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Regional Forester Frank Beum

USDA Forest Service Rocky Mountain Region 1617 Cole Blvd., Lakewood, CO 80401

RE: Objection to the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests Revised Land Management Plan (RLMP) #51806.
Responsible Official:
Forest Supervisor Chad Stewart

Grand Mesa, Uncompahgre, and Gunnison National Forests Headquarters 2250 South Main Street, Delta, CO 81416

Name of Objector:

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To whom it may concern:

I submit these comments on behalf of the Theodore Roosevelt Conservation Partnership (TRCP), a national non-pro?t conservation organization working to guarantee all Americans quality places to hunt and ?sh. The TRCP works with 63 diverse partner organizations and represents over 120,000 individual members nationally, including over 6,000 individuals who call Colorado home. Our members and partners, as well as communities and businesses that rely on wildlife-related income, bene?t greatly when the US Forest Service (USFS) utilizes the best available science to design and implement best management practices to conserve, connect, restore, and properly manage important wildlife habitats while supporting sustainable, responsible recreation.

Hunting, ?shing, and watchable wildlife contribute $5 billion in economic output each year in Colorado and support 40,000 jobs across the state.1 Hunting, ?shing, and wildlife viewing are also a core component of Colorado's culture, pride, and appeal to residents and tourists alike. Reduction, fragmentation, disruption, overuse, and development of important wildlife habitats on public lands, however, can result in local wildlife population declines and ecosystem degradation. Not only does this impact hunters and anglers, it also adversely a?ects other Forest users' quality of experiences, and local businesses that bene?t from wildlife-related visitation.

It is critical that the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) carefully manage wildlife habitat to minimize impacts from vegetation management, commercial timber, wild?res, authorized and unauthorized recreational trails and camping areas, roads, and other year-round recreational and industrial

activities. The TRCP has provided the comment letters below to the GMUG in support of the aforementioned priorities, and identi?ed opportunities for plan improvements on:

* November 23, 2021, on the Draft RLMP: GMUG DRLMP Sporting Group Recommendations_112321
* June 2, 2021, on the Working Draft RLMP: GMUG Working Draft Sporting Group Comments_06022021 ?nal

Our objections to issues in the GMUG Pre-Objection Revised Land Management Plan (RLMP) are grouped into five sections below.

1. The Preferred Alternative is not consistent with current Council on Environmental Quality (CEQ) guidance, USFS policy, and State of Colorado policy because it does not include plan components reflecting the best available science to conserve migration corridors and maintain habitat connectivity for the highest priority CPW-identified and mapped seasonal habitats for migratory ungulates.

On March 21, 2023, the CEQ issued the memorandum: Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors.2 This CEQ Guidance is designed to promote greater habitat connectivity by providing the following direction to Federal agencies:

To the maximum extent practicable, Federal agencies are expected to advance the objectives of this guidance by developing policies, through regulations, guidance, or other means, to consider how to conserve, enhance, protect, and restore corridors and connectivity during planning and decision- making, and to encourage collaborative processes across management and ownership boundaries.

The GMUG planning process is an example of public land planning and management identified specifically in the CEQ Guidance as an opportunity to implement decision-making to advance greater habitat connectivity.

In addition, the USFS 2012 Planning Rule contains specific provisions directing the USFS to incorporate habitat connectivity, landscape scale habitat restoration, and the habitat needs of species used by the public for hunting.3 Consistent with these provisions, on August 19, 2022, Forest Service Chief Moore issued a guidance memorandum to Regional Foresters titled Habitat Connectivity and Migration Corridors in National Forest System Planning and Decisions.4 In this document the Chief asks the Regional Foresters to:

Seek opportunities to enhance migration corridor conservation and connectivity in our national forest system management and collaborations with States, Tribes, private landowners, local governments, non-governmental organizations, and other Federal agencies.

The 2020 Shared Stewardship Agreement between the Forest Service and the State of Colorado also requires "coordinating with local, state, and federal land managers across administrative boundaries - on a landscape-level to maintain, protect, and enhance wildlife corridors and habitat connectivity."5

On August 21, 2019, Colorado Governor Jared Polis signed Executive Order D 2019-011 Conserving Colorado's Big Game Winter Range and Migration Corridors (EO).6 Consistent with this EO, in 2020 CPW updated its Recommendations to Avoid and Minimize Impacts to Wildlife from Land Use Development in Colorado based on the best available science.7 These updated CPW recommendations specify a 1 linear mile per square mile route density limit in migration corridors and the highest priority big game habitats in order to maintain habitat connectivity and function across the landscape. CPW's recommendations were sent to the Regional Forester Frank Beum on November 1, 2021.8 In the transmittal letter CPW notes that:

These recommendations are now CPW policy to guide sta? when commenting on site-speci?c land development proposals. They will also guide our sta? when engaged with the USDA Forest Service (USFS) on NEPA projects, including large scale planning e?orts such as Forest Plan revisions[hellip]

While the Wildlife Management Area (WMA) concept incorporated into the Pre-Objection RLMP was created to promote habitat connectivity on the GMUG, substantive changes to the plan components and approach for limiting route density within WMAs that occurred between the Draft RLMP and Pre- Objection RLMP puts High Priority Habitats within WMAs at risk. Additionally, areas of CPW-mapped High Priority Habitat important for maintaining connectivity also occur outside of the WMAs included in the Pre-Objection RLMP. To resolve our objection on this issue and make the GMUG RLMP consistent with CEQ Guidance, Forest Service Policy, and State of Colorado Policy, we request that the Forest Service incorporate the following plan components:

a) New forestwide Standard to maintain connectivity in CPW-identified and mapped migration corridors and high priority seasonal big game habitats. To maintain consistent landscape-level management prescriptions across public and private administrative boundaries, and to fully maintain and enhance habitat connectivity and the function of CPW-mapped migration corridors and high priority seasonal big game habitats located outside of WMAs consistent with state efforts, incorporate a forestwide Standard consistent with CPW's recommendations with respect to limiting route density to 1 linear mile per square mile in mapped migration corridors and the highest priority big game habitats mapped by CPW.9

b) New forestwide Guideline for maintaining Primitive or Semi-Primitive ROS in the highest priority big game habitats identified by CPW. To maintain the function of CPW-mapped high priority big game habitats consistent with state efforts across the landscape and public/private administrative boundaries, incorporate a Standard requiring that the ROS for the highest priority big game habitats be maintained as "Primitive" or "Semi-Primitive" with route density limits of 1 linear mile per square mile.

c)Change FW-DC-SPEC-12 to a Guideline and incorporate a minimum 250-acre patch size consistent with the best available science referenced in our November 23, 2021 comments and the analysis completed in the Draft EIS. The security area analysis provided in the Draft EIS, Vol 1, p.255 relied on a 250-acre minimum patch size to model habitat connectivity across the forest. Application of FW-DC-SPEC-12 without identifying a minimum patch size will have arbitrary results and is not supported by the EIS analysis. The 250-acre minimum patch size needs to be included in FW-DC- SPEC-12 in order for this plan component function as intended to promote conservation of migration and movement corridors to allow for unabated movements of big game and other species. This Desired Condition should be changed to a Guideline consistent with CEQ Guidance, Forest Service policy, and State of Colorado policy on managing to maintain migration corridors and habitat connectivity.

2. The Preferred Alternative does not include the plan components necessary to maintain the roadless character of Colorado Roadless Areas (CRAs) consistent with the Colorado Roadless Rule.

We request that the Forest Service incorporate additional plan components to maintain the roadless character of CRAs consistent with the Colorado Roadless Rule. High motorized and non-motorized trail densities have been documented to negatively impact and impair the characteristics that de?ne CRAs by Rule, including the diversity of plant and animal communities, and providing functional habitat for species dependent on large, undisturbed areas of land. This is particularly problematic where CRAs overlap with CPW-mapped high priority habitat for migratory ungulates and CPW recommends limiting route densities to 1 linear mile per square mile in order to maintain habitat function and habitat connectivity.13 With this in mind, to resolve our objection we request the following changes and additions to plan components:

1.
1. Change MA-DC-CRA-02 to a Standard. CRAs are de?ned by Rule as having Primitive or Semi- primitive non-motorized and motorized forms of dispersed recreation.14 With this in mind, please change MA-DC-CRA-02 to a Standard to re?ect that the ROS for Colorado Roadless Areas need to be maintained as "Primitive" or "Semi-Primitive" to meet the Roadless Area Characteristics that define Colorado Roadless Areas. A desired condition is not adequate to ensure the maintenance of primitive or semi-primitive ROS over time.

2. Incorporate a new Guideline for evaluating new trail proposals and recreational uses in CRAs for consistency with the Colorado Roadless Rule. Prior to approving new trails or recreational uses in a CRA, existing trail networks and recreational use within the CRA should be evaluated for consistency with the criteria defining roadless characteristics in the Colorado Roadless Rule.15 This should occur regardless of whether the new trails or recreational uses are proposed independently or as part of comprehensive travel management planning within a CRA. New trails, additional snowmobile routes, and other focused route-based recreation within CRAs should not be authorized unless the roadless character of the CRA will be maintained and the CRA will continue to provide semi-primitive and primitive recreation opportunities.

3. Incorporate a new Guideline for limiting route density in CRA's consistent with the Colorado Roadless Rule. We request incorporation of a guideline to re?ect that trail densities in Colorado Roadless Areas should be limited or reduced to the extent necessary to maintain the characteristics that de?ne Colorado Roadless Areas. As noted above, high motorized and non-motorized trail densities are known to impair the characteristics that de?ne Colorado Roadless Areas, including the diversity of plant and animal communities, and providing functional habitat for species dependent on large, undisturbed areas of land - like migratory ungulates.

3. Plan Components for WMAs changed significantly between the Draft and Pre-Objection RLMP. The Preferred Alternative no longer includes plan components necessary to maintain habitat function, provide security habitat, and maintain or improve habitat connectivity in Wildlife Management Areas (WMAs).

GMUG management of WMAs is explicitly intended "to maintain habitat function and provide security habitat for wildlife species" (MA-STND-WLDF-02), with the stated desired condition that "large blocks of diverse habitat are relatively undisturbed by route and associated recreational use, providing security for the life history, distribution, migration, and movement of many species, including big-game species" (MA-DC-WLDF-01). MA-DC-WLDF-01 also expresses the desire to "maintain or improve" habitat connectivity. Significant changes to the foundational components of WMA management between the Draft RLMP and the Pre-Objection RLMP completely change the anticipated outcomes and risks associated with the management actions proposed. The Forest Service's justification for these changes is not based on the best available science for maintaining habitat connectivity within WMAs. With this in mind, to resolve our objection we request the following changes and additions to plan components:

1.
1. Modify MA-DC-WLDF-01 to require reducing, instead of only restricting, habitat fragmentation by routes within WMAs where high route densities already impair habitat connectivity. In the Draft LMP, the GMUG had intended to reduce fragmentation by routes to maintain or improve habitat connectivity under MA-DC-WLDF-01, however, in the Pre-Objection RLMP the GMUG has diminished this desired condition. Of the WMAs listed in Table 98 (in EIS Volume 1, Chapter 3) for the Preferred Alternative, 26 out of 57 WMAs have a baseline TerraTrails route density of 1.0 or greater, representing 162 miles of routes exceeding the 1 linear mile per square mile target. Both CPW's and TRCP's comments on previous versions of the RLMP highlight the adverse impact that trail densities greater than 1 linear mile per square mile have on habitat use and habitat connectivity for migratory ungulates. Where habitat fragmentation is problematic and prohibiting wildlife use, distribution, migration, or movement within WMAs, the GMUG should reduce habitat fragmentation by reducing routes. If the GMUG opts to not reduce routes where fragmentation by routes degrades habitat connectivity and the use of that habitat, then the stated purpose of WMAs is not achieved.
2. Modify MA-STND-WLDF-02 to apply a management philosophy based on the theory of habitat permeability and the research that supports low-density development and activity; remove the direction to concentrate "new trail development[hellip] near existing development within WMA" consistent with the Draft RLMP. Concentrating

trails (or even worse, concentrating both roads and trails) near existing development could result in e?ectively creating wildlife avoidance areas or 'sacri?ce zones' within the boundaries of WMAs, which would be more consistent with Recreation Emphasis Areas, not with WMAs. The WMA concept was created to maintain or improve landscape level habitat connectivity within WMA polygon boundaries. Creating wildlife avoidance areas within a WMAs is entirely inconsistent with this management area designation. If an area is identi?ed as necessary for high density trail development, it either needs to have enforceable seasonal route or area closures each year during the season of use by area wildlife (which is not currently accomplished by existing plan components), or not be incorporated in a WMA polygon boundary as it may be avoided by wildlife, thereby contributing to habitat fragmentation.
Of the WMAs listed in Table 98 (in EIS Volume 1, Chapter 3) for the Preferred Alternative, 31 out of 57 WMAs have a calculated baseline TerraTrails route density of less than 1.0, representing 214 miles of routes that, under the current Pre-Objection WMA standards and guidelines, could all be constructed at high local route densities in the highest value habitat within those WMAs. If FW-GDL- SPEC-15 were a standard instead of a guideline, and if it required seasonal route and area closures in CPW-mapped High Priority Habitat (per our 2021 comments on the Draft RLMP), that would alleviate some of our concerns, but without these changes, the highest priority habitats within WMAs are not protected against disturbance, degradation, fragmentation, or avoidance by wildlife. Unless the approach for calculating and managing route density outlined in MA-STND-WLDF-02 is revised to what was presented in the Draft RLMP, additional standards and guidelines are needed to prevent new trails in WMAs from decreasing habitat connectivity by consuming and fragmenting top-tier habitat and sensitive areas within WMAs.

[FIGURE 1: ArcGIS Online map image showing the discrepancies between the COTREX recreational route database (purple dotted

lines) and the GMUG's TerraTrails layer (black dashed lines), as well as signi?cant overlap between existing routes and CPW-

mapped High Priority Habitat within WMAs]

In Figure 1 above, elk migration corridors are especially prominent (medium blue-colored areas) and most of the existing routes in both the Sawtooth WMA and Old Cochetopa Corridor WMAs overwhelmingly overlap CPW-mapped High Priority Habitat. If the GMUG concentrates new route development near existing development in the Sawtooth WMA, where the GMUG estimates the baseline route density to be only 0.5 linear miles per square mile, the GMUG will undoubtedly decrease habitat connectivity and habitat function in this WMA unless additional plan components are added to direct development and land use away from High Priority Habitat; encourage re-routes and reduction of route density within High Priority Habitat; and/or require seasonal or area closures within High Priority Habitat. Thus, the new direction in MA-STND-WLDF-02 to concentrate new trails near existing development will directly con?ict with FW-DC-SPEC-12, which seeks to provide "relatively undisturbed migration and movement corridors," and MA-DC-WLDF-01, which seeks to provide "security for the life history, distribution, and movement of many species, including big game species" and to maintain or improve habitat connectivity.

c) Modify MA-STND-WLDF-02 according to bullet 2(b) above or change MA-STND-WLDF-02 to clarify where new road and trail development should take place. The addition of the sentence "new trail development within a wildlife management area unit should concentrate near existing development and avoid large blocks of unfragmented habitat to the extent feasible" (added between the Draft and the Pre-Objection RLMP) puts at risk important parts of wildlife habitat within WMAs, threatening to convert otherwise usable, permeable habitat into habitat avoidance areas. We request that new road and trail development be in areas where local route density does not exceed 1 linear mile per square mile and avoid High Priority Habitat and large blocks of unfragmented

habitat to the extent feasible.

d) Modify MA-STND-WLDF-02 directions on calculation of route density baselines to omit special treatment of trail switchbacks, or change the approach to facilitate permeability per TRCP objection comment 3(a). We agree that switchbacks are necessary for sustainable trails, and our understanding is that the 1.5-mi search radius used in the calculation was intended to atenuate the in?uence of switchbacks by moderating their in?uence on the local, resultant 1mi x 1mi grid cell density value. If the GMUG elects to consider route density at a local scale, for example at a 1mi x 1mi grid cell (as was utilized in the Draft RLMP) or a 30m x 30m grid cell as is used for calculating route density in the Pre-Objection RLMP, then special consideration for switchbacks can be justi?ed. However, if the Forest elects to proceed with the much-simpli?ed approach outlined in the Pre- Objection RLMP, rolling the route density metric up to an average across entire WMAs, then there is no need for switchbacks to be treated di?erently in low-resolution density calculations. Switchbacks can create a broad zone of disturbance to wildlife on the ground, even if occurring on sustained steep slopes, so a linear estimation of a switchback area may not technically make sense. Rather, a rectangular disturbance envelope or wildlife avoidance area could more accurately represent the in?uence of a switchback. If the GMUG is simply going to average route density to the whole WMA scale, then diluting local density anomalies in this way is unwarranted and not supported by the best available science.

e) Incorporate a new Standard requiring new routes in WMAs to be developed outside of CPW- mapped High Priority Habitat and sensitive areas (e.g., riparian or high alpine areas). Because the GMUG took a new approach to applying the route density standard in the Pre-Objection RLMP, we request that a new Standard be added to moderate the anticipated impacts of the changes noted above; to achieve the stated intent of MA-SDC-WLDF-01; and to achieve the stated desires of GMUG sta?, who expressed the intent to avoid adding new routes in the most critical, high-value habitats within WMAs. WMAs do not entirely overlap what CPW de?nes as High Priority Habitat, and not all habitat within a WMA is equally valuable to wildlife. The Pre-Objection RLMP Standard MA-STND- WLDF-02 requires concentrating new routes near existing development without any other standards in place to require avoidance of High Priority Habitat. The application of this Standard may result in new routes within WMAs being concentrated within the highest-value parts of overall habitat, rendering them unusable by the wildlife and having disproportionate adverse impacts on habitat function and connectivity within WMAs.

f) Change FW-GDL-WLDF-04 to clarify expectations and guidelines for ensuring vegetation management projects in WMAs, including commercial timber projects, are habitat-centered, science-based, and not limited to providing bene?t to wildlife habitat only in the long-term.

Based on our 2021 comments on the Draft RLMP, we request that this guideline incorporate the following clear direction for vegetation management within WMAs: to maintain long-term habitat connectivity and function within wildlife management areas, vegetation management, including timber management projects, fuels treatments, and wildlife habitat treatments within WMAs should be designed speci?cally to retain or enhance wildlife habitat diversity and connectivity and should maintain or enhance forage production and availability. To accomplish these goals, vegetation management projects in forested portions of WMAs should be designed so that:17,18,19,20

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* ~20 percent of the habitat is available hiding cover. Hiding cover is any vegetation capable of hiding 90 percent of a standing elk at 60 m (200ft);

*
*

* ~20 percent of the habitat is available as thermal cover. Thermal cover is a Forest stand at least 12 m (40 ft) in height with tree canopy cover of at least 70 percent;

*
*
* Wildlife security areas greater than 250 acres in size and at least 0.62 mile (1,000 m) from open motorized system routes and 0.41 mile (660 m) from open nonmotorized system routes are retained. Hiding and thermal cover habitats may be equivalent and either or both may provide for wildlife security areas. Hiding and thermal cover combined should comprise ~40% of the landscape.

*
*
* ~60 percent of the habitat may consist of openings of 12 to 16 ha (30 to 40 ac) with distances across openings of 365 m (1200 ft) or less; and

Timber will be left standing along open system routes to provide wildlife security and visual obstruction of open blocks of habitats (clear cuts, meadows, alpine) occurring (or to be made via timber harvest) that are visible from routes. The screening should leave at least 80% of the original visual obstruction measured pre-timber harvest and/or utilize topographic features that reduce the visual distance.

See also FW-GDL-SPEC-15, FW-GDL-SPEC-12, STND-SPEC-35 (VEG S8), FW-STND-SOIL-03, FW-OBJ-TMBR-C, FW-GDL-TMBR-07.b, FW-GDL-TMBR-07.c, FW-DC-TSTN-01, FW-STND-TSTN-04, and

management approaches for Canada lynx.

4. The 'route density baseline' calculations for each WMA are based on unclear data sources, the GMUG's public-facing "TerraTrails" feature layer is inconsistent with the official state recreational route database, and reference terminology changed between the Draft and Pre-Objection RLMP.

Between the Draft and Pre-Objection version, the GMUG added the term "terra" to MA-STND-WLDF-02 to clarify that "system terra routes" represent terra, not over-snow routes. The GMUG's terra routes sources are not de?ned in the plan glossary, or in Appendix 12, Ch. 3 Management Area Direction for Wildlife Management Areas (despite the fact that Table 98 in EIS Volume 1, Chapter 3 says to "see also forest plan Appendix 12 for more details regarding density methodology and supporting science").

In comparing the GMUG_TerraTrails feature layer updated by ArcGIS user USFSRegion02 on Aug 09, 2023 to CPW's COTREX data layer available in ArcGIS Online, it is clear the Terra Trails layer is missing a signi?cant number of routes that are mapped in the state's o?cial sanctioned recreational route database. Figures 1 (above) and 2 (below) provide useful comparisons, where the COTREX recreational routes are shown as doted purple lines and GMUG Terra Trails are shown as thick dashed black lines.

COTREX routes represent both roads and trails that are used for recreational purposes, and the routes are provided to CPW from land management agencies (including USFS District O?ces) and local and county

recreation and land management o?ces.21 These are public-facing maps so members of the public use these.

Knowing that GMUG's TerraTrails layer, and potentially the route density baseline calculations may be missing inventoried and sanctioned recreational routes used by the public, and knowing that these route density baselines are also missing unauthorized and user-created recreational routes underscores how critical it is that the GMUG take a more active approach to improving habitat connectivity and function by minimizing the impacts of habitat fragmentation by routes- including roads and trails, whether administrative, authorized, or unauthorized. Adding the plan components discussed in sections above would layer on necessary spatial and temporal management measures that would allow the GMUG to e?ectively conserve key habitats while still facilitating sustainable multiple uses.

[Figure 2: Map image of the GMUG forest where COTREX trails (purple dotted lines) show signi?cant inconsistencies with the GMUG's TerraTrails layer (thick black dashed lines) within the GMUG planning area (outlined with bold green lines).]

5. The Preferred Alternative does not include plan direction consistent with federal and state policy to maintain habitat function and habitat connectivity in speci?c geographic areas identi?ed as having outstanding wildlife values.

One of the planning strategies in the RLMP to balance increased recreation demand and existing wildlife habitat and backcountry hunting opportunities is through the designation of WMAs with additional plan components. There are several proposed WMAs, or portions thereof, identified as having outstanding wildlife habitat and backcountry hunting values by Backcountry Hunters & Anglers (BHA) in their GMUG Wild Lands and Wildlife Report22 and by both BHA and TRCP in our November 2021 comments on the Draft RLMP, that are not included in the Preferred Alternative. Most of these areas are also mapped by CPW as High Priority Habitat for migratory ungulates.

In some cases, the Preferred Alternative has designated these recommended WMA polygons as CRAs, and in others they are designated as General Forest and Rangeland. Without additional plan components to limit the route density and impacts of recreation on CPW-mapped High Priority Habitat and CRAs as we have suggested (above), there is no guarantee that these areas will continue to provide the necessary habitat function and connectivity for wildlife or maintain their roadless character. Due to their high value for wildlife, to resolve our objection we request that the following areas identified in the table below receive WMA designation. Alternatively, our objection for these areas would be resolved if the Forest Service incorporated the additional plan components recommended above for CPW-mapped High Priority Habitats and CRAs.

[TABLE Areas Needing WMA Designation, Expansion, or Additional Plan Components to Maintain WIldlife Values] SEE Table in original PDF

In Conclusion, we believe that with the right plan components layered into the GMUG RLMP, the GMUG can successfully facilitate sustainable use, stable and thriving wildlife populations, and high-quality hunting, fishing, and developed recreational experiences while supporting local and regional economies.

To achieve success in balancing the needs of ecosystems and communities and to resolve our objection, the TRCP requests that the Forest Service modify the Preferred Alternative to include plan components that:

1. Reflect the best available science to conserve migration corridors and maintain habitat connectivity for the highest priority CPW-identified and mapped seasonal habitats for migratory ungulates, beyond areas specifically managed as Wildlife Management Areas.
2. Maintain the roadless character of Colorado Roadless Areas, consistent with the Colorado Roadless Rule.
3. Maintain habitat function, provide security habitat, and maintain or improve habitat connectivity in Wildlife

Management Areas.
4. Reflect the most up-to-date recreational route database(s) and include clear descriptions of route density baseline input data and calculations.
5. Maintain habitat function and habitat connectivity in specific geographic areas identified as having outstanding wildlife values.

Thank you for considering our comments. We look forward to participating in resolution discussions.

Sincerely,

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