



Field Office Manager
Uncompahgre Field Office, BLM
Montrose, CO.

September 14, 2021

Re: Preliminary Environmental Assessment DOI-BLM-CO-S050-2021-0032-EA
Montrose County Shavano Gateway Recreation Area Amendment

Thank you for the opportunity to comment on the Shavano Gateway Recreation Area Amendment (Electric Hills). I am submitting my comments on behalf of the Great Old Broads for Wilderness (Broads), Northern San Juan Chapter.

We appreciate the BLM taking a second look at the 2019 Environmental Assessment (EA) regarding issues associated with big game winter range.

Broads recognizes that all users of trails and areas - mountain bikers, hikers, hikers with dogs, equestrians, skiers and all types of motorized vehicles - have an impact on wildlife. We support the BLM extending winter range closures to cover all users equally. Specifically, we support that winter closures in the Electric Hills area should apply to all motorized, mechanized, foot, and horseback use for the purpose of protecting mule deer and elk winter range.

However, we feel that the season for winter wildlife closure should be December 1 through April 30 for ALL users in Electric Hills area. The following points address this concern.

- These dates are in keeping with current, best-science information. The recently published *Colorado's Guide to Planning Trails with Wildlife in Mind* from Colorado Parks and Wildlife (CPW June, 2021), states, "For trails within elk and/or mule deer winter range, implement seasonal timing restrictions for all trail users from December 1 through April 30." This document was prepared by CPW, with contributing task force members from BLM (two members) and other federal, state and local land management agencies. Appendix D states, "The Task Force members reached unanimous consensus and enthusiastic support for the document."
(https://cpw.state.co.us/Documents/Trails/Appendix_D_Planning_Trails_with_Wildlife_in_Mind.pdf)
- We understand that the 2009 Dry Creek Travel Management Plan (Dry Creek TMP) listed winter travel closure on the north side of Highway 90 for the dates of December 1 through April 15. While this is inconsistent with the 2019 EA closure dates for Electric Hills of December 1 through April 30 (south side of Highway

90), the preliminary EA provided no information on practical or logistical challenges, past or present, associated with implementation and enforcement. Consistency could be achieved by updating the Dry Creek TMP to reflect the current best-management practices of wildlife winter use closure from December 1 through April 30.

- On December 31, 2020, CPW put out a news release on winter closures from December 1 through April 30 for the Billy Creek State Wildlife Area. The release included some compelling statements about the stress on winter populations of elk and mule deer due to all types of recreational use during winter. (<https://cpw.state.co.us/aboutus/Pages/News-Release-Details.aspx?NewsID=7685>) Billy Creek is located in the same region as Electric Hills and should be a model for winter travel closures to protect wildlife.
- The Preliminary EA recognizes that. "The reduced time frame of April 15 would ultimately expose some animals to late winter impacts." The additional statement, "... it is assumed there will be a significant net benefit relative to overall lack of disturbance by human use between December 1 and April 15." is not supported by any use data or other information.
- While Table 3 of the EA discusses trail availability mileage, there is no discussion of the potential impact of increased recreational use from April 16 to 30 on wintering elk and mule deer.

Broads also request that a full range of effective measures be required by all management agencies (federal, state, and county) to ensure compliance with winter closure. All trailheads and other trail access points need to be clearly signed and heavy-duty locking gates or other closure structures should be required. All user-created trails and roads should be decommissioned. And routine patrols and enforcement must be implemented. These methods to ensure compliance should be put in place concurrently with trailhead and trail development.

Broads appreciate the BLM continuing to recognize the impacts of recreation on wildlife habitat, especially on wintering big game.

Respectfully,



Sallie Thoreson, Leadership Team Member
Northern San Juan Broadband
northersanjuanbroadband@gmail.com