



February 16, 2021

Thank you for the opportunity to comment on DOI-BLM-CO-S050-2020-0043-EA Cimarron Mountain Club's (CMC) Special Recreation Permit (SRP) application. I write today on behalf of the Northern San Juan chapter of the national organization Great Old Broads for Wilderness (Broads) with our chapter operating in Delta, Montrose, Ouray, San Juan and San Miguel Counties. Our mission is to protect wild lands and waters with an emphasis on preserving large unfragmented habitats for wildlife, sensitive species and potential refugia in the face of climate change. For the following reasons, we oppose your granting this SRP and request you select the No Action Alternative.

Wildlife

Broads advocates for preservation of vast unfragmented habitat and this proposal to allow commercial guiding on the specified BLM parcels totally 3,475 acres negatively impacts such conservation efforts. The most southern border lies adjacent to USFS-managed lands that are outside but contiguous with the Uncompahgre Wilderness Area (and the designated area for avalanche mitigation.) This BLM land is part of a large expanse of wildlife habitat that encompasses varied habitats, wildlife migration corridors – both in terms of vertical elevation and horizontal space and primarily intact ecosystems. As the Environmental Assessment (EA) indicates the BLM parcels under consideration are rugged and not easily accessible except via the ROW already granted CMC by the BLM, and therefore this federal land experiences little recreation use by the public. Though we are grateful that this permit application applies only to CMC residents and their guests and continues to allow public access, we acknowledge that by BLM permitting commercially guided recreation, your EA indicates that visitation on these BLM lands will more than double from an estimated 300 visitors per year to an upper estimate of 720. Your assumption that this increase is no more than 2 people/day is faulty reasoning since this area will be accessed during only specific times of year -primarily in winter for backcountry skiing and snowshoeing and during summer/autumn for hiking. Plus there are already established closure dates from the previous agreement with CMC.

We are particularly concerned about the impact of increased recreation and especially avalanche mitigation on Canada Lynx. Though your EA indicates possible but unlikely impact on Lynx from this SRP, in reality increased recreation use coupled with the noise from avalanche blasting up to 50 days within a winter season is very concerning. Negative impacts on Lynx such as changes in movement and hunting patterns as well

as shifting activity toward hours of human inactivity have been documented. Given impacts of changing climate on wildlife and expanding recreation use across our public lands, it is critical to prioritize preservation of undisturbed, unfragmented habitat where wildlife can find refuge under changing conditions. This SRP will undermine those efforts. If the BLM chooses to approve this SRP (and we hope you will not,) we ask that the existing closure in effect to protect elk calving (May 1-June 15) be extended to July 31 to protect Canada Lynx denning. At an absolute minimum the elk calving closure should be extended to June 30, AND these dates should be evaluated periodically based upon the current scientific data given that reproductive cycles could change with climate effects.

Private commercial operations on public lands

Broads is well aware that outfitter and grazing permits are issued for public lands that benefit commercial ventures. However, in the case of this particular SRP, CMC would enjoy an exceptional advantage or privilege given the inaccessibility of these BLM parcels. Even though the public retains access, your EA admits that such access is particularly difficult given CMC's private ownership of abutting land and the rugged, undeveloped terrain. In effect, CMC would enjoy access to a nearly exclusive playground while posing deleterious effects on wildlife. We recommend allowing CMC to continue to enjoy the benefits of the original ROW while not encouraging further recreational use through permitting of commercial guiding and avalanche mitigation. We support maintaining the wildness of this BLM land.

Monitoring

Within the SRP Project Design Features, the EA states in *#7 SRP permits are monitored on an annual basis to ensure compliance and stipulations could be changed or modified as needed to minimize resource impacts*. Broads is well aware that BLM (like so many federal and state agencies) does not possess adequate resources – human or financial – to monitor permittees with “boots on the ground.” We can attest to this fact since our chapter performs volunteer stewardship duties at the Adobe Badland WSA, and we see the impacts of recreation that are not addressed by the agency due to limited resources. Though BLM may meet with the CMC permittee annually to review the permit, it is highly unlikely that BLM employees will ever have first hand experience on the landscape monitoring the effects of this proposed SRP.

Given the above concerns, Broads urges the BLM to deny this SRP and opt for the No Action Alternative. Thank you for your consideration of our comments.

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Great Old Broads for Wilderness