

Data Submitted (UTC 11): 10/26/2023 6:00:00 AM

First name: Craig

Last name: Grother

Organization: CO Backcountry Hunters & Anglers

Title: Central West Slope Regional Director

Comments: Attached are documents submitted on behalf of the Colorado Chapter of Backcountry Hunters & Anglers Objecting to portions of the FEIS and ROD for the Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision #51806

[See Attachments]

Regional Forester Frank Beaum, Reviewing Officer

Attn: Objections

USDA Forest Service, Rocky Mountain Region

1617 Cole Blvd.

Lakewood, CO. 80401

Re: Objection letter for the GMUG National Forests Revised Land Management Plan and Final Environmental Impact Statement #51806. Forest Supervisor Chad Stewart, Responsible Official.

Name of the Objector

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Submitted on behalf of the Colorado Chapter of Backcountry Hunters & Anglers

This objection includes two issues related to the Revised GMUG Forest Plan. Statements are provided below with reference to comments previously submitted by Colorado Backcountry Hunters & Anglers (BHA) and Colorado Parks and Wildlife (CPW).

1. The Preferred Alternative fails to provide adequate management direction for the protection of CPW-mapped high priority big game habitats and Roadless character of designated Colorado Roadless Areas located outside Wildlife Management Areas.

Most of the Colorado Roadless Areas included in the Preferred Alternative overlap some or all of the designated Wildlife Management Areas (WMAs) and would be managed under the combined plan components for both Management Areas. However, the Preferred Alternative does not include any plan components for stand-alone Roadless Areas beyond the management direction included in the Colorado Roadless Area Rule (MA 3.1 FP direction p 117), and in fact identifies them as areas suitable for further trail development (FEIS page 33).

Our analysis demonstrates that the Roadless Areas on the GMUG encompass numerous CPW-mapped high priority big game habitats such as winter concentration areas, summer concentration and production areas, and migration routes connecting seasonal use areas within and adjacent to each Roadless Area. We have also determined that most Roadless Areas on the GMUG currently have motorized and/or mountain bike trails or designated snowmobile routes within their boundaries. Without additional plan components specified for Colorado Roadless Areas, those areas would not be fully managed to retain their Roadless character or achieve the Desired Conditions for wildlife and primitive backcountry settings, and would likely continue to be impacted by future trail development.

Backcountry Hunters & Anglers (BHA) commented extensively on the value of Colorado Roadless Areas to sustain high priority big game habitats, wildlife habitat connectivity, and backcountry hunting and fishing opportunities, and the need to limit recreational trail development to conserve those values. 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.

For reasons stated above, Backcountry Hunters & Anglers object to the lack of substantive Management Area direction for Colorado Roadless Areas (MA 3.1) and request the Reviewing Officer require additional plan components within MA 3.1 that will limit trail density and direct future trail development away from Roadless Areas and CPW-mapped high priority big game habitats.

Backcountry Hunters & Anglers (BHA) has previously submitted the following formal comment letters and independent analysis of Wild Lands and Wildlife habitat during the GMUG Plan Revision process as well as formal comment letters from Colorado Parks and Wildlife (CPW) including substantive comments on Colorado Roadless Areas:

- \* BHA comments to GMUG Scoping [ndash] 5/24/18

- \*

- \* Detailed comments on the values of CO Roadless Areas and need for specific management direction to emphasize conservation of wildlife & backcountry by limiting recreational trail development

- \* BHA comments on Preliminary Draft Plan [ndash] 7/27/19

- \* Detailed comments reemphasizing the values of CO Roadless Areas and need for specific management direction to emphasize conservation of wildlife & backcountry by limiting recreational trail development

- \* BHA GMUG Wildlands and Wildlife report [ndash] 3/21

- \* [https://www.backcountryhunters.org/grand\\_mesa\\_uncompahgre\\_gunnison\\_usfs\\_report](https://www.backcountryhunters.org/grand_mesa_uncompahgre_gunnison_usfs_report)

- \* Report includes an extensive narrative on the wildlife and backcountry hunting & fishing values of CO Roadless Areas and an analysis of the integrity of CPW-mapped high priority big game habitats and primitive or semi-primitive settings within CO Roadless Areas as affected by existing summer and winter trails

- \* GMUG Draft LMP Sporting Group Recommendations [ndash] 11/23/21

\* Co-written by BHA and TRCP (Theodore Roosevelt Conservation Project)

\* Detailed recommendations for management direction of CO Roadless Areas and the rationale for the necessity to conserve their intended values

\* DNR/CPW comments on Draft LMP [ndash] 11/23/21

\* CPW provided extensive support for conservation of CO Roadless Ares and detailed recommendations for additional management direction.

1. Failure to include all or portions of Wildlife Management Areas (WMAs) recommended by Backcountry Hunters & Anglers (BHA) in the Preferred Alternative, and the lack of substantive Forest-wide and other Management Area direction to avoid, minimize, and mitigate impacts to CPW-mapped high priority big game habitats from existing and future trail development.

Backcountry Hunters & Anglers recognize the increasing trend in recreational development and use on the GMUG and surrounding BLM public lands is significantly impacting the integrity of our remaining wild lands and wildlife habitats. We strongly believe it is urgent to address the cumulative impacts of recreation during forest plan revision and purposely direct management toward the conservation of our remaining wild lands and wildlife habitats that are essential to perpetuating our wildlife populations, and upon the ability to sustain our hunting opportunities and the economic benefits to our local communities.

The forest plan acknowledges these concerns and has identified the need to provide a balance between increased recreation and existing wildlife habitat and backcountry hunting opportunities as one of the Primary Issues. One of the principal methods to respond to this issue has been through designation of Wildlife Management Areas (WMAs); (FEIS Issue #3, p33).

Early in the planning process, Colorado Parks and Wildlife (CPW) pulled together their species habitat maps and personal knowledge and experience of District Wildlife Managers and Area wildlife biologists to recommend important wildlife areas to be included as WMAs. BHA also did an intensive review of CPW-mapped high priority big game habitats and the best available science and utilized our personal knowledge of the GMUG to complete an analysis of big game habitats, production areas, and migration corridors in relation to existing roads and trails and built upon CPWs recommendations for WMAs.

Several of the WMAs recommended by BHA, or critical portions of WMAs, are not included in the Preferred Alternative. In some cases, the Preferred Alternative has designated these recommended WMA polygons as Colorado Roadless Areas where they exist, and in other areas all or portions of those recommended WMAs are designated as General Forest and Rangeland. The Preferred Alternative affects 13 WMAs recommended by BHA, removing any limit on route density or other suggested plan direction and relies solely on Forest-wide or Management Area direction for Colorado Roadless Areas to avoid and mitigate impacts to wild lands and wildlife from existing and future trail development.

Specific areas affected and their associated high priority big game habitats are summarized in the following table:

| BHA Recommended WMA | CO Roadless Area Included | Status in Preferred Alternative | CPW-Mapped High Priority Big Game Habitats Located Within Recommended WMA |
|---------------------|---------------------------|---------------------------------|---|
|---------------------|---------------------------|---------------------------------|---|

|   |   |         |                  |
|---|---|---------|------------------|
| Plateau North   | Unaweep, Calamity Basin, Long Canyon, Johnson Basin                           | 88% WMA | 12 % CO Roadless |
| Elk winter range, winter concentration, summer concentration, production areas, migration routes. | Deer summer range, winter & severe winter range, migration corridors & routes |         |                  |

|   |           |                  |  |
|---|-----------|------------------|--|
| Dominguez   | Dominguez | 100% CO Roadless | Elk winter range, summer range, summer concentration, production areas, migration routes |
| Deer summer range, winter range, winter concentration & severe winter range, migration routes |           |                  |  |

McKenzieNo89% General Forest & Rangeland11% WMAElk winter range & winter concentration, summer range & summer concentration, production areas, migration routesDeer summer range, winter range & severe winter rangeGunnison sage grouse suitable habitat

Spring CreekNo100% General Forest & RangelandElk winter range, summer range & summer concentration, migration routesDeer summer range winter range & winter concentration migration corridor

Naturita DivisionNaturita Canyon54% General Forest & Rangeland46% WMA/CO RoadlessElk winter range & winter concentration, Migration corridorDeer summer range, winter range & severe winter range, migration corridorGunnison sage grouse suitable habitat

Lone ConeNo75% WMA25% General Forest & RangelandElk summer range & summer concentration, production areas, migration routesDeer summer range migration corridor and routes

DallasWhitehouse Mountain57 % Recommended Wilderness33% General Forest & Rangeland10% CO RoadlessElk summer range, summer concentration, production areas, migration routesDeer summer range migration routesRM bighorn sheep summer range & summer concentration, winter range, migration routes

HaydenNo100% General Forest & RangelandElk summer range & summer concentrationDeer summer range

Cimarron/Big BlueCimarron RidgeTurret RidgeLittle CimarronFalls Creek/Soldier Creek56% WMA23% CO Roadless21% General Forest & RangelandElk summer range & summer concentration, production areas, winter range & winter concentration migration routesDeer summer rangeRM bighorn sheep overall range, summer range & summer concentration

Crystal PeakCrystal Peak100% CO RoadlessElk summer range & summer concentration, production areas, migration corridor. Winter concentration area at Carson.Deer summer range, migration corridorRM bighorn sheep summer range & summer concentration, production area, winter range, migration corridor

CataractCataractCarson91% CO Roadless9% General Forest & RangelandElk summer range & summer concentration, production areas, migration corridorDeer summer range, migration corridorRM bighorn sheep summer range, winter range & winter concentration, adjacent to production areas

SunsetSunset100% CO RoadlessElk summer range & summer concentration, production areas, winter range & winter concentration, migration corridorDeer summer range, winter range & winter concentration, migration corridor

SunnysideSunnyside100% CO RoadlessElk summer range extending into White River NF, Winter range extending into Plateau Valley winter concentration areas, migration routesDeer summer range, migration routes to winter range extending into Plateau Valley. RM bighorn sheep summer range & summer concentration, production areas. Winter range extending to White River NF. Migration routes

Backcountry Hunters & Anglers object to the omission of all or critical portions of the recommended WMAs and associated management direction suggested by BHA and others from the Preferred Alternative. We have repeatedly specified our concerns with the omission of all or parts of our recommended WMAs in our previous comments. In addition we object to the rationale used by the Responsible Official excluding these areas as WMAs in the Preferred Alternative.

The best available science supports route density standards to maintain wildlife habitat function within high priority big game habitats. In addition, the route density standard supports the conclusions and management recommendation put forth by the U.S. Forest Service on Sustaining Wildlife with Recreation on Public Lands (Miller et al 2020) including: minimizing recreational overlap of important habitat, implementing buffer zones, maintaining large un-fragmented landscapes, maintaining connectivity between habitat patches, reducing noise and visual disturbance, and consolidating recreational use.

The areas recommended as Wildlife Management Areas require additional conservation in regard to route density, retaining big game security areas, and vegetation management objectives to maintain functional habitat and connectivity to support animal movements. We request additional review of these areas by the Reviewing

Official for consistency with the best available science and the Key Issues identified in the FEIS, and provide a determination of the adequacy of Forest-Wide or Management Area direction for General Forest and Rangeland and/or Colorado Roadless Areas in achieving a balance between increased recreation and existing wildlife habitat and backcountry hunting opportunities.

Backcountry Hunters & Anglers (BHA) has previously submitted the following formal comment letters and independent analysis of Wild Lands and Wildlife habitat during the GMUG Plan Revision process as well as formal comment letters from Colorado Parks and Wildlife (CPW) including substantive comments on Wildlife Management Areas (WMAs) on the GMUG:

- \* BHA GMUG Wildlands and Wildlife report [ndash] 3/21
- \* [https://www.backcountryhunters.org/grand\\_mesa\\_uncompahgre\\_gunnison\\_usfs\\_report](https://www.backcountryhunters.org/grand_mesa_uncompahgre_gunnison_usfs_report)
- \* Report includes an interactive mapping program for big game seasonal concentration areas, production areas, migration routes and corridors and their relationship to existing roads and trails to identify potential areas to prioritize as WMAs.
- \* The report also contains a detailed table of the presence of those priority habitats within the recommended WMAs, as well as any CO Roadless Areas present and current travel management on the GMUG
  
- \* GMUG Draft LMP Sporting Group Recommendations [ndash] 11/23/21
- \* Co-written by BHA and TRCP
- \* Includes an endorsement of the WMAs recommended by CPW and BHA as well as recommended management direction.
- \* Provides specific comments and management recommendations on the 13 affected WMAs included in the Draft Plan.
  
- \* DNR/CPW comments on Draft LMP [ndash] 11/23/21
- \* CPW provided very similar recommendations to WMA boundaries and management in their comments on the Draft Plan.

[Picture of signature Craig Grother]

Craig Grother

Central West Slope Regional Director

Backcountry Hunters & Anglers