August 20, 2014

Colorado Parks and Wildlife
Att: Ron Velarde, NW Region Manager
711 Independent Avenue
Grand Junction, CO 81505
Via Email only

RE: Mule deer population plan

Dear Mr. Velarde;

Please accept this correspondence as the comments of the Colorado Snowmobile Association ("CSA"), Trail Preservation Alliance ("TPA") and Colorado Off-Highway Vehicle Coalition ("COHVCO") with regard to the development of the mule deer strategic plan as currently reflected in the document entitled "The Story of Colorado's mule deer" ("The Plan"). Prior to addressing the specific concerns of the Organizations on this issue, a brief summary of the Organizations is necessary to establish the basis for these comments. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization advocating for the approximately 200,000 registered OSV and OHV vehicle users in Colorado seeking to represent, assist, educate, and empower all OHV recreationists in the protection and promotion of off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates and promotes the responsible use and conservation of our public lands and natural resources to preserve their aesthetic and recreational qualities for future generations.

The Trail Preservation Alliance ("TPA") is a 100 percent volunteer organization whose intention is to be a viable partner, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding. The TPA acts as an advocate of the sport and takes the necessary action to insure that the USFS and BLM allocate to trail riding a fair and equitable percentage of access to public lands.

Colorado Snowmobile Association ("CSA") was founded in 1970 to unite winter motorized recreationists across the state to enjoy their passion. CSA advocates for the 30,000 registered snowmobiles in the State of Colorado. CSA has become the voice of organized snowmobiling seeking to advance, promote and preserve the sport of snowmobiling by working with Federal and state land management agencies and local, state and federal legislators. For purposes of these comments, COHVC, CSA and TPA will be referred to as the Organizations.

The Organizations thank you for holding the public meeting in Glenwood Springs to address this important issue, and we apologize for not being able to attend that meeting. Please accept this document as our preliminary thoughts on this issue. The Organizations commend CPW for proactively addressing the recent declines in mule deer populations in Colorado. CPW has a long history of proactively addressing wildlife population related issues such as this and the Organizations believe that continuing to manage wildlife population issues proactively must be pursued. The Organizations believe wildlife is a critical component of the hunting experience many of our members enjoy and is a critical component of the high quality recreational experience that has become synonymous with Colorado. The Organizations have a long history of partnering with USFS, BLM and CPW to address wildlife issues on a local level in areas where motorized usage occurs, such as seasonal closures of winter range and calving areas to usage, providing on the ground funding to land managers to address any site specific issues that might be impacting resources and with development of the Stay the Trail program.

1a. Landscape level recreation planning for wildlife.

As an initial matter, the Organizations will note that the entire state of Colorado has moved to a designated trail system for motorized travel with the recent release of new Resource Management Plans from several BLM field offices including the Colorado River Valley Office, Kremmling Office and Grand Junction Field Office. The Organizations vigorously assert that these management changes mark the completion of one of the few landscape level management changes for multiple use recreational usage that can benefit wildlife populations. This BLM management change will further reduce possible impacts from off trail usage for a variety of activities including shed collections and other off trail activity that has been prohibited by the USFS for a long period of time.

The Organizations are aware that any incremental benefits that can be achieved from additional travel management for the benefit of wildlife are limited after a planning area has moved to a designated route system. The US Forest Service's Rocky Mountain Research Station has recently released extensive analysis of the effectiveness of travel management restrictions on addressing sensitive species related issues concluding as follows:

> "Actions such as limiting grazing or closing OHV trails have historically been some of the primary tools used by land managers in southern Nevada to reduce the effects of anthropogenic stressors on species of conservation concern..... It is evident from this body of research that very little is known about the relative threats posed to, or the mitigation actions needed to protect, virtually any species, except perhaps the desert tortoise. Too often research jumps immediately to mitigation strategies without first determining what specific factors pose the greatest threats and are the most important to mitigate. In addition, the evaluation of potential threats typically focuses upon the usual anthropogenic suspects (e.g. OHVs, livestock grazing, invasive species, and climate change) without first carefully considering which factors are most likely to pose the greatest threats."[1]

The National Park Service has echoed these sentiments, when addressing winter travel and usage of the Yellowstone National Park. The Park Service has clearly stated as follows:

> "Based on these population-level results, we suggest that the debate regarding effects of human winter recreation on wildlife in Yellowstone is largely a social issue as opposed to a wildlife management issue. Effects of winter disturbances on ungulates from motorized and non-motorized uses more likely accrue at the individual animal level (e.g., temporary displacements and acute increases in heart rate or energy expenditures) than at the population scale. A general tolerance of wildlife to human activities is suggested because of the association between locations of large wintering ungulate herds and winter recreation. Habituation to human activities likely reduces the chance for chronic stress or

[1] *See,* USDA Forest Service, Rocky Mountain Research Station; *The Southern Nevada Agency Partnership Science and Research Synthesis; Science to Support Land Management in Southern Nevada; Executive Summary*; August 2013 at pg 38.

> abandonment of critical wintering habitats that could have significant effects at the population level, especially when these activities are relatively predictable."[2]

The Organizations believe that the Research Station position is an accurate reflection of best available science on management of species after any planning area has moved to a designated route system, such as that which have now been uniformly been adopted by USFS and BLM in Colorado. The identification of the additional limited benefits is critical in the planning process, as the Organizations are aware that there is and probably always will be, significantly limited funding for the management of all public lands and as a result these funds must be directed toward management changes and priorities that achieve the largest population benefits from those funds.

1b. All usage should be addressed in habitat areas.

The Organizations are aware that restrictions on multiple use recreation is frequently seen as the first and most effective management tool to be used for the improvement of habitat areas for wildlife. The Organizations are unsure as to the basis of this management priority as often wildlife displays far higher levels of response to a variety of other activities in a habitat area. In 1999, the Wildlife Society published an extensive analysis of activities that are impacting wildlife habitat. A full chapter of this book was devoted to wildlife response to off leash dogs. [3] The conclusions of this work were summarized as follows:

> "Authors of many wildlife disturbance studies concluded that dogs with people, dogs on-leash, or loose dogs provoked the most pronounced disturbance reactions from their study animals. .... Dogs extend the zone of human influence when off-leash. Many ungulate species demonstrated more pronounced reactions to unanticipated disturbances, as a dog off-leash would be until within very close range."

The Organizations believe that if landscape level management standards for the usage of habitat are pursued, these management standards must pursue the holistic improvement of this habitat and expand beyond the closure of areas to multiple use recreation.

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[2] *See*, US Park Service; White and Davis; *Wildlife response to motorized recreation in the Yellowstone Park; 2005 annual report*; at pg 15.

[3] *See*, Sime, C. A. 1999. *Domestic Dogs in Wildlife Habitats*. Pages 8.1-8.17 *in* G. Joslin and H. Youmans, coordinators. Effects of recreation on Rocky Mountain wildlife: A Review for Montana. Committee on Effects of Recreation on Wildlife, Montana Chapter of the Wildlife Society. 307pp.

1c. CPW efforts to minimize the impacts of urbanization of private lands must be highlighted.

The Organizations are aware that impacts of urbanization of private lands often results in significant declines in the size and quality of wildlife habitat as a whole and more particularly winter range of all species. The Organizations believe these issues are highlighted by traveling down many of the Colorado state highways. Many areas that were large ranches, where winter range was shared between wildlife and domestic animals, 50 years ago have been converted to subdivisions and other more intensive urbanization of these historic grazing areas. Once these areas are converted to subdivisions, the quality of this range significantly diminishes. Often attempts to offset the impacts from development of private land are inaccurately directed towards restrictions on management and usage of adjacent public lands. These attempts simply have generated minimal benefits and must be avoided moving forward.

CPW has proactively addressed these urbanization issues with an active conservation easement program to actively protect habitat areas on private lands from urbanization and other development. The Organizations are aware that these conservation easements have been highly effective in protecting these habitat areas. These private lands are areas that are outside of the NEPA process and where public support for the management is a critical component of the management process. Protecting access to adjacent public lands in order to maintain the public support for the voluntary restrictions that the easements are placing on high quality habitat on adjacent private lands. This relationship must not be overlooked.

1d. Forest Health concerns from Mountain Pine Beetle must be addressed for all species.

The Organizations note that recent decline in overall forest health issues are throughout the Rocky Mountain region are not addressed in the Plan. The Organizations believe this is an oversight and that the rapidly decline in forest health resulting from mountain pine beetle and other insect infestations represents a significant challenge for all land managers moving forward. The Organizations are aware that a timber sale on a State Wildlife area can be difficult, but these types of activities are far more difficult on federal public lands and this is an issue where the partnership between federal land managers and CPW must be fully used. The impacts of these infestations has been recognized at the landscape level by the USFS as follows:

> "Recent studies conducted by the RMRS in forest stands near Fraser, CO suggest that lodgepole pine will remain the dominant species in harvested stands over the next century, but subalpine fir will become the most abundant species in

> untreated areas. The long-term consequences of the outbreak will be most dramatic in untreated areas, where the shift in tree species composition will influence timber and water production, wildfire behavior, wildlife habitat and other forest attributes."[4]

The Colorado State Forest Service recently stated this position, and the large scale impacts that are going to be impacted as follows:

> "Seventeen of Colorado's "Species of Greatest Conservation Need," as identified by Colorado Parks and Wildlife, rely on spruce-fir forests for their primary habitat. Change in forest cover of spruce-fir forests could negatively impact the habitat of these species."[5]

Many recently released management documents for specific species have echoed these sentiments regarding the decline in habitat quality as a result of insect infestations. In 2013, the USFWS identified the degraded habitat that results from the mountain pine beetle outbreak as a first tier anthropogenic influence on the quality of Lynx habitat. This concern is reflected as:

> "An increasing occurrence and persistence of drought, along with associated insect outbreaks and wildfires, could rapidly and dramatically affect the distribution, amount, and composition of lynx habitat"[6]

The Organizations believe that the impacts to all wildlife habitat from the mountain pine beetle is a major concern moving forward. The Organizations believe that resolution of these impacts, to the extent possible, must be a priority for the management of any wildlife habitat areas moving forward. The Organizations believe that identification of this issue in the Plan will allow discussions and resources to target this issue moving forward and allow for complete utilization of limited resources.

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[4] *See*, USDA Forest Service; Rocky Mountain Research Station; *A Review of the USFS Response to the Mountain Pine Beetle Outbreak in Northern Colorado and Southern Wyoming*; September 2011 at pg. 18.

[5] *See*, Colorado State Forest Service; *Quick Guide Series; Spruce Beetle*; FM 2014-1 at pg 6.

[6] *See*, Interagency Lynx Biology Team. 2013. *Canada lynx conservation assessment and strategy. 3rd edition*. USDA Forest Service, USDI Fish and Wildlife Service, USDI Bureau of Land Management, and USDI National Park Service. Forest Service Publication R1-13-19, Missoula, MT. 128 pp at pg 70.

2. Conclusion.

The Organizations applaud CPW for continuing the proactive management of species in Colorado with the development of the Mule Deer Plan. The Organizations believe that best available science is a critical component of proactive management of habitat issues and that accurately applying best available science must be performed to allow limited budgets of all land managers to be accurately and meaningfully applied to obtain maximum benefit for the species.

Please feel free to contact Scott Jones, Esq if you should wish to discuss any of the issues that have been raised in these comments further. His contact information is Scott Jones, Esq., 508 Ashford Drive, Longmont Colorado 80504; phone 518-281-5810 ; email Scott.jones46@yahoo.com

Respectfully Submitted,

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