



July 17, 2022

Dear Senator Bennet,

On behalf of the Northern San Juan chapter of Great Old Broads for Wilderness (Broads,) we applaud the multi-year efforts of your office and the Gunnison Public Lands Initiative (GPLI) stakeholder group in advancing your initiative to draft legislation entitled the Gunnison Outdoor Resources Protection (GORP) Act.

With the majority of our members in Montrose and Ouray Counties, we specifically want to lend our enthusiastic support for the proposed Wilderness Areas that constitute our nearby viewsheds, recreation areas and critical wildlife habitat, namely Turret Ridge, Little Cimarron and Failes & Soldier Creeks as additions to the existing Uncompahgre Wilderness. We recognize these landscapes as possessing wilderness character and are particularly supportive of designating some mid-elevation lands for wilderness as these ecotypes are sorely underrepresented in Colorado as well as the National Wilderness system. We also appreciate that these parcels provide critical corridors for big game migrating between winter and summer range as well as habitat for Canada lynx and moose. The town of Ridgway and Ouray County unanimously endorse these proposed designations as well as our membership.

Our Delta County members strongly recommend the GORP Act include protection of landscapes in the North Fork with particular attention to Pilot Knob and Clear Fork given their wilderness characteristics, wildlife habitat and recreation values. Removal of these acres from potential oil and gas development is critical to the agricultural economy, water quality and quality of life enjoyed in the North Fork Valley.

Broads wholeheartedly supports Section (k) that discusses seasonal closures for OHVs and bicycles. We believe this can be strengthened by stating, “federal land management agencies should develop, implement, and enforce seasonal closures for all users on roads and trails in consultation with Colorado Parks and Wildlife (CPW).” CPW has a Guide that is a good resource. The 2021 version of *Planning Trails with Wildlife in Mind* contains the best practices and science for Colorado’s land managers, trail advocates, and conservationists engaged in trail planning (<https://cpw.state.co.us/aboutus/Pages/Planning-Trails-for-Wildlife.aspx>). For example, CPW recommends closures of trails for all users generally from April 15 through June 30 during calving time periods. The Guide provides more detailed information for specific species, such as bighorn sheep, “For any trail within bighorn sheep production areas, implement seasonal timing restrictions for all trail users from April 15 through June 30 (Rocky Mountain bighorn sheep) and February 1 through May 1 (desert bighorn sheep). For any trail within bighorn sheep winter

range habitats, implement seasonal timing restrictions for all trail users from November 1 through April 30.”

We fully endorse the designation of Wildlife Conservation Areas (WCAs) to protect wildlife habitat. Since the explanation of where temporary roads may be constructed does not include WCAs, we conclude that road construction will not be allowed in WCAs. We support this action. Temporary roads may impact wildlife during construction and during use. Furthermore, decommissioning of roads, even within the designated three-year time-period, can lead to continued harmful impacts to wildlife.

We support the designation and protections within the Rocky Mountain Research and Education Area (RMSREA). The Rocky Mountain Biological Laboratory has, over the years, provided much good science on which to base environmental and land use decisions. This wealth of data helps all of us see the impacts of climate change. It is crucial to support the continuation of the station by protecting the land around the station where research takes place.

We appreciate that grazing interests are considered in the plan. We also know that science indicates that grazing can negatively impact native wildlife, in particular Gunnison sage-grouse and bighorn sheep, and that our severe drought and climate change necessitate continuing adjustments to grazing allotments, operating instructions, and regulations. We strongly advocate that the GORP Act include provisions that there be consistent, regular review under NEPA of all grazing permits when they come up for renewal including updated Land Health Assessments and Environmental Assessments (EA) that analyze the environmental effects and wildlife impacts of grazing on allotments in our public lands. In particular, we wish to emphasize the critical importance of NEPA review of domestic sheep allotments in proximity to or overlapping native bighorn sheep home range. The transmission of respiratory disease from domestic sheep to native bighorn is well documented and poses the most significant threat to Colorado’s bighorn. Reports of bighorn foraging 10-20 miles are not uncommon and risk of contact analysis must be conducted in order to ensure a sustainable, healthy bighorn population. Reliance on best management practices has proven insufficient to maintain separation of native and domestic sheep. We are most concerned about the Sapinero Mesa and Goose Creek allotments that overlap Lake Gulch & Cebolla Creek WCA impacting bighorn as well as Gunnison sage grouse. Equally concerning are the allotments that overlap with two of the three landscapes proposed as additions to the Uncompahgre Wilderness. There are also two domestic sheep allotments whose boundaries, as mapped by CPW, are within 2 miles of Erickson Springs Wilderness addition, Beckwiths Special Management Area, and Horse Ranch Park Recreation Management Area. We are aware of observations of bighorn closer than 2 miles to these allotments.

Broads supports the intent of the plan to consider quiet uses (defined in the Frequently Asked Question section of the GORP Act website (<https://www.gorpact.org/faqs>) as “including horseback riding, Nordic skiing, bird and wildlife-watching, and hiking.” Again, the FAQ continues with the statement “The proposal also uses a variety of special designation areas to ensure a myriad of quiet recreation opportunities in the Gunnison Basin are protected into the future.” We would like to see more clarity on this topic to ensure that quiet uses are separated or receive equal emphasis in trail planning and recreation management as motorized and mechanized use.

We also appreciate the efforts to reroute or redesign mountain bike trails to protect important wildlife areas. The above-referenced document *Colorado's Guide to Planning Trails with Wildlife in Mind* should be consulted as a guiding document as well as the U.S. Forest Service document *Sustaining Wildlife With Recreation on Public Lands: A Synthesis of Research Findings, Management Practices, and Research Needs* (<https://www.srs.fs.usda.gov/pubs/61721>)

The use of e-bikes should be addressed in the plan. E-bikes can be a hazard to wildlife and could pose a safety hazard and disruption to hikers and horse riders. Our recommendation would be that e-bikes not be allowed on trails in backcountry areas, in particular not in WCAs.

We appreciate the opportunity to offer comments on the draft legislation and want to thank you and your staff for this large landscape effort to protect public lands in Gunnison County. Such comprehensive initiatives are vital to protecting biodiversity and climate refugia for all species in these dire times of species extinction, drought, wildfire and climate change.

In wild gratitude,

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