

July 20, 2023

To:

Region 2 Forester Frank Beum, Rocky Mountain Region
Forest Supervisor Russ Bacon, Medicine Bow - Routt National Forests
Forest Supervisor Scott Fitzwilliams, White River National Forest

cc:

The Honorable Senator Michael Bennet
The Honorable Senator John Hickenlooper
The Honorable Representative Joe Neguse
Colorado Division of Natural Resources Director Dan Gibbs
Colorado Parks and Wildlife Director Jeff Davis

Subject: Urgent action requested to aid recovery of northwest Colorado ungulate herds

Rocky Mountain Region Forester Frank Beum
1617 Cole Blvd.
Lakewood, CO 80401

Dear Regional Forester Beum and Forest Supervisors Bacon and Fitzwilliams,

We, the undersigned organizations, write to you on behalf of tens-of-thousands of Colorado hunters, anglers, conservationists, and outdoor enthusiasts. We do so to respectfully request urgent action to address an emergency situation regarding big game sustainability in Northwest Colorado.

Northwest Colorado just experienced an unprecedented winter that will have severe and lasting repercussions for local wildlife. [According to CPW](#) (Colorado Parks and Wildlife), “This past winter had the most severe snow conditions residents saw in the past 70 years for the northwest corner of the state, ranging from Rangely to Steamboat Springs and the Wyoming state line – even surpassing the severe winter of 1983-84. Multiple heavy snowstorms with strong winds generated hard-packed snow that severely buried food for elk, mule deer and pronghorn.”

CPW further states, “The Severe Winter Zone is an area known for some of the largest elk herds in the nation, and severe winter conditions have resulted in high elk calf and above-average cow mortality. Survival rates are the lowest CPW has ever documented and below what CPW previously thought possible in elk.”

Due to these unprecedented winter conditions, CPW has sharply reduced big-game hunting licenses in what they refer to as the “Severe Winter Zone,” an action [publicly supported by the CWCP alliance](#) (Colorado Wildlife Conservation Project) and several other member organizations. In our CWCP [letter to the Parks and Wildlife Commission](#) we stated, “We wholeheartedly support the agency’s recommendations on license reductions and believe we have an alarming emergency – particularly in the northwest region – as it relates to the long-term sustainability of our ungulate herds. With wildlife conservation as our top priority, we believe that additional license cuts could be necessary to restore populations to levels that would support historical hunter opportunity.”

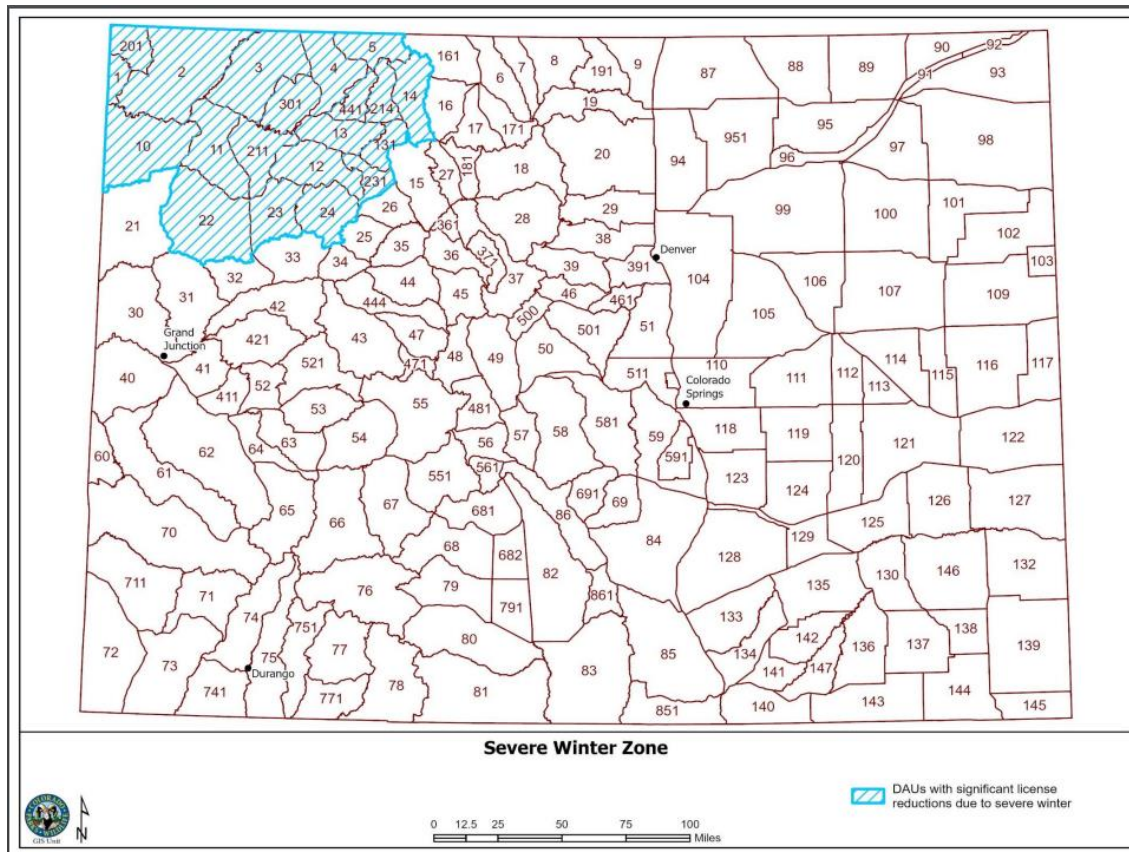


Figure 1 shows Severe Winter Zone. Image courtesy of CPW

Big game license reductions in the Severe Winter Zone include:

- Male and either-sex deer licenses were reduced by 5,000 (-48%) combined in D-2 (Bears Ears), D-6 (Rangely), and D-7 (White River). Female licenses were reduced by 2,900 (-94%) combined and to the minimum of 10 licenses per hunt code in D-2 (Bears Ears) and D-7 (White River).
- Anterless elk license recommendations were reduced in E-2 (Bears Ears) by 5,600 (-89%) with all public cow hunts reduced to the minimum of 10 licenses per hunt code. For E-6 (White River) CPW recommended a reduction of 8,700 (-63%) anterless licenses. For E-21 (Rangely) the reduction was 400 (-60%) anterless licenses.
- Pronghorn male and female license quotas were reduced to the minimum of 10 per hunt code. Pronghorn buck licenses were reduced by 1,100 (-74%) and doe licenses were reduced by 700 (-83%) combined for all DAUs. Affected DAUs include PH-9 (Great Divide), PH-10 (Maybell) PH-11 (Sand Wash), and PH-34 (Axial Basin).

Over-the-counter second and third rifle elk hunting seasons were shortened to five days only. The season dates were shortened to Oct. 28, 2023 – Nov. 1, 2023, and Nov. 11, 2023 – Nov. 15, 2023, respectively, if hunting in GMUs 3, 4, 5, 11, 12, 13, 14, 23, 24, 131, 211, 214, 231, 301 and 441. [Cutting 32,000 limited big game licenses compared to last year and shortening the over-the-counter elk hunting seasons](#) shows the seriousness of the issue. It is unlikely that a single year decrease will be sufficient to address the impacts from the severe winter however. “The goal of the cuts is to try to bring (the herds) back to healthy, robust populations, and that’s

going to be a multi-year challenge,” CPW District Wildlife Manager David Rehak Suma said to the [Steamboat Pilot](#).

We note that MBRNF (Medicine Bow – Routt National Forests) offer critical habitat to D-2, E-2, and PH-9 herds, while WRNF (White River National Forest) offers the same to D-7 and E-6 herds. E-6 (White River) and E-2 (Bears Ears) elk herds are respectively the largest the second largest elk herds in Colorado, also making them the largest in the world.

It is due to MBRNF and WRNF playing such a critical role to these suffering herds that we are asking that the Forest Service take proactive action to ensure the effectiveness and suitability of ungulates’ winter, summer, and production habitats under their management.

While most winterkill occurs at the very end of a winter season, survivability is often dependent on the size of an ungulate’s fat stores accumulated during summer and fall. For [example](#), up to 30 percent of a deer’s winter energy requirements can be met through body fat. Furthermore, a study of Rocky Mountain elk by [Cook \(2004\)](#) found, “Summer-autumn nutrition significantly affected calves and their mothers. Growth of calves in the low and medium nutrition groups ceased by mid-September and late October. By December, calves in the high nutrition group were 40% and 70% heavier than calves in the medium and low groups, respectively. Cows in the high nutrition group accumulated about 75% and 300% more fat than cows in the medium and low groups by mid-October. Eighty percent of cows in the low nutrition group failed to conceive, and those in the medium group bred 10-14 days later than cows in the high group.” Additionally, **“Summer-autumn nutrition largely determined calf body size at the start of winter and, consequently, determined the proportion of winter survived. Survival of cows over winter was as related to body fat at the onset of winter as it was to nutrition during winter. Thus, our data suggest that the limiting effects of summer-autumn nutrition on populations may be greater than often assumed, perhaps greater than those during winter in some ecosystems.”** [Emphasis ours]

For the recovery of these herds, it is important that human disturbance be minimized in critical habitat, whether winter or summer.

We are requesting that the Forest Service take the following three actions in MBRNF and WRNF forests until herds fully recover:

1. Where the Forest Service has instituted seasonal closures, that the dates of the closures be updated to reflect those in [Colorado’s Guide to Planning Trails with Wildlife in Mind](#). These dates may be found in [Appendix A](#). These guidelines were jointly developed by CPW, the Forest Service, and other land managers and represent the best management practices for protecting sensitive habitat.

An example of a seasonal closure to be updated can be found in the Buffalo Pass area of MBRNF. The current elk production (calving) area [closure](#), which includes Flash of Gold and BTR trails, extends from May 1 to June 15, whereas [modern planning guidelines](#) specify that the closure be retained through June 30th.

Human disturbance in elk calving areas has been shown to have a severe impact on elk calf survival rates. A [CSU study](#) performed in the Vail area observed that elk calf/cow ratio

plummeted by nearly 40% as a result of simulated recreation use in elk calving areas. Reproduction levels during the treatment period were determined insufficient to maintain a stable elk population. The [second half of the study](#) involved removing the human disturbance component. With the human disturbance removed the calf/cow ratios rebounded to their pre-treatment levels. With just over 8 disturbances per cow elk resulting in nearly 40% fewer surviving calves, each disturbance averaged nearly 5% probability of the death of a calf.

A [subsequent study](#) found that a June 16 opening date impacts 55-76% of the elk calves where a July 1 open date reduces that impact to 11-18% of the elk calves. A graph showing the percentage of elk impacted vs. opening dates is shown below:

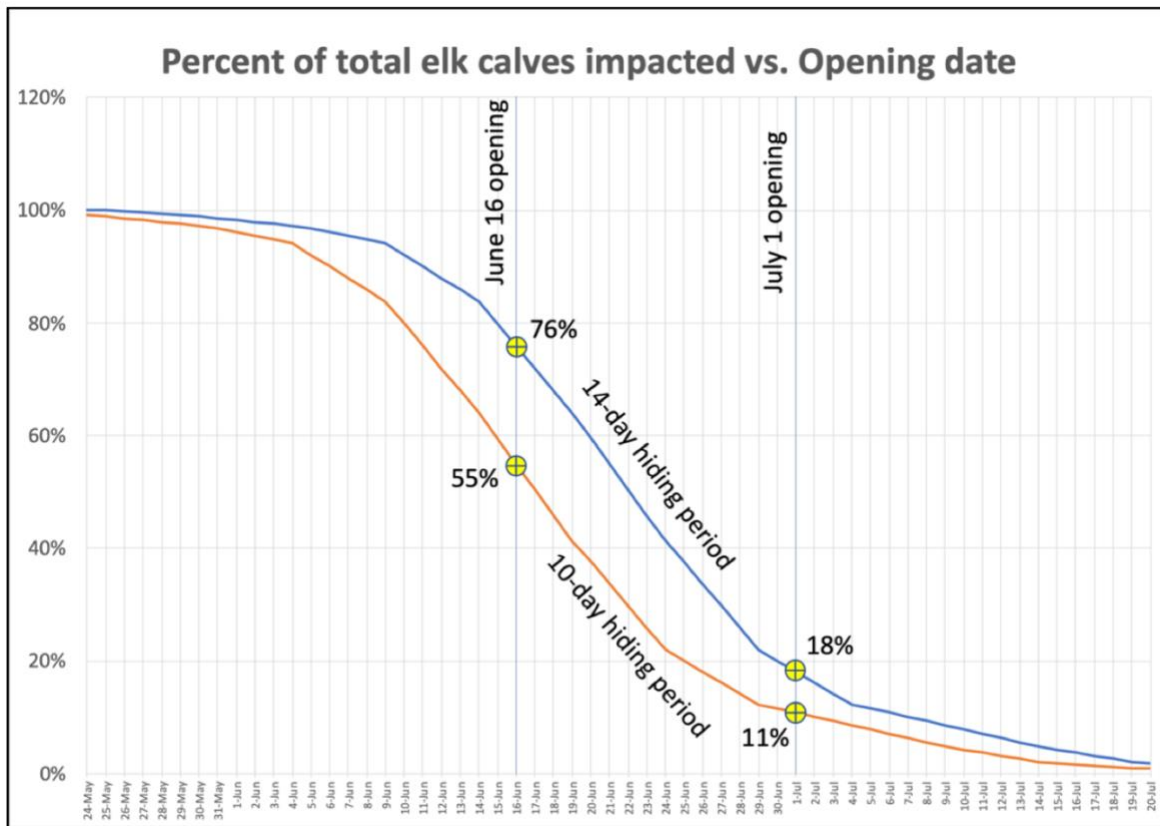


Figure 2 shows the percent of elk calves impacted vs. opening date of an elk production area closure.

The above example pertains to production area closures. There are also [numerous winter closures](#) that extend only through April 15, however modern guidelines recommend closures through April 30. This past winter shows why those two additional weeks are critically important. The severe winter kept ungulates on their winter range for an extended period. Recreational use during this time is deleterious to elk and deer as they expend precious calories avoiding humans instead of surviving. This is a period where there was a high degree of ungulate mortality.

2. Upgrade all voluntary seasonal closures to mandatory closures. The Forest Service has numerous closures labeled as “Voluntary”. As an example, a list of voluntary and mandatory closures from Routt National Forest can be found [here](#). Many of the voluntary closures include habitat just as critically important as those found in the mandatory closure areas. Furthermore, we have found a propensity for users to consider voluntary closures as mere suggestions and to

violate the closures frequently. Below is a photo of the voluntary closure sign at Silver Creek Trailhead on Routt County Road 16 during the closure. It clearly shows the footsteps of hikers who viewed the sign, and then continued into the closed area.



Figure 3 shows fresh hiking tracks next to a posting of a Voluntary Winter Closure at Silver Creek Trailhead in Medicine Bow – Routt National Forests.

The violation above was discussed robustly on social media. A significant number of trail users defended entering areas under a voluntary closure. Their interpretation is that a voluntary closure means to use one's own judgment, and that the area is otherwise good-to-go. Voluntary closures are simply not as effective as mandatory closures and therefore must be upgraded to mandatory closures to attain a higher level of compliance and resource protection.

3. Halt the Mad Rabbit Trails Project. CWCP [previously expressed our concerns](#) about the proposed Mad Rabbit Trails Project in our comments regarding the Draft EA. We were joined by seventeen member organizations in opposition to the draft proposal. Many of our concerns centered around the proposed project's outsized impact to elk habitat. The recent severe winter and ungulate mortality has only heightened our concerns that this is an ill-conceived project that unduly threatens local wildlife.

The Mad Rabbit proposal specifies the development of new mountain bike trails in elk calving areas and elk summer concentration areas. Scientific [peer-reviewed studies](#) performed by the Forest Service has shown trail-based recreation can cause disturbance to elk up to 1500 meters away, leading to habitat loss, compression, and fragmentation. The project area has already seen deleterious impacts from previous recreational development in the area. There is a declining trend in both the number of elk classified during annual winter classification flights and the observed calf/cow ratio.

Furthermore, there are 21 miles of proposed Mad Rabbit trails in CPW-indicated elk calving areas that the Forest Service is proposing to have *no seasonal closures at all*. The density of proposed trails in the Ferndale area results in over 3 linear miles of trails per square mile of elk habitat, far exceeding the 1 linear mile of trail per square mile metric specified in Colorado's "Planning Trails with Wildlife in Mind."

In light the current severe winter crisis impacting the E-2 Bears Ears herd, to further reduce and fragment critical elk habitat as proposed by Mad Rabbit runs counter to CPW's efforts to recover the impacted herds.

For the reasons stated above, we support CPW's license reductions but recognize that additional cooperative, collective action by a multitude of land managers, landowners, ranchers, recreation user groups, guides, and outfitters is needed before the northwestern Colorado ungulate herds will fully recover. For these reasons, we request that the Forest Service perform the complementary actions detailed above. The CWCP deems all of these are crucial to ensure herd recovery and we appreciate the Forest Service's shared commitment to conserving wildlife and wildlife habitat for generations to come.

Sincerely,
Members of the Colorado Wildlife Conservation Project

Backcountry Hunters and Anglers
Coloradans for Responsible Wildlife
Management
Colorado Outfitters Association
Colorado State Muzzle Loading Association
Colorado Trappers and Predator Hunters
Association
Colorado Wildlife Federation

Keep Routt Wild
Muley Fanatic Foundation
National Wildlife Federation
National Wild Turkey Federation
Rocky Mountain Big Game Recovery
Safari Club International
Theodore Roosevelt Conservation
Partnership