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Comments: I am submitting the following comments on behalf of the Colorado Chapter of Backcountry Hunters & Anglers. I currently serve our Chapter as the Regional Director for the Central Western Slope. Our chapter currently has over 1,300 members from throughout the State, and we have a vested interest in the management of the Grand Mesa, Uncompahgre, and Gunnison National Forests.

We appreciate the opportunity to continue to provide public comments and input to the Forest Plan Revision and to establish standing in the planning process and eventual draft decision.

We are very pleased to see that the species assessment has been revised to include Species Of Interest; Rocky Mountain elk, mule deer, pronghorn, moose, black bear, mountain lion, dusky grouse, Merriam[rsquo]s wild turkey, small game, and common trout. The revised species assessment and its findings provide the necessary connection in the planning process to enable the Forest Service to fully consider and incorporate this group of species, and reflect the interests and major issues that we believe the Forest Service should concentrate on in the Forest Plan Revision.

Part 1: Forest Plan Vision, Roles and Contributions

The GMUG National Forests provide essential habitat for a wide variety of wildlife and fish, and it is a National destination for hunting and fishing as well as wildlife watching. Hunters and anglers have tremendous opportunities to enjoy large backcountry habitats in pursuit of fish and game, as well as the solitude and challenge of experiencing large intact landscapes.

Currently 46% of the GMUG is classified as wilderness or roadless. The Forest has an estimated 3,600 miles of perennial streams, 7,000 miles of ephemeral and intermittent streams, and numerous lakes and reservoirs that support outstanding fisheries. These public lands and waters provide an essential role in maintaining large, uninterrupted blocks of connected habitat and streams that are crucial to perpetuating our populations of wildlife and fish.

Our vision of the GMUG would reflect direction within the 2012 Planning Rule (page 58 of the revised assessment). [ldquo]Consistent with the 2012 Planning Rule, Forest Plan components for Species of Interest will include components for desired conditions, standards, guidelines, and/or goals/objectives. Forest plan components will provide direction to maintain or restore key ecosystem characteristics that benefit multiple species, protect or conserve important common habitat components, provide additional species-specific direction as needed, and provide direction to maintain existing, relatively un-fragmented big game habitat and associated

hunting opportunities and other wildlife habitat, in the context of sustainable resource management[rdquo].

Our vision would include the retention and enhancement of the existing wilderness, special management areas, and roadless areas where resource management is focused on the recovery of T&E and sensitive plants and animals, resolving conflicts between wildlife and livestock, and maintaining and improving habitat for wildlife and fish Species Of Interest. Developed recreation and trails would be very limited in these areas to prevent habitat fragmentation and limit the degree of human disturbance. Recreation and trails development on other parts of the Forest would be based upon desired ROS designations and a landscape-scale strategy that provides for the seasonal habitat needs of wildlife and is implemented under comprehensive travel management plans.

Livestock grazing on the Forest would occur only where ecologically sustainable and compatible with fish and wildlife population objectives. Adjustments to annual grazing use during periods of drought would be implemented to maintain potential plant species composition and retain forage for wildlife. Issues such as the potential for disease transmission from domestic to wild sheep would be resolved in favor of bighorn sheep. Forage would remain on the land after livestock grazing use in sufficient quantity to provide forage for wild ungulates. Streams and riparian vegetation would not be impacted by livestock grazing practices.

Part II: Key Needs for Change

The scoping document has organized key needs for change from the assessments into seven major themes and be used to focus the planning process.

Theme 1 [ndash] Provide Strategic, Adaptive Direction.

Management direction in the Forest Plan should be clear and concise so that we the public, and Forest Service managers, can understand exactly what the goals and objectives are for any particular resource, and how to resolve conflicts that may occur between incompatible uses or situations where that use is causing significant resource damage. Management direction that is strategic and adaptive in nature must be based upon a system of resource allocations and acceptable levels of use and have defined management practices and thresholds for change when situations change. Project-level planning and implementation must be based upon Forest-level analysis and guidance that clearly reflects the resource values present and proper methods of sustaining those values based on the best available science and experience of public land managers.

District Rangers and their staff need to have clear and concise direction within the Forest Plan. Prescriptive direction has an important role in providing that clarity and avoiding inconsistency between ranger districts and district rangers. For example, the scoping document refers to outdated management direction for wildlife and timber practices. We agree that some of this direction could be improved through consideration of more recent

science, but in practice, prescriptive direction provides better implementation and mitigation of impacts to other resources through the use of applied science and the collective experience of resource specialists.

Theme 2 [ndash] Contribute to Social and Economic Sustainability

We strongly believe that hunting and fishing provide people and communities with social and economic benefits for present and future generations. According to Colorado Parks and Wildlife 2008 Economic Impact Report, hunting and fishing generated an estimated $1.8 billion dollars for Colorado[rsquo]s economy in 2007, and wildlife watching generated an estimated $1.2 billion in 2006. In addition, hunting and fishing supported approximately 21,000 jobs statewide and wildlife watching supported an additional 12,800 jobs. Local communities surrounding the GMUG and outfitters and guides operating on the Forest are highly dependent upon this income. The benefit of hunting and fishing needs to be recognized and included in this theme.

We also recognize the value of recreation to our local communities and the desire to increase trail systems and other recreational developments in some areas. The scoping document states that [lsquo]in many areas recreation is a driver and should be a major consideration when forest plan desired conditions are developed[rdquo]. We suggest that hunting and fishing is also an economic driver that should be a major consideration in the development of forest plan desired conditions.

These two uses, 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.

We believe there is a need to provide abundant intact habitat to perpetuate thriving populations of fish and game to sustain our hunting and fishing opportunities and numerous outfitter and guide operations on the GMUG, and this should be a major focus in the Forest Plan Revision.

Theme 3 [ndash] Provide for Ecological Sustainability

The assessment for Terrestrial Ecosystems described various ecosystem stressors upon ecological sustainability. We believe that this assessment under-emphasized the extent and severity of livestock grazing and recreation on the ecological integrity of many forest ecosystems. The effects of livestock grazing are primarily reflected in the current condition and trend of vegetation, as well as levels of annual forage use by

livestock. We see these effects extending throughout the Forest, including the San Juan Mountains. There are several known and documented aspen regeneration failures due to cattle and sheep grazing, as well as degraded ecological condition of meadows and sagebrush parks. Livestock grazing has also significantly altered fire patterns, especially in the ponderosa pine and pinyon-juniper.

Recreation impacts to ecological integrity of many ecosystems have resulted from increased trail development and disturbance which cause habitat fragmentation, disrupt migration, and displace wildlife from seasonal concentration areas. Roads and trails are primary influences on habitat patch size and connectivity. We see these effects occurring on many areas of the Forest and on adjacent BLM lands. Recreation impacts from increased trail development and use upon ecological integrity needs more emphasis in the Forest Plan.

We believe that these are significant issues on the GMUG that need to be incorporated into this Theme and that they should be specifically addressed as key needs for change.

Theme 4 [ndash] Maintain the Diversity of Plant and Animal Communities

Thank you once again for including Species Of Interest in this Theme. We fully endorse the component to [ldquo]provide direction to maintain existing, relatively unfragmented big game habitat and associated hunting opportunities, and other wildlife habitat, in the context of increasing development, including recreational trails[rdquo].

We also endorse the component related to wildlife and livestock conflicts with one edition [ndash] [lsquo]Provide plan direction to minimize wildlife and livestock conflicts (elk, bighorn sheep, etc) in coordination with permittees and the appropriate agencies such as USFWS, WLS, CPW, and sportsmen[rdquo].

We would like to see the forest plan include direction to review and update existing sheep allotment management plans within 5 years to provide full separation of domestic sheep and bighorn. Full separation is the only known method of effectively preventing disease transmission between domestic and wild sheep and sustaining our bighorn sheep populations where they overlap.

This Theme should also include the need for active vegetation management to sustain our fish and wildlife habitats and capacity to support CPW population objectives. In the past, the GMUG has had an active program of fish and wildlife habitat improvement, utilizing extensive partnerships with organizations such as Trout Unlimited, the Mule Deer Foundation, Wild Turkey Federation, and Rocky Mountain Elk Foundation. We have serious issues with stream habitat fragmentation and isolation of fish populations due to improper road culvert installations, dams, and reservoirs. We also seriously need to continue a program of habitat improvement work utilizing prescribed fire, mechanical treatments, and seeding to maintain forage and browse production and

diversity on the Forest. We believe that these are significant issues on the GMUG that need to be incorporated into this Theme and that they should be specifically addressed as key needs for change.

Theme 5 [ndash] Integrate Resource Management for Multiple Uses and Ecosystem Services

We fully endorse the idea that Recreation Opportunity Spectrum (ROS) should be used to better integrate resource management on the GMUG. In the past, ROS has been a consequence of other management activities instead of being used to direct those activities to meet desired conditions. It is essential that the Forest Plan undergo a thorough analysis of ROS, including various alternatives, to demonstrate how we can meet a variety of multiple uses and activities. We should definitely [ldquo]include the use of backcountry areas to support wildlife habitat objectives, in addition to primitive and semi-primitive recreation opportunities[rdquo].

This would include [ldquo]integrated resource direction for designated Colorado Roadless Areas since the 1983 Plan preceded designation of these areas[rdquo]. As I stated previously, this is our golden opportunity to recognize these areas for their fish and wildlife values and to provide direction to emphasize fish and wildlife management in these areas remaining on the Forest.

Theme 6 [ndash] Incorporate Best Available Science, Update to Existing Law and Policy

One of the principals upon which BHA was founded is to promote science-based wildlife management of our public lands and waters. Standards and Guidelines for fish and wildlife within the current forest plan were based on the best available science and professional experience at the time. Specifically, the HABCAP model wasn't the best in the world but was good for the 30+ years it has been available for wildlife analysis and project implementation. It also provided pretty decent standards & guidelines for habitat effectiveness in the Forest Plan that were used to plan and implement timber sales and travel management plans.

Table 3 within the revised Species Assessment identified the need for change to some of those standards and guidelines to incorporate more recent science. I think you and CPW are on the right track using the latest science from Wisdom et al at the Starkey Experiment Station. At this point in time I think it is the best science available. The eventual standards for open road densities you refer to need to include motorized and non-motorized (mountain bike) trails as well. There is clear evidence of the impact from recreation trails too.

Our BHA Chapter has been exploring the best available sources of research on the effects of recreation on wildlife. We submit this research for your consideration during the Forest Plan Revision:

[ldquo]Colorado BHA Report: Impacts of Off-Road Recreation on Public Lands Habitat.[rdquo] Backcountry Hunters & Anglers: 5/21/18.https://www.backcountryhunters.org/colorado_bha_report_impacts_of_off_road_recreation_on_public_lands_habitat

Theme 7 [ndash] Build an Accessible, Useful Plan

Please refer to my comments on Theme 1 [ndash] Provide Strategic, Adaptive Direction.

Part III: Management Area Framework

The scoping document proposes a similar framework to the Key Needs for Change through utilization of six Themes to represent unique Management Area designations with corresponding management emphasis.

Theme 1 [ndash] Natural Processes Dominate

This management area will include all currently designated Wilderness Areas and Special Management Areas, as well as Upper Tier Colorado Roadless Areas. It would also include any potential Wilderness or Special Management Areas recommended by this Forest Plan Revision.

In these areas, natural processes would dominate management. They would not be suitable for timber production or harvest. We believe that they should also not be suitable for energy development or developed motorized and non-motorized (mountain bike) trails systems to prevent habitat degradation and retain high quality streams and wildlife habitat as well as the opportunity for backcountry hunting and fishing, backpacking, horse packing, solitude and other quiet uses.

Wilderness areas and Upper Tier Colorado Roadless Areas currently support a majority if not all of our bighorn sheep populations on the GMUG. They also provide vital habitat for many T&E species of plants and animals, as well as Forest Service sensitive species. The same areas include the headwaters of major river systems and provide high quality, sources of water that support world class fisheries. Wilderness and roadless areas also provide large areas of unfragmented intact habitat for our wild populations of elk, mule deer, and

moose.

These public lands and waters provide an essential role in maintaining large, uninterrupted blocks of connected habitat and streams that are crucial to our populations of wildlife and fish. This Theme represents an opportunity to provide direction to maintain existing, relatively un-fragmented big game habitat and associated hunting opportunities, and other wildlife habitat, in the context of increasing pressure from development, including recreational trails. For these reasons, we recommend including an emphasis on fish and wildlife management into this theme.

Theme 2 [ndash] Special Areas and Unique Landscapes

The tentative description for this Theme in the Scoping Document is [ldquo]management emphasis is tailored toward unique features of the particular area. Not suitable for timber production or harvest.

We suggest that these areas should also not be suitable for energy development or developed recreation sites other than interpretive signage to protect the unique character of those sites.

Theme 3 [ndash] Backcountry, Including Non-Upper Tier Colorado Roadless Areas

Retaining and enhancing our remaining backcountry areas is of vital importance to us. Once these areas are developed, there is virtually no practical way we can restore the values they currently provide. In combination with those lands within Theme 1, these public lands and waters provide an essential role in maintaining large, uninterrupted blocks of connected habitat and streams that are crucial to our populations of wildlife and fish. This Theme represents an opportunity to provide direction to maintain existing, relatively un-fragmented big game habitat and associated hunting opportunities, and other wildlife habitat, in the context of increasing pressure from development, including recreational trails.

We firmly believe that the primary management emphasis of these areas should be focused on fish and wildlife habitat protection and management, as well as backcountry hunting and fishing opportunities. The emphasis for recreation would be to provide primitive to semi-primitive ROS, with very limited to no motorized and non-motorized (mountain bike) trail systems. Overall open road and trail densities within this management area would be maintained at or reduced to low densities, and include seasonal closures of big game winter range. Timber harvest and energy development would not be suitable in these areas, but active management of vegetation with prescribed fire and mechanical treatments would be allowed to continue to maintain and improve habitat conditions.

Theme 4 [ndash] Recreation Focus Areas/High-Use Recreation Emphasis

We fully recognize and understand the demand for dispersed and developed recreation opportunities on the Forest, and there should be areas designated to accommodate present and future uses. However, that development should be considered only where it is compatible with wildlife resource values and primitive recreation opportunities. Before any large-scale trail systems are planned or developed, we think it should be mandatory to develop a landscape-scale analysis of key wildlife habitats and seasonal concentration areas to identify areas that would be potentially suitable for development or not suitable for development in order to retain habitat connectivity and integrity.

That analysis and planning process should only be conducted through an open and inclusive travel management planning process under NEPA, and not be driven entirely by proponents of recreational development. Ideally, recreation focus areas would be concentrated near larger communities and resort towns close to the Forest, and also consider what is available on adjacent BLM lands.

We also believe that any road density standards and guidelines that may be developed for the Forest should include motorized and non-motorized (mountain bike) trails in those calculations because of the documented impact of trails upon wildlife habitat effectiveness.

Theme 5 [ndash] General Forest/Active Management

We suggest a couple of edits to the tentative description for this theme.

The Forests and rangelands are actively managed for a variety of multiple uses and management objectives. Suitable for timber production, fuels treatments, wildlife habitat and rangeland improvements. Motorized and non-motorized recreation is based upon the designated ROS and compatible with wildlife habitat objectives and seasonal big game concentration areas. Includes the wildland Urban Interface/frontcountry areas of the Forests and extends to the edge of backcountry areas.

We also think there should be direction within the Forest Plan for appropriate levels of livestock grazing use, including grazing intensity and duration of use to guide allotment management plans. We are aware of and consistently observe many areas of the Forest that are heavily grazed year after year, resulting in altered plant species composition, reduced forage production, and a prevalence of invasive species. We believe this is often due to rangelands being overstocked and very long grazing seasons.

Theme 6 [ndash] Highly Developed Areas (non-recreation emphasis, i.e. utility corridors)

Our infrastructure is an important element to consider in this Plan Revision. Utility corridors should be permitted in areas previously evaluated for the Nation, and as many corridors clustered into one corridor as possible.

Utility corridors should avoid any designated Wilderness and Special Management Areas, as well as Upper and Lower Tier Colorado Roadless Areas.