

CPW concluded that this could impose “a long-term and likely irreversible cost to [Mule Deer] and other wildlife.”

Alternative 2’s 6.4 miles of new trails, 1.9 miles of roads, expanded overnight accommodations, and nearly fivefold projected visitation closely resemble the scenario that CPW warned against.

5. The DEIS acknowledges reduced habitat effectiveness but does not provide the required numerical showing.

The DEIS states on pages 207–214 that:

- CPW has confirmed Elk migration and calving on the north side of the project area.
- CPW has documented Mule Deer migration and fawning on the north side of Sweetwater Road.
- Year-round occupation of the Administrative Zone would create new impacts to wintering Elk and Mule Deer.
- Increased activity would likely reduce habitat effectiveness around the campground and equestrian zones.
- Increasing summer recreation is becoming a concern to biologists.

Forest-wide Wildlife Standard 7 prohibits new roads and trails from reducing the Elk habitat-effectiveness index below 0.40 by Data Analysis Unit, or further reducing habitat already at or below that level. I could not locate a numerical habitat-effectiveness calculation in the DEIS demonstrating compliance with that standard.

6. Current herd numbers do not make permanent habitat loss acceptable.

CPW’s [2026 Big Game License Recommendation Summary](#) estimates the E-6 White River Elk herd at 42,470 animals in 2025, above its 32,000–39,000 objective, and D-43 at 7,900 Mule Deer, above its 4,000–6,000 objective. CPW is addressing those numbers through adjustable harvest management, including a 60 percent increase in E-6 antlerless licenses and a 19 percent increase in D-43 limited-rifle licenses.

Harvest quotas can change annually. Roads, trails, developed facilities, displacement, and removal of a winter-range designation can last for generations. Present abundance should not be used to justify permanent loss of high-priority habitat.

I respectfully ask RMEF to:

- Assign a wildlife biologist or lands specialist to independently review the Sweetwater DEIS.
- Submit formal comments opposing Alternative 2 and the removal of the Management Area 5.41 winter-range designation.
- Advocate for No Action or a substantially reduced alternative that confines improvements to existing disturbed footprints.