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See letter for additional works cited**All CDA comments/suggestions/questions are symbolized in the light blue color** Commodity use and Community Connections
The grazing program also helps to maintain agricultural open space on private lands pressured by subdivision and development
This section recognizes the importance of GMUG[rsquo]s rangeland resources to the ranching industry in the planning area. CDA supports sustainably managed livestock grazing as a congressionally mandated use of federal lands that is vital to the ranching industry and beneficial to wildlife and associated natural resources. Properly managed livestock grazing has positive ecological effects1,2,3and helps to preserve more expansive and unfragmented landscapes that benefit wildlife.4 The vision for the revised plan should include maintaining or improving the rangeland resource in partnership with a viable livestock industry.
Old Growth

FW-GDL-TEV-22 [ldquo]old growth stand should occur as larger blocks with a patch size greater than or equal to 640 acres. [ldquo]
Suggest: change to desired minimum of 640 acres. Change from [lsquo]old growth habitat[rsquo] to [lsquo]vegetation structure and species composition that characterizes old growth[rsquo].
Terrestrial Ecosystems and Vegetation

FW-GDL-TEV-23: To create and maintain aspen islands important as biodiversity hotspots for wildlife, those areas that stimulate aspen regeneration or otherwise contribute to maintaining these areas as aspen refugia on the landscape are prioritized for treatments and protected from over-browsing. See also Wildlife OBJ-XX. Sagebrush ecosystems support the habitat needs of Gunnison sage-grouse and other sagebrush obligate species.

Is this a location to reference a Grouse management plan or reference sagebrush steppe ecosites. (similar to Table 1. Desired conditions for seral stage distribution and fire regime by ecosystem at the geographic area scale)
Sagebrush obligate species need large patches of pure sagebrush, and not sagebrush mixed with other shrub species or trees. Aspen does co-occur with sagebrush but this is not suitable breeding or nesting habitat for sagebrush obligate species because aspens provide perches for raptors that predate on these sagebrush obligates (Gunnison sage-grouse, etc.). Aspen co- occurring with sagebrush can provide suitable breeding habitat for other fauna, such as cavity nesting birds, ground-nesting birds, game birds (blue grouse), and winter or general summerhabitat for elk, deer, etc. They are also important for scenic views. Typically when aspen and

sagebrush co-occurs, it is usually because one has encroached upon the other. Aspen is an important vegetation type and the persistent aspen stands on the GMUG are unique in that they seem to be persistent. But not all aspen stands are equally contributing to fauna needs. Further, are the aspen stands on the GMUG experiencing SAD or black trunk rot? If so, this is not over- browsing. Furthermore, if aspen are so important to fauna, then browse is an important source for elk and so browsing should be tolerated. Where else are elk going to browse? And how are you going to control browsing anyway? Why isn[rsquo]t browse tolerated? If over browsing is not tolerated, what is the protocol for monitoring browsing utilization.

Montane-Subalpine Grasslands

Desired Conditions

FW-DC-TEV-24: Depending on site capability, bare soil is no more than 30% within a stand and is most often less than 10%. Vegetation percent cover averages 40[ndash]60% grass, and 10[ndash]30% forbs. See also Range GDL XX-XX and XX-XX.

Curious as to what this would entail with Range GDL XX-XX and XX-XX.
Alpine Uplands
FW-OBJ-TEV-25: Within 10 years of plan approval, enhance the resiliency of alpine ecosystems on 100 acres of GMUG lands through implementing recreation management plans, completing mine land reclamation, or conducting other management activities.
After the 10 years, post plan 100 acres, Does this program cease?
Suggest: 100 acres of management activities, every decade the plan is in implementation.

FW-STND-TEV-26: Campfires in alpine ecosystems shall only be permitted in existing fire grates or in fire pans.
Given the high altitude of these areas and the percentage of these vegetation types in Wilderness, would the development of fire grates or fire pans be allowed?
Suggest: campfires in alpine ecosystems shall be prohibited, unless existing fire grates or temporary fire pans are used for control.

FW-GDL-TEV-27: To maintain their ecological integrity and associated native species, management activities and visitor use should not result in a long-term net increase in ground disturbance in alpine ecosystems.
With the popularity of [ldquo]14er[rdquo] and wilderness use in Colorado. We suggest an objective to develop monitoring protocols, which access damage to alpine ecological integrity that could result in long-term net increase in ground disturbance.
FW-OBJ-RMGD-33: During each 10-year period following plan approval, restore or enhance at least 2,500 to 5,000 acres of riparian and meadow habitat, and restore hydrologic function for at least 15 to 30 miles of perennial, intermittent, or ephemeral streams. Actions to help accomplish this objective may include: implementing erosion-control restoration techniques, removing conifer encroachment, promoting riparian plant species growth and recovery, road decommissioning, re-introducing beavers where they can be sustained or other management actions, etc.

[ldquo]during each 10-year period following plan approval[rdquo] shows the continued commitment to protecting the resource regardless the age of the Forest Plan.

FW-STND-RMGD-34: Riparian management zones shall be delineated as follows:

Category 2: Fens, wetlands, lakes/ponds and reservoirs: consist of the body of water or wetland and the area to the outer edges of the riparian vegetation; or to the extent of the seasonally saturated soil; or 100-feet slope distance from the edge of the wetland or the maximum pool elevation of constructed pond and reservoirs with shorelines composed of riparian vegetation, whichever is greatest (Table 3).

Exclusion of Range improvements (livestock tanks) from the statement: [ldquo]the maximum pool elevation of constructed pond and reservoirs with shorelines composed of riparian vegetation[rdquo]. Maintenance is an important step in range management and maintaining (dredging) livestock tanks is vital to proper livestock distribution/management. Suggest adding language that properly permitted and recorded livestock tanks are exempt from this Standard. Constructed ponds for livestock and large mammals needs to be a 3rd category. Category 2 should be
[lsquo]naturally occuring[rsquo] water bodies.
FW-STND-RMGD-36: To maintain stream thermal cover and prevent windthrow within the riparian management zone, clearcut harvest shall not occur in riparian management zones.
This standard reduces the ability to manage woody invasive species (e.g. Tamarix, russian olive, etc.) that have to potential create monoculture.
Suggest: Clearcut harvest of desired native riparian vegetation shall not occur.

FW-GDL-RMGD-41: To maintain the structure and function of riparian management zones, firelines should be located and configured to minimize sediment delivery and limit the creation of new stream channels.
WHILE providing for firefighter and human health and safety, should be noted on all wildland fire sections. These provisions are accurate statements for Rx fire planning.
FW-GDL-RMGD-42: To maintain ecological integrity and support native species (including at-risk species), design projects to avoid ditching, damming, dewatering, or flooding of fens and wetlands.
Suggest: Design Projects to maintain ecological integrity by avoiding ditching, damming, dewatering, or flooding of fens and wetlands
This gives the flexibility to maintain existing structure or apply mitigation measures to future projects that may benefit ecological function in the long term.

FW-GDL-RMGD-43: To monitor water flows to, within, or between groundwater-dependent ecosystems, groundwater developments (e.g., recreation and administrative sites, drinking water wells, wastewater facilities) should have functional water flow meters installed.
Please clarify and elaborate. Is the purpose to monitor outflows of developed water sites? Monitor use or contaminants?
FW-DC-AQTC-45: Environmental flows are sufficient to create and maintain riparian, aquatic, and wetland habitats; retain patterns of sediment, nutrient, and wood routing and transport while maintaining reference dimensions (e.g., bankfull width, depth, entrenchment ratio, slope, and sinuosity); ensure floodplain inundation occurs, allowing floodplain development; and ensure that the timing, magnitude, duration, and spatial distribution

of peak, high, and low flows are retained.
Is this specific to aquatic ecosystems below water control structures? This seems feasible in a controlled aquatic system (dam structure where it can be controlled). In the smaller tributary streams, how is it possible to create and maintain flows during a drought period?
FW-STND-AQTC-48: Cooperate with Federal, State, Tribal, local governments and other stakeholders to identify and secure environmental flows needed to maintain riparian resources, channel conditions, and aquatic habitat.

Make it an objective not a standard (feasibility to secure the flows).

FW-GDL-AQTC-49: To prevent entrainment and/or entrapment of fishes and other aquatic organisms, new and reauthorized water withdrawal systems (e.g., impoundments, diversions, and associated ditches) should have screens (or comparable structures/equipment).
Is the guideline to "prevent entrainment and/or entrapment of fishes and other aquatic organisms by ensuring water withdrawal systems (new and reauthorized) have preventative infrastructure installed?

FW-GDL-AQTC-51: To prevent incidental mortality of at-risk species, and minimize the spread of aquatic nuisance species and aquatic pathogens, aircraft dip sites and drafting locations should be located away from known occurrences of at-risk species (e.g., cutthroat trout, boreal toad, etc.) and in areas free of aquatic nuisance species and aquatic pathogens.

State listed noxious aquatic plants are known to occur in Colorado. Several other aquatic noxious plants are listed but not yet known in Colorado. Several other invasive aquatic plants have the potential to get introduced into Colorado from known populations in other states with

similar ecological conditions as Colorado. This guideline needs to be extended to consider all invasive aquatic species, not just zoological species. It also needs to be expanded to discuss how to prevent introduction of aquatic invasive species into all waterbodies - not just prevent introduction into sites suitable for at-risk species.

FW-DC-IVSP-53: Native plant communities composed of a diverse mix of native grass forb, shrub, and tree species dominate the landscape, while invasive species are nonexistent or low in abundance and do not disrupt ecological function.
Desired conditions described for noxious weeds are not stated in terms of what the desired condition is that the forest is trying to achieve. Desired conditions should be consistent with or more aggressive than CDA[rsquo]s Rules Pertaining to the Administration and Enforcement of the Colorado Noxious Weed Act5 for List A and List B species, which describes specific management rules for each noxious weed species across all land jurisdictions and is updated biennially.
Goals, objectives, and guidelines established for noxious weeds in the draft forest plan should include significant, quantifiable reductions in population sizes, geographic extent, and impact of List A and List B noxious weed species on NFS lands. There should also be provisions to include the use of state-approved biological control agents as one of the tools available to manage noxious weeds. Also please include requirements for interagency coordination with CDA and local weed managers on noxious weed inventories, data sharing, technology transfer, treatment applications, and monitoring.

FW-OBJ-IVSP-54: Annually, invasive species management actions are employed on 10 to 20 percent of inventoried acres so that: new infestations are prevented, densities of existing infestations are reduced, total acres or areas infested are reduced, infested areas are restored/rehabilitated, existing infestations are contained, controlled, suppressed, or eradicated depending on infestation characteristics (size, density, species, location, etc.), management opportunities, and resource values at risk, and uninfested areas are maintained and/or

protected. Priority treatments will include:

* Early treatment of new infestations so that they are eradicated before becoming entrenched.
* Annual treatment of administrative sites until populations are eradicated.
* Treatment of cheatgrass in sagebrush, particularly Gunnison sage-grouse designated critical habitat
This objective makes it sound like state listed noxious or invasive species are only going to be controlled under those three bulleted conditions. However, there are many forest activities and sites that facilitate the spread and establishment of state listed noxious and invasive species (e.g. timber harvest, fire line construction, motorized vehicle use, etc.). This objective ignores all those other high risk activities. What is defined as an administrative site in this Forest Plan? Are roads? trails? dispersed campsites? Or just administrative building sites (office, work station, etc.)? Also, is cheatgrass the only noxious weed that would be treated in designated critical habitat? What if other noxious weeds occur or get introduced into those sites? It also ignoresaquatic invasives (flora and fauna). The way the objective is worded, it seems like is falls short of the DFC.
FW-STND-IVSP-55: For all proposed projects or activities, the risk of invasive species introduction or spread shall be determined and appropriate mitigation measures shall be implemented using best management practices and integrated pest management practices (USDA Forest Service 2013), including but not limited to decontamination procedures on vehicles and equipment and the use of weed-free products.
This standard neglects to address aquatic noxious and invasive species (flora and fauna)
FW-STND-IVSP-56: Contracts and permits for activities on the Forests, including facility maintenance and leases, will include requirements to both prevent the introduction and/or spread of invasive species and treat invasive species on National Forest System lands and resources that occur as a result of their actions.
While good intentioned, there are several activities that get implemented by force-account (agency employees) and partners that have similar risks as contracted and permitted activities. These other types of activities need to be considered too. Again, don[rsquo]t forget aquatic invasive and noxious species.
FW-GDL-IVSP-57: To prevent the spread and establishment of invasive plant species following ground-disturbing activities, areas identified, as needing mitigation should be reseeded with a mixture of plant species native to the context area to establish ground cover during the first growing season following the disturbance. Plant and seed materials used should be appropriate to the site, capable of establishment, and not invasive, and should include species preferred by pollinators. See also Pollinator section.
Alternate seed sources that can compete with invasive grasses (other states are having problems with cheatgrass)
Forbs are important for pollinators, however grasses are very important for establishing ground cover as most forbs do not readily take with seeding efforts. A mix of annual and perennial

grasses are needed in addition to forbs for success. Also, how is [lsquo]invasive[rsquo] defined? There are lots of non-native species (to Colorado) that are not on the state noxious weed list and that are not prohibited by the Forest Service Manual that have been used in Region 2 for

reclamation/restoration that now could be considered [lsquo]invasive[rsquo].

Invasive Species

Suggest: Addition of a Guideline reference the comment on FW-DC-IVSP-53

FW-GDL-FFM-62: To ensure that wildland fire burn in an ecological manner, fuel complexes (surface loading, ladder fuels, canopy cover, patch sizes/age classes), should be managed to meet the appropriate fire regime for the ecosystem type as described in the Ecosystemsection,

[ldquo] To ensure that a wildland fire burn[rdquo] gives the sense that a wildfire is under control. Suggest: Manage forest to promote wild fires burn in an ecological manner.

FW-DC-SPEC-68: Forage availability is maintained or increased, where capable, and contributes to ecosystem resiliency and forage for nongame species, livestock, and big game.

Suggest: Add permitted to livestock.

FW-OBJ-SPEC-69: During each 10-year period following plan approval, restore or enhance at least 25,000 to 80,000 acres of habitat. Of acres treated, 30 percent should be conducted in Wildlife Management Areas, 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 or habitat connectivity by removing unneeded structures, implement 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), improving aquatic and riparian resources (e.g., remove barriers, restore dewatered stream segments, connect fragmented habitat, provide organism passage, etc.), etc
Consistency: [ldquo] for every decade of the life of this plan" as used in the Fires section.
FW-OBJ-SPEC-70: During the first 5 years following plan approval, install vent pipe screens on all restrooms at developed or dispersed recreation sites to prevent bird entrapment.

Suggest: [ldquo]install vent pipe screens on all existing restrooms at[rdquo] .

FW-GDL-SPEC-72: To conserve wildlife and fish habitat connectivity and restore natural hydrologic function, constructed features (e.g., exclosures, water developments, range improvements, fences, and culverts) should be maintained to support the purpose(s) for which they were built and removed when no longer needed or modified to provide benefits to wildlife. New infrastructure (e.g., fences, roads, facilities, water developments) should be designed to reduce impacts to habitat connectivity, based on the best available scientific information.
The highlighted statement is vital to maintaining range improvements and ensuring proper management of livestock to promote healthy forest and rangelands.
FW-GDL-SPEC-73: To minimize habitat impacts and direct disturbance of raptors and migratory birds during nesting and winter periods, utilize buffers and/or timing restrictions based upon best available scientific information. Effective site-specific topographic barriers may be used to modify these buffers.
Suggest adding language about historical uses. Raptors tend to have multiple nests or build a nest in a more suitable location, which could overlap on an active livestock operation (corrals/water tanks etc.). Proper mitigation should be coordinated with permitees, while continuing historic livestock operations, which maintain forest/rangeland health and possibly creating the desirable habitat that influenced the location of the new nest.
FW-OBJ-SPEC-75: Management activities on the Forests will maintain, restore, or create 106,000 acres of pollinator habitat within 10 years of plan approval.

This amount represents the GMUG[rsquo]s contribution to the agency-wide objective of maintaining, restoring, or creating seven million acres of pollinator habitat.
Suggest: manangment activities on the Forest will maintain, restore, or create 106,000 acres of pollinator habitat. For every decade after
Is this objective attainable or is it part of the overall DC of native vegetation diversity Forest wide. Maybe reference FW-DC-SPEC-74 in maybe this is part of the OBJ in terrestrial ecosystems and vegetation. The desired condition is composition and phenology of native plant communities.

FW-DC-SPEC-80: Relatively undisturbed areas provide habitat blocks that function as security areas for populations of big game and other species. Migration and movement corridors provide sufficient cover to allow for relatively unabated movement of big game species across the landscape.
What is the definition of [ldquo]security[rdquo]? Consistence is needed between FS manuals/handbooks and CPW[rsquo]s verbiage as they are the managers of state wildlife.
How does this influence, decisions made in the expansion of Recreation Emphasis Management Areas?

FW-STND-SPEC-81: Maintain effective separation between domestic sheep and bighorn sheep on active grazing allotments. Effective separation is defined as spatial or temporal separation between bighorn sheep and domestic sheep. Tier 1 bighorn sheep herds with the greatest potential to contribute to population viability in the plan area are prioritized in managing for effective separation. Tier 2 herds, where they interact or have the potential to interact with Tier 1 herds, are also prioritized for managing for effective separation.
Standards in the LMP must have the flexibility that allows managers to provide for both uses. Elimination of risk of interaction is not a realistic goal. Minimizing the potential for interaction through best management practices should be the objective. CDA proposes the following wording:
[ldquo]Manage for effective separation between bighorn sheep and domestic sheep to minimize the risk of interaction between animal groups. Effective separation is defined as spatial, temporal, or anthropogenic (i.e. herd management) separation that minimizes the potential for interaction between bighorn sheep and domestic sheep.[rdquo]

FW-GDL-SPEC-92: To maintain viable populations of at-risk species, particularly in alpine habitats, the Forests will limit use (motorized or nonmotorized, foot or stock traffic) to designated routes (seasonally or in limited areas, not Forestwide); implement seasonal closures on recreational use over limited areas; limit activities that require special use permits; and/or implement other such temporary or limited-area measures as needed to reduce impacts of recreation and forest use.
Is this in reference to FW-GDL-SPEC-97? Is this to set up a special forest closure to human entry, occupancy and use? How is it possible to prevent off-route travel into these areas, which have to be defined on a map with a boundary, without requiring a closure to human entry, occupancy
and use? Doesn[rsquo]t the Travel Management Plan already require motorized uses to stay on designated routes? Is this enforceable?

FW-GDL-SPEC-97: To assist in species recovery and to avoid direct species and habitat impacts, livestock grazing, livestock trailing, and new or realigned recreation trails should be buffered by 600 feet of Uncompahgre fritillary butterfly colonies and their snow willow habitat.
Are these areas mapped to an accuracy that this statement can be made. Is this part of terms and conditions on grazing permits or addressed in individual AMP? What sort of terms and conditions are on specific permits that lie within these habitats?
FW-OBJ-SPEC-101: Within 5 years of plan approval, assess and identify sections of fence lines in Gunnison sage-grouse habitat with a high potential for sage-grouse collision and mortality based on best available scientific information. Evaluate options for removal (if no longer needed), relocation (if feasible), or fence marking to increase visibility.
Suggest adding language that includes coordination with affected permitees.
FW-GDL-SPEC-114: To avoid disturbance to sage-grouse during the breeding season, noise sources resulting from management activities from March 1 to July 15 should not exceed disturbance thresholds in breeding habitat, as determined by best available scientific information.

This becomes a moving target depending on issuance of special use permits. Would setting a decibel level and timing standard in the plan help with consistency for the life of the plan? Is this part of the listing documents for grouse that can be tiered by the Forest Plan?

FW-OBJ-DTRL-145: Within 10 years of plan approval, relocate the Continental Divide National Scenic Trail off of roads.
Additional disturbance of land away from roads creates an access issue, which, also contributes to excessive habitat fragmentation. This also creates additional maintenance needs for trails. Is this addition of trail maintenance something the forest can accommodate?
This has potential to reduce Rangers ability of enforcement.

Suggest adding a standard reference: Leashing of dogs in recreation areas and trails. This will protect both livestock and wildlife.

C.R.S. 35-43-126

Any dog found running, worrying, or injuring sheep, cattle, or other livestock may be killed, and the owner or harborer of such dog shall be liable for all damages done by it.

Energy and Mineral Resources

All Minerals or Energy Projects

Addition of a standard to ensure proper mitigation measures are taken to prevent the spread of noxious weeds.

FW-OBJ-RNG-199: During each 10-year period following plan approval, permittees are to maintain or reconstruct at least 10% of the range improvements assigned in their term grazing permits.
Is this dependent on the NEPA process, cooperation and funding? Is this something that FS is currently measuring and are all improvements properly inventoried and inspected for compliance?
FW-OBJ-RNG-200: Every 3 years following plan approval, conduct sufficiency reviews of at least 10% of grazing decisions to ensure that NEPA-based decisions remain current and sustainable for all active grazing allotments.
Is this a standard practice by GMUG that is already in use? Does GMUG have a current backlog of grazing permitting?
FW-STND-RNG-201: Short- and long-term monitoring methods (i.e.,moderate utilization level, grazing response index, canopy cover) shall be used to determine if grazing objectives for each allotment (as identified through the NEPA process and defined in their allotment management plan) are being met (using protocols such as May 2014; Holechek 1988; Holechek et al. 2010; Rangeland Analysis Training Guide, 1996; Colorado Rangeland Monitoring Guide, 2014). If short-term monitoring shows that

objectives aren[rsquo]t being met, rangeland management personnel shall adjust the timing, frequency, and/or

intensity of livestock grazing to meet objectives. If long-term monitoring reflects the same, management direction shall be changed.
Changes to livestock grazing should not be made unless monitoring shows that livestock are the causal factor/or other resource objectives are not being met.
The highlighted statement is a strong statement and does not support adaptive management. In addition, the last sentence [ldquo]shall be changed[rdquo] is too restrictive. Maybe maintenance and permitting of range improvements could help the situation. Active range management is key on both the permitees part as well as USFS involvement and clear management objectives that are understood by both parties to move towards proper rangeland health.

FW-STND-RNG-202: No salting or mineral supplementation shall occur on or adjacent to known populations and/or habitat of at-risk plant species, highly erosive soils, biological soil crusts, within 0.25 mile of a water body or riparian management zone, nor in known archeological sites and other historic properties. See also Ecosystems DC-XX.
Are these areas mapped to a degree of accuracy that this statement can be made? Adding a statement that site specific salting/mineral locations will be addressed in an AMP or with permittee coordination.
Maybe it can be a guideline with an objective: to map sensitive areas within XX years and have locations that are identified for salting/mineral.

FW-GDL-RNG-205: To maintain rangelands in satisfactory condition and improve sites in unsatisfactory condition, livestock grazing should not exceed moderate utilization (40 to 60% of the current above- ground biomass) in key areas. Exceptions may be allowed to meet objectives related to scientific studies, fuels reduction, invasive plant control, or other targeted grazing or site-specific objectives. Utilize the Rangeland Analysis Training Guide, 1996, and the Colorado Rangeland Monitoring Guide, 2014, when assessing rangeland condition (as well as other methods/guides as they are developed).
Removing the statement: (as well as other methods/guides as they are developed). Utilization monitoring is hard to replicate and methods should be consistent for the life of the plan.
Changing monitoring methods reduces the USFS ability to monitor trends.

FW-GDL-RNG-207: To minimize soil compaction and impacts to alpine and riparian areas and at-risk species, bed grounds for sheep should be used less than 3 days. Bed grounds should be located on rocky or otherwise hardened sites, and be located at least 0.25 mile away from riparian management zones, at-risk or rare plant species, or known at-risk butterfly habitat. Trailing sheep through these sensitive areas should be avoided.
Suggest changing the highlighted section or adding language: trailing sheep through these sensitive areas should be avoided during specific life stages of the butterfly.
FW-STND-REC-217:

This standard should also be reflected in an OBJ, similar to FW-OBJ-REC-214.

FW-OBJ-REC-214: Within 10 years of plan approval, ensure access portals (e.g., trails, parking lots, and trailheads) to 14,000-foot peaks include adequate facilities to mitigate ecological impacts associated with increasing use.
This objective should have a standard that monitors the ecological impacts that 14er recreation has on the lands that are traversed from the trailheads/parking locations to the destination.
Similar to FW-STND-REC-217
FW-STND-WLDN-252: Equipment, personal property, or supplies shall be prohibited to be stored in wilderness areas longer than 7 days.

Do permitted livestock operators have administrative use to store supplies while in the high country? Is this something that is in the Terms and Conditions/AMP for Permitees?

FW-STND-WLDN-253:

Should follow: C.R.S. 35-43-126
Any dog found running, worrying, or injuring sheep, cattle, or other livestock may be killed, and the owner or harborer of such dog shall be liable for all damages done by it.
FW-STND-WLDN-256: The use of a drone in a designated wilderness shall be prohibited. For minerals direction pertinent to designated Wilderness, see FW-STND-ENMI-XX and FW-STND-ENMI-XX.
Addition of language that will allow use of drones for administrative use or research purposes.
FW-STND-MTR-274: Mountain resort management plans shall include vegetation management measures that are updated on a 10 to 20 year basis and/or when conditions have significantly changed due to shifts in forest health (e.g., insect and disease).
Addition of language that resort management plans shall follow the CDA invasive species list A/B/C
Management approaches Range

Review vacant allotments, and review applications to help livestock operators to reestablish vacant allotments.

Review and update NEPA on vacant allotments to provide alternate allotment that may help with adaptive management of active allotments (Grass banks).

Engage with cooperators, young livestock operators and existing permitess to reduce vacant allotments.

Engage cooperators in stewardship activities and framework design.

Policies and Guidelines

Colorado noxious weed act And

C.R.S. 35-43-126

Any dog found running, worrying, or injuring sheep, cattle, or other livestock may be killed, and the owner or harborer of such dog shall be liable for all damages done by it.

As the majority of other public lands uses are analyzed throughout the Plan, the high use of recreation should also be analyzed in an equivalent manner. CDA recognizes the economic influence outdoor recreation

contributes to the local economy. CDA would like the Forest Plan address the impacts of all uses (individual/cumulative) on public lands. The following information should influence the management objectives based on the current demographics and uses that are unique to Colorado.

1991 Colorado population 3.368 million (GMUG forest plan decision) 2018 Colorado population 5.696 million

https://www.statista.com/statistics/206101/resident-population-in-colorado/

Approximately 92% of Coloradans recreate in the outdoors at least once every few weeks

This document should be referenced to show that recreation is the most significant use the agency/organization is currently facing with respect to conserving natural resources in Colorado.
Visitor service issues reflect capacity and visitation challenges.
Each of the top three visitor service issues (i.e., enforcing responsible use; providing programs to engage youth; and maintaining visitor safety), represent, to some extent, a lack of capacity, an increasing number of visitors, or perhaps both.

For example, it is unclear if managers are unable to [ldquo]enforce responsible use[rdquo] due to the sheer number of visitors, a lack of staff/resources, or because visitor behavior is becoming increasingly negative.

Planning to expand recreation areas needs to be thoroughly evaluated as enforcement is the limiting factor.

https://cpw.state.co.us/Documents/Trails/SCORP/Final-Plan/2019-SCORP-Report.pdf

Examples of other regulated uses in the state and on the FS system. Wildlife - population thresholds/hunting control

Grazing permits - regulated by AUM/days of grazing/timing Mining/Oil and gas - regulated by Leasing Units

Forestry - regulated acres harvested/year

Roads/Routes - regulated by the Colorado Roadless Rule

Recreation [ndash] does not have thresholds or trigger points that are monitored to effects (positive or negative). Does the forest service have protocols that show how recreation influences the DC objectives and are contributing the ecosystem services that are need to manage USFS property.

Wildlife disturbance

The estimated probability of elk flight from a human disturbance was highly dependent on distance. When elk and humans were close to one another, the maximum probability of a flight response was approximately 0.65 during ATV, mountain bike and hiking activity, and 0.55 during horseback riding (Figure 3). Higher probabilities of flight response occurred during ATV and mountain bike activity, in contrast to lower probabilities observed during hiking and horseback riding (Table 1). Probability of a flight response declined most rapidly during hiking, with little effect when hikers were beyond 550 yards (500 m) from an elk. By contrast, higher probabilities of elk flight continued beyond 820 yards (750 m) from horseback riders and 1,640 yards (1,500

m) from mountain bike and ATV riders (Figure 3).
These activities may have effects on wildlife that are more secluded for that majority of the year, but receive high recreation activity in summer months.
https://www.fs.fed.us/pnw/pubs/journals/pnw_2004_wisdom001.pdf