

Data Submitted (UTC 11): 7/26/2019 6:00:00 AM

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[ldquo]The sportsmen[rsquo]s voice for our wild public lands, waters and wildlife[rdquo]

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Grand Mesa, Uncompahgre and Gunnison National Forests

Attn: Plan Revision Team

2250 South Main Street

Delta, CO 81416

July 27, 2019

Comments on the Preliminary Draft of the Forest Plan

Thank you for the opportunity to review and comment on the preliminary draft of the GMUG Forest Plan. We appreciate the extra step the Forest is taking to allow the public to review a working draft of the Forest Plan and help guide the land use decisions and priorities for our National Forests.

The stated purpose of commenting on the preliminary draft of the forest plan is for us to let the planning team know what direction works and what needs improvement to help inform the draft forest plan and to help prepare the Draft Environmental Impact Statement. We think this is an essential step in the planning process and we offer both general comments and detailed proposals.

Chapter 2 [ndash] Forest Wide Direction

Overall we feel that most of the forest wide direction is too general in nature and needs to be more specific in order to provide clear direction to both the Forest Service and the public. The preliminary draft is focused more on Desired Conditions and Objectives which are good, but they are often not supported by accompanying Standards and Guidelines. Many of the Objectives need to be elevated to the level of Guidelines, and additional Standards need to be developed to specify how those Guidelines and Objectives will be achieved.

We understand the desire for flexibility and adaptive management on behalf of the Forest Service. However, we feel the preliminary draft leaves far too much to individual interpretation and discretion when it comes to documenting project and activity consistency with the forest plan under NEPA and the 2012 Planning Rule.

After reviewing the preliminary Forest Wide Direction, we have several comments and recommendations which are related to the primary issues we have expressed in the past.

Part II - Ecological Sustainability [ndash] Key Ecosystem Characteristics

Connectivity: FW-DC-ECO-06. This Desired Condition is good but needs to be further supported by the following Standards and Guidelines:

- * FW-GDL-ECO-00. Develop landscape-level mapping to identify primary corridors necessary to connect core wildlife habitat areas.

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FW-GDL-ECO-00. Wildlife habitat connectivity will retain integrity of big game migration corridors.

- * FW-STND-ECO-00. Prevent permanent road construction and recreational trail development within big game migration corridors.

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FW-GDL-ECO-00. Connectivity between lynx analysis units will be provided by the identification and retention of linkage zones.

- * FW-STND-ECO-00. Linkage zones will be managed to promote movement of lynx between suitable habitats.

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FW-GDL-ECO-00. Ensure stream habitat connectivity to allow unrestricted movement for fish.

- * FW-STND-ECO-00. Identify and replace or remove road culverts and other stream crossings that prevent fish passage.

- * Identify stream diversions and dams which block fish access to suitable habitat and provide structures that allow passage.

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Identify impoundments that are no longer functional and remove dams that prevent fish access to available habitat.

Old Growth: FW-GDL-ECO-10. This guideline needs to have Standards to define habitat needs for old growth dependent wildlife species.

- * FW-STND-ECO-00. Provide interior habitat conditions on the landscape for northern goshawk in aspen and mixed aspen-conifer forests that include active and alternate nesting sites and post-fledging areas.

- * FW-STND-ECO-00. Retain old growth structural habitat requirements for pine marten in spruce and spruce-fir forests.

Riparian Management Zones and Groundwater Dependent Ecosystems: RMGD. Changes to existing Forest-Wide direction and additional Standards and Guidelines are needed to support the Desired Conditions for RMGD.

- * FW-STND-RMGD-09 would prohibit clearcutting in riparian management zones (RMZs). Additional Standards that are currently standard operating procedures for timber sales are needed on logging in RMZs.

- * FW-GDL-RMGD-10 should be a Standard. Mining for common variety (salable minerals or mineral materials) is totally within the Forest Service's control, so mines should never be located in RMZs.

- * FW-GDL-RMGD-12 should be a Standard. Storage of fuels and other toxic chemicals, and refueling and maintenance of equipment should never occur in RMZs.

- * FW-STND-RMGD-00. Permanent roads and trails will be located outside the RMZ.
- * FW-STND-RMGD-00. Existing roads and trails within the RMZ will be evaluated for environmental impacts and decommissioned or relocated outside the RMZ if they are necessary for protection and management of resources.
- * FW-STND-RMGD-00. Livestock grazing practices will limit forage use within the RMZ. If current monitoring reveals limits to achieving desired conditions, additional modifications upon livestock grazing will be imposed or physical exclosures will be constructed to prevent grazing within the RMZ.

Aquatic Ecosystems: AQTC. This section also needs changes to existing Forest-Wide direction and additional Standards and Guidelines to support the Desired Conditions for AQTC.

- * FW-GDL-AQTC-06 should be a Standard. New and reauthorized water withdrawal systems (e.g., impoundments, diversions, and associated ditches) should always require components to prevent entrainment and/or entrapment of fishes and other aquatic organisms.

- * FW-GDL-AQTC-00. Prevent the importation and establishment of aquatic nuisance animals in lakes, reservoirs, and streams.

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- * Post information on invasive species at major boat ramps and trail heads to educate anglers and recreationists on methods of prevention.
- * Cooperate with CPW invasive species inspections.

- * FW-STND-AQTC-00. Permanent roads and trails will be designed and located to avoid sedimentation and pollution of lakes, reservoirs and streams.

- * FW-STND-AQTC-00. Existing roads and trails impacting surface runoff and sediment delivery to aquatic ecosystems will be reconstructed or decommissioned.

- * FW-STND-AQTC-00. Livestock grazing practices will limit damage to stream channel morphology and fisheries habitat. If current monitoring reveals limits to achieving desired conditions, additional modifications upon livestock grazing or physical barriers will be imposed or grazing eliminated from the area.

Native Species Diversity: SPEC. This section lacks the Standards and Guidelines necessary to achieve the Forest-wide Desired Conditions for Native Species Diversity.

General Species Diversity:

- * FW-OBJ-SPEC-03. The objective includes suggested actions to achieve habitat restoration or enhancement for native species. Two actions that need to be included in this Objective are recreational development and transportation/travel management. Both of these actions have significant effects on habitat capability and effectiveness.

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- * FW-STND-SPEC-00. Roads and trails will be designed and located to minimize fragmentation of core wildlife

habitats and security areas, and prevent any alignment with migration routes and corridors.

* FW-STND-SPEC-00. Open road and trail densities and human activities will be reduced in areas where they are causing wildlife habitat fragmentation and displacement of big game from preferred habitats and seasonal concentration areas.

* FW-STND-SPEC-00. Forage utilization levels from livestock grazing will be adjusted to accommodate preparation and recovery of vegetative land treatments.

* FW-DC-SPEC-02: Forage availability is maintained or increased, where capable, and contributes to ecosystem resiliency and forage for nongame species, livestock, and big game. This DC lacks any Objectives, Standards, or Guidelines.

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* FW-GDL-SPEC-00. Competition for forage between livestock and big game will be minimized through proper livestock stocking and management.

* FW-GDL-SPEC-00. Intensive grazing systems and proper use levels for forage utilization will be implemented to maintain or improve range condition, trend and productivity.

* FW-GDL-SPEC-07: Should be a Standard. Seasonal restrictions and buffers to prevent disturbance to nesting birds is an effective measure to prevent the loss or abandonment of an active nest during that season, and should continue to be standard operating procedure. However, they do not prevent the long-term loss of suitable nesting trees or territories. Refer to FW-STD-ECO-00.

Big Game Species:

Suggested modifications to the Desired Condition for Big Game Species is highlighted in the original text:

FW-DC-SPEC-14: Relatively undisturbed areas provide habitat blocks well represented throughout the Forest that provide functional security areas with abundant forage and cover for populations of big game and other species. Habitat blocks and their associated migration and movement corridors are avoided by roads and trails and provide effective cover to allow for relatively unabated movement of big game species across the landscape. See also Chapter 3, Wildlife Management Area section, Ecosystems FW-DC ECO-06, and Native Species Diversity FW-OBJ-SPEC-03.

FW-OBJ-SPEC-00: A complimentary objective for this component of the plan would be to [ldquo]Encourage big game animals to utilize preferred habitats and seasonal concentration areas on public lands[rdquo].

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The supporting Guideline from the Draft Forest Plan would be FW-GDL-SPEC-18: To improve elk distribution, 30[ndash]100% of a sub-watershed should provide wildlife security habitat (patches of >250 acres).

The Desired Conditions and Guidelines need to be further supported by the following Standards and Guidelines:

* FW-GDL-SPEC-00. Develop landscape-level mapping to identify priority blocks of undisturbed habitat and big game security areas and the primary corridors necessary to connect them.

* FW-GDL-SPEC-00. Initiate projects to restore and enhance habitat conditions within the priority habitat blocks and security areas identified.

* FW-GDL-SPEC-00. Prevent permanent road construction and recreational trail development within priority blocks and big game security areas.

* FW-STND-SPEC-00: Vegetation treatments on big game winter range will promote and maintain early seral conditions.

* FW-STND-SPEC-00: Open road and trail density will be minimized and seasonal restrictions on public access and activities will be utilized to prevent disturbance to big game on winter range. See also FW-STD-SPEC-17.

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FW-STND-SPEC-00: Vegetation treatments on big game summer range will provide diverse mosaics of cover and forage, with a majority of the area in cover.

Other modifications and additions include:

* FW-GDL-SPEC-17: Should be a Standard. Seasonal restrictions on activities in big game production areas and winter ranges are effective mitigation measures, and have been standard operating procedure on the GMUG. The seasonal restrictions must also be a Forest-wide Standard that applies to all activities, including recreation activities.

* FW-STND-SPEC-15 would require effective separation between bighorn and domestic sheep on active allotments. This is a good and necessary standard, as one of the biggest threats to wild sheep is transmission of disease from domestic sheep.

Current scientific consensus is that the major threat and limiting factor to expanding bighorn populations is a respiratory disease complex caused by a combination of pathogens carried by domestic sheep. Respiratory disease transmitted from domestic sheep has caused catastrophic all-age die offs and markedly reduced lamb

recruitment in herds throughout the West and in Colorado. Negative effects of a single disease event can last for decades in a herd, resulting in chronic decline or stagnation. Reduced lamb recruitment can occur in herds with low grade infection without suffering die-offs. There is no effective vaccine or treatment available at this time. Separation of bighorns from domestic sheep, especially on historic core bighorn home range is the cornerstone of science-based management efforts and the clear path forward for recovery of the species.

* FW-STND-SPEC-16: would also require effective separation among domestic goats in habitat occupied by bighorn sheep, and prohibit the use of recreational pack goats and the use of goats and sheep for invasive and/or noxious weed management.

Current best available science has also confirmed that domestic goats can carry the full load of respiratory pathogens capable of causing catastrophic disease in bighorns. Although disease events in bighorns caused by exposure to domestic goats are less common than domestic sheep, significant risk of disease transmission exists.

At Risk Species

At risk species include federally listed threatened, endangered, proposed and candidate species as well as species of conservation concern. Standards and Guidelines within the Forest Plan should reflect current direction and requirements of recovery and conservation plans for those species, and not be voluntary in nature as described in the Desired Conditions and Objectives. The Forest Service is required by law and regulation to fully evaluate at risk species and to consult with the US Fish and Wildlife Service on effects to federally listed, proposed and candidate species, which should also be included as a Standard in the Plan.

Conservation Watershed Network

We fully support the concept of conservation watershed networks to help restore and maintain native greenback cutthroat trout and boreal toads. This will continue to support past and existing efforts to coordinate with CPW on management efforts to restore those species on the GMUG.

However, there does not appear to be any similar emphasis or direction in the draft plan for other resident trout such as rainbow, brown, or cutthroat trout. There are Desired Conditions, Objectives and associated Guidelines in the section on Aquatic Ecosystems related to fish habitat, water quality, and direct mortality but nothing about resident trout population objectives or guidelines. We believe the forest plan should also include an emphasis and management direction for populations of this group of aquatic species.

As we have commented before, and the GMUG has acknowledged, the Forest provides high quality habitat and abundant opportunities for fishing. Private and guided fishing on the Forest is a significant activity and economic benefit to our local economies and should be emphasized as a key ecosystem characteristic and recognized as an important multiple use and ecosystem service in Part III of the forest plan.

Part III - Multiple Uses and Ecosystem Services of the Forests

Transportation System (TSTN)

We support the Desired Conditions and Standards included in the section on Transportation System. These are long-standing goals and objectives for the Forest, as well as standard operating procedures for travel management. Effective closures are a continual challenge and must be designed and implemented to prevent resource damage and all forms of unauthorized use.

Lands and Special Uses (LSU)

One of the primary missions of Backcountry Hunters & Anglers is to advocate for legal access to our public lands and waters. The draft plan provides a guideline to address this at FW-GDL-LSU-05: To improve accessibility for the public, road and trail rights-of-way acquisitions meeting at least one of the following criteria should be prioritized:

- * Identified as a priority by and in cooperation with local governments and State and Federal agencies, and/or
- * Improves access for recreationists including hunting, fishing, and trail users.

We would like to see this guideline expanded to include improved access to other public lands and waters adjacent to the boundaries of the GMUG, including BLM, State Trust Lands, and State Wildlife Areas.

That said, we do not advocate for additional roads and trails into those areas for hunting and fishing. We are looking for improved legal access to our public lands and waters. Our adventures start where the roads and trails end.

Range (RNG)

Suggested modifications to the Desired Condition for Range is highlighted in the original text:

FW-DC-RNG-01: Livestock grazing and its associated activities occur on suitable rangelands under current allotment management plans. These activities contribute to the stability and social, economic, and cultural aspects of rural communities while maintaining or achieving desired ecological conditions. See Native Species Diversity FW-DC SPEC-02 and Socioeconomics FW-DC-SCEC-01.

In addition to the Standards included in the preliminary draft plan, many of the draft Guidelines need to be elevated to Standards including the following:

- * FW-GDL-RNG-08: limit or prevent concentrated livestock use in riparian management zones and wetland-upland interfaces.
- * FW-GDL-RNG-09: implement allowable forage utilization levels in accordance with Rangeland Analysis Training Guide, 1996, and the Colorado Rangeland Monitoring Guide, 2014.
- * FW-GDL-RNG-10: manage season and duration of use.
- * FW-GDL-RNG-11: location and duration of use of sheep bed grounds.
- * FW-GDL-RNG-12: Provide wildlife escape ramps at water troughs and require wildlife-friendly fence design.
- * FW-GDL-RNG-15: location of water developments to avoid impacts

These are all standard management practices and design features that have been implemented on rangelands throughout the West and should be standard operating procedures specified as Standards in the forest plan.

Additional standards and guidelines that should also be included for Range are:

- * FW-STND-RNG-00: Forage utilization levels will retain vegetative stubble sufficient to maintain cover and litter to protect soils and provide forage for wildlife at the end of the grazing season.
- * FW-STND-RNG-00: During and after periods of severe drought, Forest Service rangeland management specialist(s) will adjust the timing, frequency, stocking and/or intensity of livestock grazing to prevent long-term impacts to vegetation and soils.
- * FW-STND-RNG-00: Rangeland management specialist(s) will utilize Risk of Contact models to identify areas where domestic sheep grazing is in alignment with occupied bighorn sheep habitat and provide effective separation between bighorn and domestic sheep on active allotments (see FW-STND-SPEC-15).

Recreation (REC)

Beginning with the public scoping period in May of 2018, we have expressed our concerns over the magnitude and scale of recreational trail development and activities on the GMUG and our adjacent public lands, and the impacts it is having on our remaining roadless areas and backcountry fish and wildlife habitats. The existence of recreational trails and hunting and fishing are not compatible in many areas of the Forest and we consider this to be a key need for change in management direction for the GMUG. The forest should plan for increased recreational trail development that prevents impacts to our backcountry and concentrates development in areas close to communities where open road and trail densities and human activities are already high. Development of travel management plans should be based upon landscape-scale strategy that provides for the retention and enhancement of large blocks of intact landscapes that provides for the seasonal habitat needs of wildlife.

The preliminary draft includes two Desired Conditions for recreation on the GMUG along with supporting Objectives, Guidelines, and Standards. In addition, the GMUG is proposing their [ldquo]Desired ROS (Recreation Opportunity Spectrum) for winter and summer[rdquo] in map form in Appendix 1. Currently, Forest-wide direction for recreation and the Desired ROS does not fully integrate recreation with other activities and uses of the Forest as stated in FW-DC-REC-02.

In general, we think there are other Desired Conditions for recreation that would improve integration with other activities and uses while preventing impacts to other resources on the Forest, and the Desired ROS is weighted too heavily on Semi-primitive motorized and Semi-primitive non-motorized recreation and should have more Primitive recreation designated outside established wilderness.

FW-DC-REC-00: Recreation is integrated with other resource values and multiple uses of the Forest. Trail development avoids lands identified as Colorado Roadless Areas, big game seasonal concentration areas, security areas and migration corridors, and is limited within Primitive and Semi-Primitive ROS settings.

* FW-GDL-REC-00: Trail development is concentrated in areas close to communities where open road and trail densities and human activities are already high. Development of travel management plans are based upon landscape-scale strategy that provides for the retention and enhancement of large blocks of intact landscapes that provides for the seasonal habitat needs of wildlife.

* FW-STND-REC-00: Trail development is emphasized in Rural, Roaded Natural and Rural ROS settings as well as High-use Recreation Management Areas (MA4.2) and Mountain Resorts (MA4.1)

* FW-STND-REC-00: Open road and trail density and designated recreational use within Semi-Primitive Motorized and Non-motorized ROS settings will be determined through site-specific travel management plans.

* FW-STND-REC-00: Electric-assist bicycles (e-bikes) will be authorized on open roads and motorized trails only

* FW-STND-REC-00: Colorado Roadless Areas (MA3.1) and Wildlife Management Areas (MA3.2) will have minimal trail development or be managed for Primitive ROS.

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FW-STND-REC-00: Minimize trail development and designate snowmobile routes within big game winter range. Utilize seasonal area closures to mitigate disturbance from winter recreation activities.

Timber and Other Forest Products (TMBR)

The preliminary draft forest plan includes Desired Conditions for timber and other forest products on the GMUG along with supporting Objectives, Guidelines, and Standards. In addition the Forest has revealed its determination of [ldquo]Lands that may be suitable for timber production[rdquo] in Appendix 8.

I have been actively involved in forest health issues and timber management in the State of Colorado and on the GMUG, representing BHA on the Adaptive Management Group for the SBEADMR project, and providing comments on other timber sale proposals. Based on that experience, I believe that the Desired Condition for Timber should include the following:

FW-DC-TMBR-00: Timber sales respond to insect and disease outbreaks and salvage of trees burned in wildfires where they occur on lands suitable for timber production.

* FW-OBJ-TMBR-00: Salvage of dead and dying trees that are within [frac12] mile of existing system roads are high priority for harvest.

* FW-OBJ-TMBR-01: Aspen timber sales would focus on stands that are capable of regenerating and can be protected from livestock browsing on active allotments.

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* FW-STND-TMBR-02: Defines the maximum size of allowable clearcuts in aspen, and proposes an increase to 100 acres. Based on my experience there is no need to increase this limit from 40 to 100 acres. Without any standards for unit juxtaposition or uncut buffers, the same effect can already be achieved under the current limit. If necessary you can get regional forester approval to exceed the 40 acre limit.

* FW-STND-TMBR-00: Avoid cutting aspen on active sheep allotments and high-use cattle allotments unless the regeneration is protected by fencing.

FW-DC-TMBR-00: Timber sales are utilized as a tool to reduce fuel loadings and fire hazard of fire-dependent ecosystems within the Wildland Urban Interface where structures and/or energy facilities are present.

* FW-STND-TMBR-04: Timber shall not be harvested for the purpose of timber production on lands not suited for timber production. Timber harvest may occur on these lands for purposes other than timber production. See Appendix 8 [ndash] Timber Suitability Analysis.

Appendix 8 defines timber production as [ldquo]the purposeful growing, tending, harvesting, and regeneration of regulated crops of trees to be cut into logs, bolts, other round sections for industrial or consumer use[rduo].

When we examine the maps of lands suitable for timber production, we have noticed a few instances where we question that determination. The Little Cone on the Norwood Ranger District is a prime example. During SBEADMR, this area was identified as a potential treatment area. In 2017 the district acquired access to the Little Cone across a large tract of private land to do 80 acres of salvage/thinning treatments under the Good Neighbor Authority. The intent of the sale was to improve resistance of the spruce forest to further spruce beetle activity.

That goal has been achieved, but there is no intent to intensively manage Little Cone for timber production. The access across private land is temporary, as are the temporary roads constructed to harvest timber. This area should be classified as not suited for timber production, and under FW-STND-TMBR-04, tree harvest could proceed for other purposes.

This situation needs to be evaluated for other areas of the Forest. It obviously would apply to most of the Management Areas outside of General Forest (MA5), and areas identified in Step 2 [ndash] Suitable timber with consideration of compatibility with other Desired Conditions and Objectives.

Chapter 3 [ndash] Management Area Direction

Wilderness and Areas where Natural Processes Dominate (MA 1)

We agree entirely with the stated Desired Conditions, Objectives, Standards and Guidelines for Wilderness and Areas where Natural Processes Dominate (MA 1). These areas are the gold standard for fish and wildlife habitat and backcountry hunting and fishing opportunities. These designated and potential wild lands must retain their wilderness character for us and future generations.

Recommended Wilderness - MA 1.2 (RECWLD)

The preliminary draft includes approximately 22,400 acres recommended for wilderness across the entire GMUG, all of it in areas contained within the San Juan Wilderness bill. While we enthusiastically endorse this

wilderness bill, the preliminary draft ignores tens of thousands of acres that were recommended by the GMUG in 2006 in the last public revision process, as well as endeavors such as the Community Conservation Proposal and the Gunnison Public Lands Initiative.

We provided specific comments on the Wilderness Evaluation to the GMUG planning team in September of 2018. Members of BHA have also been actively involved in all of the community-based initiatives and continue to advocate for additional land conservation and wilderness designation. The forest plan needs to seriously consider the wilderness proposals we have recommended and within these initiatives and include them in the lands Recommended for Wilderness (MA1.2).

Natural Areas with Focused Management (MA 3)

Colorado Roadless Areas - MA 3.1 (CRA)

As stated in the preliminary draft [ldquo]management within Colorado Roadless Areas will be consistent with the Colorado Roadless Rule, 36 CFR 294 Subpart D - Colorado Roadless Area Management[rdquo]. The preliminary draft includes one Desired Condition (MA-DC-CRA-01) for Colorado Roadless Areas but no supporting Objectives, Standards or Guidelines other than referencing the final rule. It is vitally important to reflect the provisions of the final rule in accompanying plan direction, and to include additional direction to meet the other resource values and objectives specific to the GMUG.

We suggest the following additions:

* MA-OBJ-CRA-00: Tree harvest and permanent road construction are prohibited within Colorado Roadless Areas except for local access or management provisions in the final rule:

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* To reduce fire hazard in WUI

* To access and maintain energy and water infrastructure

* To access some coal reserves in North Fork Valley

* MA-OBJ-CRA-00: Colorado Roadless Areas are integrated with Desired Conditions for Ecosystem Integrity and Species Diversity

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* MA-STND-CRA-00: Colorado Roadless Areas are prioritized for retention of key ecosystem characteristics and functional terrestrial habitats.

* MA-STND-CRA-00: Colorado Roadless Areas are highlighted for retention of core wildlife habitats and big game security areas.

* MA-STND-CRA-00: Recreational trail development is minimized within CRA[squo]s to maintain roadless area qualities and solitude.

* MA-STND-CRA-00: Colorado Roadless Areas (MA3.1) will have minimal trail development or be managed for Primitive ROS.

Wildlife Management Area - MA 3.2 (WLDF)

We appreciate the Forest Service response to our desire to see Wildlife Management Areas designated in the forest plan, and to develop proactive management direction for these areas. The draft plan has one Desired Condition and one Standard for Wildlife that focuses on providing large, relatively intact and undisturbed blocks of habitat, and would require no net gain in system routes to meet this objective. The draft plan provides accompanying maps of the size and location of the proposed Wildlife Management Areas.

We think this is a good start in addressing this issue, but the direction and results of the draft plan need to be significantly expanded to provide meaningful conservation of wildlife habitats and populations.

The draft plan includes the following Desired Condition:

MA-DC-WLDF-01: Large blocks of diverse habitat are relatively undisturbed by routes, providing security 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. See also Native Species Diversity FW-OBJ-SPEC-03.

This Desired Condition should be supplemented or replaced by the Forest-Wide Desired Condition we have recommended for Big Game, as modified:

FW-DC-SPEC-14: Relatively undisturbed areas provide habitat blocks well represented throughout the Forest that provide functional security areas with abundant forage and cover for populations of big game and other species. Habitat blocks and their associated migration and movement corridors are avoided by roads and trails and provide effective cover to allow for relatively unabated movement of big game species across the landscape.

The draft plan includes the following Standard:

MA-STND-WLDF-02: To provide security habitat for wildlife species by minimizing impacts associated with roads and trails, there shall be no net gain in system routes, both motorized and nonmotorized, where areas are already in exceedance of the 1 mile per square mile limit⁸ as calculated within this management area boundary. Within the Flattops Wildlife Management Area on the Gunnison Ranger District, there shall be no new trail development. Exception: this does not apply to administrative routes.

The concept of no net gain in system routes, with an objective of 1 mile per section, is an adequate Standard where open road and trail density is at or below that objective, but not where it already exceeds 1 mile per section. We believe this is more appropriate as an objective rather than a standard, and include additional standards as follows:

- * MA-STND-WLDF-00: Route decommissioning and area closures will be utilized to reduce habitat fragmentation and disturbance where route density exceeds 1 mile per section.
- * MA-STND-WLDF-00: Roads and trails will be designed and located to minimize fragmentation of core wildlife habitats and security areas, and prevent any alignment with migration routes and corridors.
- * MA-STND-WLDF-00: Open road and trail densities and human activities will be reduced in areas where they are causing wildlife habitat fragmentation and displacement of big game from preferred habitats and seasonal concentration areas.
- * MA-STND-WLDF-00: Minimize trail development and designate snowmobile routes within big game winter range. Utilize seasonal route and area closures to mitigate disturbance from winter recreation activities.

We believe there are numerous other places on the GMUG besides the Flattops Wildlife Management Area where there should be no new trail development, and the following Standard should apply to all Wildlife Management Areas:

- * MA-STND-WLDF-00: Colorado Roadless Areas (MA3.1) and Wildlife Management Areas (MA3.2) will have minimal trail development or be managed for Primitive ROS.

We support the current Wildlife Management Areas identified in the draft plan but we believe there are additional areas that need to be included to achieve the desired conditions for wildlife.

We fully support and agree with the Colorado Parks and Wildlife identification and rationale of CPW Wildlife Emphasis Areas previously submitted to the GMUG planning team by the Southwest Region Office (October 1,

2018). The Wildlife Emphasis Areas (WEA[rsquo]s) were identified by local District Wildlife Managers and Area wildlife staff and represent specific geographic areas of great importance on the GMUG that are critical to maintaining robust wildlife populations.

When we compare the maps from the draft plan with those from the CPW report, it is apparent that very few of the Wildlife Emphasis Areas (WEA[rsquo]s) identified by CPW are included as Wildlife Management Areas in the draft plan. However, some of the WEA[rsquo]s also coincide with Colorado Roadless Areas, Areas to be analyzed as Wilderness, or Special Interest Areas that could be managed for their wildlife habitat and primitive character as we have suggested above. The primary concern lies within the General Forest Management Area, particularly on the Uncompahgre Plateau/Naturita Division, Grand Mesa, and the western San Juan Mountains.

This is where we need to continue to work with the Forest Service and the CPW to designate additional Wildlife Management Areas, or adopt the additional Desired Conditions, Objectives, Standards and Guidelines we have outlined to provide more emphasis on the retention of our remaining wild lands and conservation of wildlife habitat.

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Backcountry Hunters & Anglers

The Sportsman's Voice for Our Wild Public Lands, Waters and Wildlife

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