

Data Submitted (UTC 11): 11/8/2021 5:40:39 PM

First name: Casey

Last name: Pelzl

Organization:

Title:

Comments: I am a local sportsperson who hunts and fishes on the GMUG and surrounding public lands. I am also a member of the Colorado Chapter of Backcountry Hunters & Anglers (BHA) and/or Theodore Roosevelt Conservation Partnership (TRCP).

The GMUG is a premier destination for hunters and anglers from all over the Nation. Hunting and fishing are a vital part of our local economy. For the rural counties within the GMUG planning area, the economic benefits of hunting and fishing activities are estimated to be over \$114 million annually and support over 1,900 jobs.

The GMUG planning area accounts for nearly a fifth of all mule deer and elk populations in the entire State of Colorado, and over 5,000 miles of perennial and intermittent waterways that support biologically, economically, and recreationally important native and sport fisheries. As hunters and anglers we are concerned about the long-term capability of terrestrial and aquatic habitats on the GMUG to sustain our mule deer, elk, and bighorn sheep herds, as well as our native and sportfish populations.

Things that We Support in the Draft Forest Plan:

1) The designation of Wildlife Management Areas with focused management. CO BHA and TRCP strongly 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.

Plan components proposed by the USFS that we support to provide the special management needed for WMAs and to enhance big game populations forest wide include:

- 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. CO BHA and TRCP 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 (see below).
- 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)

Areas for Improvement in the Draft 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 - We are 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 - We are 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. Big game and other wildlife rely on functional, interconnect roadless habitats as they migrate across the landscape between seasonal ranges or migrate upstream. CO BHA and TRCP 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. Not doing so now will only preclude the opportunity for us and the next generation.