Colorado Backcountry Hunters & Anglers

*“The sportsmen’s voice for our wild public lands, waters and wildlife”*

www.backcountryhunters.org

Dana Gardunio

Ouray District Ranger

USDA Forest Service

2505 South Townsend Ave.

Montrose, CO 81401 August 23, 2020

Thank you for the opportunity to comment on the Baldy Mountain Landscape Resiliency and Habitat Improvement Project. I am submitting my comments on this proposal on behalf of the Colorado Chapter of Backcountry Hunters & Anglers, where I voluntarily serve as the Regional Director for the Central West Slope. The Colorado Chapter of Backcountry Hunters & Anglers (BHA) is one of 47 Chapters in the United States and Canada. The Colorado Chapter currently includes 2,800 members.

BHA is a grass roots organization of sportsmen and women who strongly believe in the principals of the North American Wildlife Conservation Model and the value of our public lands for fish and wildlife habitat and the traditional fishing and hunting opportunities that are available to all sportsmen. As a group of sportsmen and women, we advocate for the conservation of wild lands and wildlife habitats on our public lands to support the fish and wildlife and the opportunity for traditional methods of hunting and fishing that challenge us physically and mentally and emphasize the principals of fair chase.

Our membership can also be characterized as families who enjoy undisturbed backcountry for reasons other than hunting and fishing. We cherish the opportunity to venture into areas free of the noise and activity of OHV’s and bicycles to enjoy the peace and solitude of the outdoors with our friends and family on river trips, day hikes, backpacking trips, and horse pack trips. We also strongly feel that these opportunities should not only be available to us now but to our future generations as well.

I am also a 31-year resident of Norwood, Colorado, and retired wildlife biologist from the Norwood and Ouray ranger districts of the GMUG National Forests. I have had the honor and privilege of working and recreating in the area included in this proposal. During the 20 years I worked as the wildlife biologist on the Norwood and Ouray ranger districts, I was personally involved in several big game habitat improvement projects in and around Ridgway and Ouray in cooperation with the BLM and Colorado Division of Wildlife (now Colorado Parks and Wildlife), as well as adjacent private landowners. I was also a member of the Forest Service Interdisciplinary Team that developed the Travel Management Plan for the Uncompahgre Forest, which included management objectives for landscape-level wildlife habitat capability and effectiveness.

The combination of productive habitat and limited human disturbance is essential to the perpetuation of our bighorn sheep, elk, and mule deer populations in this area of the Forest, and the opportunity for high quality backcountry hunting. Our public lands within Ouray County provide these opportunities to Colorado resident and non-resident hunters who help support the local and regional economy of our State.

BHA advocates for the idea of active resource management and conservation of our wilderness and remaining roadless areas on our public lands. We support your proposal to use prescribed fire and mechanical treatments to maintain & improve habitat conditions for big game, and mitigate fire hazard adjacent to developed private property (WUI) in this area of the Forest.  In fact I worked with the BLM, CPW, and private ranch lands adjacent to the north boundary of this project to implement burning, fertilization, and chainsaw work in this same area in the 1990's.

I wish to remind the Forest Service of this inter agency effort and the ongoing monitoring we did at that time, as well as encouraging you and your staff to refer to the bighorn sheep habitat assessment we did in cooperation with CPW prior to that project, which was the basis of our treatments at that time. The burning we did was focused on slopes of gambel oak and mixed mountain shrub, and we did all of the burning in the spring in order to use natural barriers such as snow banks, rock cliffs, changes in vegetation types, and wet north-facing slopes to confine the burn areas, not bulldozer or ATV plow lines.  Most of the time we used a helicopter to light the fires instead of using hand crews in order to access the sites we wanted to burn, and to create enough heat to get a good fire going.  Summer and fall burns were just too difficult and expensive to control, and would have created unnecessary disturbance to soils and infestations of weeds.

The proposed actions in your scoping letter include a variety of mechanical and prescribed fire treatments to improve wildlife habitat conditions and mitigate the risk of wildfire. There is no indication of what time of the year prescribed burning would be implemented. The proposed actions and design features imply that 100 foot buffers will be utilized on the perimeter of all of the proposed burn units. Those 100 foot buffers would evidently be created with either hand crews or mechanical treatments, followed by dozer or ATV plow lines. We would like to see you include an alternative which prioritizes spring burning utilizing natural and topographic barriers and aerial ignition to meet the prescribed burning objectives. We believe this will avoid unnecessary environmental impacts to the soils and watershed, as well as alleviating the establishment and spread of noxious weeds and user-developed trails from the construction of fire lines.

In our opinion, the mechanical treatments (mastication) would help alleviate the risk of wildfire in WUI areas adjacent to developed private lands, or provide a viable method to treat wildlife habitat on gentile slopes.  However, we recommend avoiding any mastication, fire line construction or road improvements within the boundaries of the Baldy roadless area in order to retain its wilderness character. Our primary concern is the mechanical/mechanical option units (F3 F5) in the north end of the Baldy roadless area.  The proposed burning and chainsaw work in the south end (H3, H4 & F9) would likely retain wilderness character and eligibility for wilderness designation.

While we appreciate your efforts to improve big game habitat in this area, we also request that the project EA consider other cumulative effects and foreseeable actions within and adjacent to the analysis area. Although habitat is the basis for viable and productive wildlife populations, other uses and impacts can reduce or negate increased habitat capability.

Those of primary concern are:

1. Ridgway Area Trails group planning effort for single-track mountain bike trails in Ouray county.
2. The existing sheep grazing practices authorized by the BLM and USFS which continue to suppress recovery of bighorn sheep populations through disease transmission.
3. The pending resource allocations and management direction for National Forest lands under the GMUG forest plan revision.

Submitted by:

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Backcountry Hunters & Anglers

*The Sportsman's Voice for Our Wild Public Lands*, *Waters and Wildlife*

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