

March 10, 2019

Colorado Parks & Wildlife Commission

Denver, CO

Dear Chairman Howard and Members of the Colorado Parks & Wildlife Commission:

At the January Commission Meeting, I presented my own observations of declining elk populations in GMU 14, which I believe are a result of the Buffalo Pass Trails Project and the Mount Warner trail development in Routt National Forest, as well as the Emerald Mountain trail network. I also expressed serious concern over the Mad Rabbit Trails Proposal--also in GMU 14, in Routt National Forest. The Mad Rabbit Trails Proposals—which is currently in the pre-scoping period—would permanently fragment many square miles of sensitive elk habitat. I highlighted my concern for how outdoor recreation and high use trail systems could be one of many serious factors affecting elk recruitment. Outdoor recreation—of all types—could very well be one culprit in struggling recruitment across the state, as recreational uses continue to grow in unprecedented ways.

In January, this Commission asked what I thought could be done with regard to human disturbance and growing outdoor recreation in elk habitat and the potential negative impacts to elk populations. I have given serious consideration to this request and I would like to offer the following:

1. The evidence of declining cow/calf ratios across the West, and specifically in Colorado, is real and significant. The importance of healthy and productive elk populations to the people of Colorado and its visitors cannot be underscored enough. I believe that CPW staff has provided data to the Commission previously, which highlights the financial significance and implications of declining elk populations. Perhaps it is time for this Commission to refresh its knowledge regarding this critical and significant financial issue. This is my first suggestion.

2. Secondly, I would like to thank this Commission and the agency for implementing the six-year research projects on elk demographics and survival in Eagle, Pitkin and Routt Counties, which are sure to provide us with elk recruitment and abundance data. I think it's noteworthy that DAU E-2 serves as the control area for elk research, and, it's my understanding that E-2 is studied more than any other DAU. Having said that, I would like to pose a question regarding the Mad Rabbit Trails Proposals: Wouldn't it be unfortunate if the premature development of the Mad Rabbit Trails project—and the associated human disturbance—diluted or disqualified E-2 from functioning as the control in important and significant elk recruitment research?

3. Next, I would encourage this Commission to schedule a workshop/presentation by CPW staff regarding the present state of information and knowledge regarding human disturbance and elk populations. I think an informative and objective presentation would include three branches of the agency.

-Field Operations because they are responsible for land use commenting.

-The Terrestrial section because they are responsible for population monitoring and hunting management of elk.

-The Research section because they plan and implement the studies which yield quantifiable information which informs management decisions.

4. Lastly, I would like to encourage this Commission to consider crafting a Resolution that acknowledges the impacts human disturbance has on elk populations, underscores CPW's research knowledge regarding elk populations, endorses CPW land use comments regarding the Mad Rabbit proposals and ultimately encourages federal land management agencies to consider such a Policy Resolution in the NEPA analysis required for authorization of human activities that have the potential to have significant impact. In other words, I think a Policy Resolution would be helpful in spelling out CPW's position on the issue of human disturbance with respect to elk and other wildlife.

Such a Resolution—crafted by this policy setting Commission—would underscore the importance of wildlife to federal land managers and highlight CPW staff recommendations. It would provide further support, direction and clarification as the issue of human disturbance, habitat fragmentation and elk population declines is continually set before land and wildlife managers tasked with balancing resources, user groups and interests.

Thank you for this opportunity and for your consideration of my suggestions. Feel free to contact me with any questions or updates.

Sincerely,

Luke Wiedel

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