WMAs.

Our organizations and members appreciate the extensive outreach efforts by GMUG staff to share information and solicit input from stakeholders on the DRLMP. We look forward to continued collaboration on successful completion of the Final Revised Forest Plan. Please do not hesitate to contact Jon Holst at (970) 759-9588 if you have any questions about the content of this letter

Respectfully,



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