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Title:

Comments: To Whom It May Concern:

I am a local sportsman who frequents the GMUG and a life member of The Rocky Mountain Elk Foundation, Mule Deer Foundation, Backcountry Hunters & Deer Foundation, Backcountry Hunters & Deer Foundation, Backcountry Hunters & Deer Foundation. The GMUG planning area accounts for almost 20% of the mule deer and elk populations in the state of Colorado. The GMUG Forest Plan must take very seriously critical habitat needs with a strong emphasis on wildlife as well as the enormous economic benefits which hunting and fishing bring to the local community. That said, many of us are extremely concerned about the long term capability of elk and mule deer habitats on the GMUG.

I support Alternative B, with a few added suggestions for improvement.

I strongly support the following within the Draft Forest Plan:

1) The designation of Wildlife Management Areas with focused management. I support the Wildlife Management Areas (WMAs) identified by the USFS in "Alternative B" and the plan components proposed for their management. The WMAs identified in Alternative B comprise nearly 25% of the GMUG and are based upon the spacial and temporal association of mapped big game seasonal habitats and migration corridors mapped by Colorado Parks and Wildlife (CPW). Providing special management for these areas that limits the density of both motorized and non-motorized routes is critical for maintaining the habitat connectivity necessary for unrestricted big game migratory movements between mapped seasonal habitats across the landscape.

More specifically, I support the following plan components proposed by the USFS to provide the special management needed for WMAs and to enhance big game populations forest-wide:

- · A Standard limiting the density of permanent motorized and non-motorized routes in WMAs to 1 linear mile per square mile (Standard MA-STND-WILDF-02). This standard requires maintaining a route density that is low enough to protect the existing habitat function and habitat connectivity within WMAs while allowing necessary access for temporary forest management and habitat improvement activities. I strongly support this standard for WMAs and recommend that USFS applies the same standard to CO Roadless Areas and mapped high priority big game seasonal and migratory habitats when not covered by other plan direction.
- · Objectives (both within WMAs and forest-wide) that require improving habitat connectivity through vegetation management, removing unneeded structures, and eliminating redundant routes to reduce route densities (MA-OBJ-WLDF-03 and FW-OBJ-SPEC-03).
- · Desired Conditions (both within WMAs and forest-wide) that recognize the need to maintain large blocks of security habitat and undisturbed migration and movement corridors for big game (MA-DC-WLDF-01 and FW-DC-SPEC-12)

I have the following suggestions for improvement within the Forest Plan:

1) Connectivity - To maintain consistent landscape-level management across public and private administrative boundaries, habitat connectivity across the landscape, and the function of CPW-mapped high priority big game habitats consistent with state efforts, the USFS should incorporate plan components in the Connectivity section of the Draft Forest Plan that parallel CPW's recommendations with respect to limiting route density to 1 linear

mile per square mile in migration corridors and the highest priority big game habitats (see Sporting Groups 6/2/2021 comments on Working Draft).

- 2) Big Game Population Objectives Given the importance of hunting on the GMUG both regionally and nationally, the GMUG staff and CPW should continue to work closely together to ensure that habitat management activities on the forest are consistent with CPW's herd management objectives. The USFS should add an additional Guideline regarding working collaboratively with CPW to achieve big game populations objectives and sustainable harvest that meets or exceeds average big game harvest success rates across Colorado.
- 3) Bighorn Sheep I am concerned about the vulnerability of our bighorn sheep herds on the GMUG to disease transmission from contact with domestic sheep. Bighorn sheep have a limited population size and restricted range on the GMUG due to the number of distribution of grazing allotments allocated to domestic sheep grazing both on the GMUG and on surrounding lands. Bighorn sheep populations on the GMUG cannot expand geographically and are at risk of catastrophic disease related die offs from contact with domestic sheep when they do. For these reasons, bighorn sheep need to be identified and managed as Species of Conservation Concern on the GMUG.
- 4) Colorado Roadless Areas I am also concerned about conserving the integrity of our remaining wild lands that are necessary for maintaining big populations, stream quality, and our heritage and privilege to hunt and fish in large intact and connected landscapes. With exponential recent growth in outdoor recreation, it has become increasingly crucial to conserve our remaining wild places appropriately, while planning for the future. Big game and other wildlife rely on functional, interconnect roadless habitats as they migrate across the landscape between seasonal ranges or migrate upstream. I believe it is urgent to purposely direct management toward the conservation of our remaining Roadless Areas and to emphasize wildlife habitat management within the areas identified as Roadless. The lands included in the Colorado Roadless Act continue to be subject to unrestricted trail development that increasingly degrades their roadless values. The USFS should incorporate specific plan components consistent with the Colorado Roadless Rule (36 CFR 294 Subpart D) that protects the roadless values of these lands by setting limits on new trail development in these areas. If we don't do this now, it will only become more difficult to maintain these area's roadless character in years to come.

Thank you for your consideration.