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Comments: Wildlife Management Area - MA 3.2 (WLDF)

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[ldquo]Desired Conditions

MA-DC-WLDF-01: Large blocks of diverse habitat are relatively undisturbed by routes, providing security for the life history, distribution, and movement of many species, including big-game species. Habitat connectivity is maintained or improved as fragmentation by routes is reduced. See also Native Species Diversity FW-OBJ-SPEC-03.

[ldquo]Standards

MA-STND-WLDF-02: To provide security habitat for wildlife species by minimizing impacts associated with roads and trails, there shall be no net gain in system routes, both motorized and nonmotorized, where areas are already in exceedance of the 1 mile per square mile limit [8] as calculated within this management area boundary. Within the Flattops Wildlife Management Area on the Gunnison Ranger District, there shall be no new trail development. Exception: this does not apply to administrative routes.

[ldquo][8] Trail density sources cited: Expert opinion; Canfield et al. 1999; Miller and Hobbs 2000; Lenth et al. 2008; Reed and Merenlender 2008; Rogala et al. 2011; Preisler et al. 2013; Weidman and Bleich 2014; Wisdom et al. 2018;[rdquo]

Disturbances are caused by human activity using roads and trails, i.e., [ldquo]routes[rdquo]. Routes themselves do not cause disturbances. For example, Preisler, et. al. and Wisdom, et. al. conclude that hiking and horseback riding activity disturb elk at distances of 250 meters, mountain biking activity at 500 meters, and ATV riding at 1 kilometer. The amount of disturbance is dependent on the type of activity and amount of use. Route density is only 1 of many considerations in managing wildlife disturbances from human activity.

A particular example is the Almont Triangle Corridor. In a previous comment to GMUG, Colorado Parks and Wildlife (CPW) made its Management Recommendation for the Almont Triangle Corridor:

[ldquo]The Almont Triangle and surrounding areas to the North, East, and South, not only provide deer, elk, and bighorn sheep habitat throughout the year, it provides one of the most critical wildlife migration corridors for deer, elk, and bighorn sheep in the Gunnison Basin. Adjacent developments and highway traffic is constricting the movements of these ungulates. This area serves as a documented pinchpoint for ungulates movements to critical winter ranges to the south.

[ldquo]Future increases in recreational and other off-highway traffic in the Almont area threaten the longterm viability of large populations of elk and deer, an important bighorn sheep population, and the federally listed Gunnison sage-grouse.

[ldquo]Due to the significance of this area, CPW recommends no additional routes of any kind be constructed, and that access be limited to existing routes.[rdquo]

CPW[rsquo]s management recommendation is not based on a simple one-size-fits-all route-density formula. It[rsquo]s based on years of data and science. CPW is continuing to advance both data and science with its current field research into the effects of human activity on elk herds.

GMUG[rsquo]s land management for wildlife habitat should consider multiple objectives on a case-by-case basis using available science coupled with field data. As Wisdom suggests, [ldquo]Forest managers can use [his group[rsquo]s] results to help optimize trade-offs between competing objectives for trail-based recreation and wildlife species like elk that are sensitive to human activities on public forests.[rdquo]

Please replace the draft route-density formula management approach with a multi-disciplinary scientific, fact-based approach.