May 21, 2017

RE: Signal Peak Trails Plan

Emailed on May 21 to: blm_co_gfo_nepa_comments@blm.gov

Please accept the following comments as part of the formal record on the proposed Signal Peak Trail Development plan on behalf of Colorado Backcountry Hunters & Anglers.

Backcountry Hunters & Anglers (BHA) is the sportsmen’s voice for our wild public lands, waters and wildlife and we seek to ensure North America’s outdoor heritage of hunting and fishing in a natural setting through education and work on behalf of fish, wildlife, and wild places. With over 250,000 members and supporters and more than 1,000 active Colorado members, sportsmen are increasingly looking to BHA as the leading voice on public land management issues. We represent the challenge, solitude, and adventure that only the backcountry can provide and we are working hard with boots on the ground at all levels to ensure that our roadless areas and backcountry are protected for the fish and wildlife that thrive there.

Our Gunnison area membership, which now numbers over 100 members, is dedicated to working collaboratively with other public land user groups on public land management solutions, which conserve the large tracts of intact habitat that make the Gunnison Basin a hunting and fishing destination is maintained. Healthy public lands help sustain healthy fish and wildlife populations, and the 615 jobs that hunting and fishing currently support in Gunnison County (5% of total jobs in county). We are concerned that the scale of proposed trail development in places like Signal Peak, which provide critical wintering habitat for elk and mule deer, will negatively impact wildlife populations and the $53,140,000 in total economic impact that hunting and fishing has in Gunnison County each year.

While Colorado BHA is not opposed to some mountain bike trail development in the Signal Peak area, we are concerned with the current scale of the project and the impacts that new trail development would have on the following:

- Gunnison Sage Grouse: The proposed trail development overlaps with Tier 1, occupied Gunnison sage grouse habitat. We strongly believe that this area can and should be avoided. While we understand that room for some level of trail development was provide through the Candidate Conservation Agreement, research has shown that ongoing human disturbance and development within active (see literature below) lek sites can have significant long-term negative impacts on sage grouse populations. The proposed trail development directly takes away from the significant investment (both time/effort and financial) sportsmen, CPW, NRCS, ranchers and others have put in to protection of sage grouse. Those proposing the trail development have a financial obligation to provide mitigation and/or habitat protection funding to offset the known loss of habitat that will result from the proposed trail development. A mitigation plan accompanied by habitat funding
should be required by the BLM. We also ask the BLM to limit the scope of trail development within the mapped occupied area and zone with active leks to one access trail. The existing Ridge Trail West provides sufficient access to the area, while still allowing for new mechanized use outside of the occupied range. We would also like to see an enforcement and mitigation fund set-up by the trail proponents to help ensure seasonal wildlife-related closures are honored and to ensure that restoration costs related to any proliferation of non-system routes in the area can be funded. Please provide analysis of how enforcement will be handled for proposed trails.

- Offsets Needed: The BLM plan needs to better consider the change in human, trail and road density in the area and propose some offsets for the increase in habitat fragmentation, wildlife disturbance and watershed sedimentation that will result from the development of new trails in the area. More should be done to convert BLM system roads (such as 3218.a, 3108.b, 3108.c, 3108.d, 3211.c, 3218) to trails, thereby reducing overall disturbance and fragmentation in the area. We ask the BLM to include an analysis of potential offsets and/or realignment using existing motorized routes as part of the alternatives. The current layout with proposed trails running parallel to existing motorized route is problematic due to the fragmentation it will cause and alternatives need to be reconsidered. All unauthorized trails within the planning area MUST be obliterated before any new trails are developed.

- Trail maintenance fund needed: The BLM and CPW currently do not have the financial resources to maintain the trails and roads that are already developed. We question the logic of developing more trails without first creating a fund to maintain these trails and enforce their use. An analysis of annual maintenance and enforcement costs should be included, as well as identification of potential sources of funding.

- Seasonal Closures: The proposed plan leaves a number of routes open during early spring when animals are most prone to human disturbance. The majority of the trail development area is mapped critical winter range for mule deer. The BLM should ensure that none of the new trails open earlier than March 15th and that this date can be lengthened, as determined necessary by CPW biologists. We ask the BLM to provide a record of historic wildlife-related closure dates upon which a reference for future seasonal trail closures can be made. We also ask that the BLM evaluate a tiered closure area to minimize the footprint of trails open during the early spring and winter.

- Private Land Wildlife Use Monitoring: A baseline analysis of historic wildlife conflicts on neighboring private lands should be included, and a plan for monitoring and offsetting any increase in private land conflicts should be included. A contingency plan should be developed whereby trail proponents will be financially responsible for any increase wildlife related damages on neighboring private land and/or the trail shall be closed until payments are made. A plan for how/when signs shall be installed shall be provided.

Backcountry Hunters & Anglers understands the need to balance the growing demands for mountain bike trail use, and we believe there is some merit to catering to this demand on public lands near the town of Gunnison. However, in doing so it is critical that the BLM works to minimize the impacts on the local wildlife and watershed by minimizing the
footprint of the proposed development. To this end, we believe more needs to be done to work towards consolidating new and existing routes. We also feel strongly that any planned development needs to be coupled with a financial plan for how trail signage, maintenance, enforcement, wildlife habitat mitigation and wildlife related conflicts will be covered—a plan that should be put in place in coordination with the trail proponents. No trail construction should be allowed until such a plan has been developed.

Gunnison County’s healthy fish and wildlife populations currently sustain a robust economy and lifestyle. As new development is proposed within areas like Signal Peak, which provide critical wildlife habitat for wintering mule deer and elk, as well as year-round habitat for the listed Gunnison Sage Grouse, the BLM has a responsibility to minimize the cumulative impacts that new development may have on these species, to the greatest extent possible. More work needs to be done to ensure this balance is struck, and we’re willing to work with the BLM and other stakeholder groups on a plan that better achieves this balance.

Sincerely,

David A. Lien
Chairman, Colorado
Backcountry Hunters & Anglers
The Sportsman's Voice for Our Wild Public Lands, Waters and Wildlife
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References:

Economics:
Economic Impact of Hunting and Fishing – Gunnison County
https://cpw.state.co.us/Documents/About/Reports/08DOWEconomicImpactReport.pdf

Wildlife & Recreation:

http://www.cabdirect.org/abstracts/19981802087.html;jsessionid=36F44711545BEB5076E5E25F5D47A46C