



August 3, 2022

Black Canyon of the Gunnison National Park • Curecanti National Recreation Area

Re: *Wilderness and Backcountry Management Plan and Environmental Assessment: Black Canyon of the Gunnison National Park • Curecanti National Recreation Area (the Plan)*

These comments are being submitted by the Great Old Broads for Wilderness (Broads), Northern San Juan Chapter. Broads, as a local chapter of a national organization, operates in Delta, Montrose, Ouray, San Juan and San Miguel Counties. Our mission is to protect public lands and waters with an emphasis on preserving habitats for wildlife, sensitive species and potential refugia in the face of climate change. Our chapter of over 300 supporters is volunteer-led and encompasses engaged members from Delta, Montrose, Ouray and San Miguel Counties. We are hunters and anglers, ranchers, wildlife watchers, citizen scientists, recreationists of all kinds, and business owners. Our national non-profit organization, with 40 chapters in 16 states, is dedicated to protection of wild lands and waters with a focus on preserving unfragmented habitat, enhancing biodiversity, and addressing climate change.

### **Wildlife as a Distinct Issue**

Most of the Plan concentrates on visitor experience in wilderness - trails, infrastructure, climbing experience, solitude, number of encounters with other people, etc. There is little examination of the visitor experience with wildlife in wilderness –opportunity to view bighorn sheep, bird watching for common and rare/endangered species, appreciation and study of native plants and exploration of critical/rare communities such as riparian habitat. Broads support these as essential wilderness experiences, worthy of recognition in the Plan.

Appendix E: *Impact Topics Not Carried Forward In The Environmental Assessment* states that Wildlife as an issue was dismissed from further analysis in the environmental analysis. However, the appendix only discusses wildlife issues as they pertain to restoration activities “...which would last six to 12 months during the restoration work periods.”

Broads’ recommendation is that Wildlife should be added as an issue area to be carried forward for detailed analysis in the environmental assessment in Chapter 3. Some of the elements (proper food storage, stay on trail, climbing route closures, etc.) are covered in parts of the Plan and there are some animal monitoring measures. However, Broads feels the Plan should also contain a more detailed examination of the impacts on wildlife from increased recreational use. Some of the specific wildlife issues are the science around flight initiation distance for wildlife species around trails with human encounters, temporal or spatial displacement of wildlife from food and water, and closures/special protections during wildlife breeding, nesting, and rearing young time periods, as well as the connectivity of wildlife corridors especially during migration.

A few resources we have found useful are:

- Colorado Trails with Wildlife in Mind Taskforce. (2021) Colorado's Guide to Planning Trails with Wildlife in Mind. Prepared by Wellstone Collaborative Strategies and Rocky Mountain Innovation Lab. Project supported by Colorado Parks and Wildlife in collaboration with land managers in City, County, State, and Federal government across the State of Colorado. 58pp. (<https://cpw.state.co.us/aboutus/Pages/Planning-Trails-for-Wildlife.aspx>).
- Miller, A.B.; King, D.; Rowland, M.; Chapman, J.; Tomosy, M.; Liang, C.; Abelson, E.S.; Truex, R. 2020. Sustaining wildlife with recreation on public lands: a synthesis of research findings, management practices, and research needs. Gen. Tech. Rep. PNW-GTR-993. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 226 p.
- Hennings, L. 2017. Hiking, mountain biking and equestrian use in natural areas: A recreation ecology literature review. Metro Parks and Nature, Portland, OR <https://www.researchgate.net/publication/320084633>
- Jeffrey L. Marion. March 2019, Impacts to Wildlife: Managing Visitors and Resources to Protect Wildlife. Interagency Visitor Use Management Council. <https://visitorusemanagement.nps.gov>

Broads strongly supports the examination/determination of visitor capacity. We know this is a difficult but crucial endeavor. We understand from page 75 that many data sources are used in determining visitor capacity. It is not clear how quality of habitat for wildlife and impacts of human activity on animals have factored into these visitor capacity determinations. Please provide more clarity on this. We endorse the impacts of human activity on wildlife be included in determinations of visitor capacity.

### **Monitoring Strategies**

Broads is pleased there is a Monitoring Strategy section in the Plan. We would like some clarify in how often the monitoring and subsequent review will be done. We would recommend annual review of all measures, standards and management strategies as outlined in Table 2 of the Plan, and to update the entire Plan in a minimum of five years. With rising visitor use and climate change, reviews are needed on a regular timeframe.

We have three suggestions on ways to strengthen the measures, standards and management strategies for the Natural Quality and Undeveloped Quality categories.

- We believe there should be row(s) in Table 2 that mention taking an inventory of existing plants and animals and to monitor those species over time in all the Management Zones. This would be in addition to the nonindigenous, invasive and extirpated indigenous species already mentioned in Table 2. As stated by NPS early in the Plan, increased visitor use is anticipated, and coupled with climate change and other future inputs, this means that all species (or at minimum indicator species or species of conservation

concern) should be monitored. Particularly important are determining appropriate Management Strategies if/when species numbers decline.

- In Table 2 on Page 58, why does *Change in demography or composition of animal communities* (last row) only cover monitoring and developing management strategies in pinyon-juniper habitat for Inner Canyon and Uplands? And why only monitor landbirds? The Plan on page 13 details that the Upland Zone also contains stands of Gambel oak, Utah serviceberry, and sagebrush, essential habitat for the Gunnison sage-grouse. Animal communities in this habitat should also be monitored. There are undoubtedly other habitats in other zones that warrant monitoring as well.
- In Table 2, on Page 62, Undeveloped Quality, *for Use of motor vehicles, motorized equipment, mechanical transport and landing of aircraft* (Indicator) and *Type and amount of administrative and nonemergency use of motor vehicles, motorized equipment, mechanical transport, or landing of aircraft, such as helicopter use for research, chainsaw use, battery-operated drill, ATV use for grazing management* (Measure), we would like to see the Recommended Standard be 0 occurrences per year for Wilderness Zones. We understand that there may be circumstances when motorized/mechanized equipment may be considered, but these should be very controlled, as indicated by requirements for MRA review. Setting the Standard as  $\leq 3$  occurrences per year, implies that up to 3 occurrences per year are anticipated/acceptable. Broads places a high value on Wilderness and the prohibitions of mechanized/motorized uses in Wilderness areas. If NPS wants to apply different standards/thresholds in backcountry areas, then separate rows should be used.

### **Tribal Consultation**

During the virtual meeting on July 11, there was a statement that local tribes were notified about the Draft Plan. Broads advocates strongly for all Federal and state agencies to actively consult with Tribes during the development of the proposed actions.

### **General Comments**

We know that National Parks provide wonderful opportunities for visitors to see wildlife, particularly in the backcountry and wilderness areas. On Page 186, there is a statement that people may enjoy seeing cattle in their grazing environment. Please provide a statement on the value people may have in possibly seeing a Gunnison sage-grouse in that same area, and the management strategies that could make that possible.

We recommend that visitor education, including Leave No Trace, include a stronger emphasis on specific etiquette when viewing and encountering wildlife in the backcountry and wilderness.

It would be helpful to have an appendix in the Plan which details the species of conservation concern (wildlife and plants) by federal and state (Colorado Parks and Wildlife and Colorado Natural Heritage Program) status, including how each species is managed for resource protection. Table 2 in the Colorado Parks and Wildlife State Wildlife Action Plan is one example, (<https://cpw.state.co.us/aboutus/pages/statewildlifeactionplan.aspx>)

In Chapter 4, under the *List Of Agencies And Groups Consulted During Plan Development*, we did not see mention of either the Colorado Natural Heritage Program (CNHP) or the Colorado Native Plant Society. We urge you to consult with them as you complete the Plan. CNHP manages a large database and ranking system for Colorado species, and both organizations have skilled botanists and ecologists.

On Page 181, last sentence, please replace “Consider” with “Ensure.” Wildlife should be protected through timing operations, both seasonal and temporal, to minimize direct or indirect disturbance on wildlife during nesting, rearing of young, or other important seasons.

Please include more details in the Plan on how NPS will consider climate change impacts for wildlife (plants and animals) and how this may require adaptations of visitor use, in order to maintain or restore intact resilient ecosystems. We appreciate the awesome responsibility NPS has to provide wilderness experiences for visitors as well as protect wildlife and habitat. People need to be the adaptable species.

Sincerely,

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