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First name: Nic

Last name: Korte

Organization:

Title:

Comments: My principal comment is that the working draft emphasizes "business as usual" without explicit recognition of the unprecedented rapid changes occurring with respect to climate and species loss. The plan emphasizes "public enjoyment" and "commodity use and community connections." Yet, the sustainability of ecological and wildlife resources has equal weight in the planning rules. Indeed, the forests are necessary to be "source" habitat for many declining species-even if they remain common on these particular forests. Refer, for example, to the list of "common birds in steep decline." Just because a bird remains common on the forest, does not mean special management isn't required to ensure that it remains so.

If the USFS is truly serious about using "adaptive management" in a rigorous approach going forward, this document needs to highlight specific issues that are expected to emerge: climate issues wrt wildlife (eg Boreal Owl habitat), overuse (too many 4-wheelers/ORV users). As an example, I saw "trains" of ORV users exceeding 10 vehicles in the Mule Park area previously this summer. Many studies show the noise affects wildlife at a great distance from the trails. Permits and limits may be needed.

Also, wrt to species of concern, such as birds, the draft documents only mention consulting with the Bird Conservancy of the Rockies, but there are many other sources which may be of equal or greater help: Partners-in-Flight, Colorado Field Ornithologists (eg. Colorado Breeding Bird Atlas). Because of the length of time the final plan will be in force, addressing issues such as "common birds in steep decline," (an example is Wilson's Warbler) is imperative. [The attached graph shows that a great many GMUG avian species are undergoing significant declines in their overall range]