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Organization: Colorado Offroad Trail Defenders
Title: Vice President
Comments: GMUG Forest Plan Comment Addendum

Patrick McKay, Esq.

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October 29, 2021

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We strongly oppose the Wildlife Management Areas in Alternative B, and particularly oppose the arbitrary route density standards which have no basis in science. We endorse the comments of COHVCO / TPA on this issue, quoted below:

? Alternative B would designate up to 740,000 acres of wildlife habitat on the Forest, but fails to explain why these areas were designated. Based on commercially available information from CPW much of these areas are not habitat. Simply drawing these areas on a map does not make them habitat and there remains large tracts of habitat outside these areas and the US Supreme Court recently struck down this type of arbitrary management processes.

? Current planning provides for management based on habitat effectiveness, which mirrors many other agencies' management for healthy ecosystems or attempting to address many issues, such as drought, fire and beetle impacts to benefit all phases of habitat. Many factors entirely unrelated to route density will negatively impact habitat

effectiveness, such as the reintroduction of wolves in Colorado. While this challenge is totally unrelated to route density, these factors will not be addressed in the management of habitat areas as the primary tool will be route density.

? The route density standard concept starts from the utterly incorrect position that routes and recreation are the only factors impacting habitat and wildlife populations. Alt B&D remove habitat effectiveness and provide 1 mile of trail per mile is proposed for a significant portion of forest. There is no basis for standard or why the standard could not be 2 miles of trail per square mile. Upper tier roadless designations discussed 2 miles of trail per square mile and that was dropped due to huge negative impacts to recreation and the arbitrary nature of the standard. Also how does this standard relate to large open areas that the USFS just recognized as highly sought after and valuable in the development of the winter travel rule?

? What basis is there for the landscape level application of the 1 mile per mile trail and route density requirement? We are opposed to the arbitrary nature of the standard as the GMUG has approved route densities of up to almost 5x this density in ESA habitat areas and critical watersheds.

? This type of standard is in direct conflict with new USFS guidance regarding trails and wildlife and also conflicts with new Parks and Wildlife Guidance the document claims to be implementing.

We concur with TPA on these points. We are also concerned that even though Forest staff asserted that route density limits in WMAs would not be used to require closure of existing designated routes, that could happen anyway. While the main standard establishing the route density limit only applies to new routes, WMAs also have the following objective:

MA-OBJ-WLDF-03: Within five years, identify potential area-specific management actions

for each wildlife management area to improve habitat connectivity with respect to existing route densities and to achieve desired ecological conditions for constituent ecosystems.

Within 10 years of plan approval, complete one action in each wildlife management area.

This objective appears to apply the route density limits for new routes to existing routes and encourages closing existing designated routes in order to improve connectivity and bring areas that exceed them under the density limits. If Forest staff are sincere in their assertion that the route density limits in WMAs will not be used to close existing routes, then explicit language needs to be added stating that these route density limits shall not be used to require closure of existing routes.

We also urge the Forest to require specific methods for calculating route density, which should be done based on an entire WMA rather than overlaying arbitrary grid lines on WMAs and calculating density based on individual grid squares. Calculating density based on the total area of individual WMAs is more objective than using grid lines, which could skew the result simply based on their location.

Ultimately however, we believe the WMAs in Alternative B are unnecessary and unsupported by the best available science. If the ROS maps for Alternative C are corrected, we would support that alternative over Alternative B because it has fewer WMAs.

We also urge the removal of the arbitrary route density standard from the final Forest Plan. Any standard regarding route density should follow the best available science and be clearly supported in the scientific literature. As TPA points out, the proposed 1 mile standard is inconsistent with existing route density guidelines for various species and there is no single number that applies to all species. At minimum therefore, the density limit must vary depending on the specific species a given WMA is being managed to protect. The one-size-fits-all standard must be eliminated.

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[Greenback cutthroat trout: Permitted route density 4.78]

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