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Comments: I have been reviewing the proposed GMUG Forest Plan Revision and appreciate the opportunity to provide comments to the planning process. I am a local sportsman who hunts, fishes and recreates on Colorado's public lands and spend a great deal of time on the GMUG. I am also a member of the Colorado Chapter of Backcountry Hunters & Department of

This is extremely concerning for the management and stability of our big game populations as more and more studies are confirming that big game "need" large tracts of land with minimal or no trails or roads that intersect them. I have confirmed this myself in parts of the Maroon Bells where there use to be lots of elk but with the substantial increase in recreation in the area, the elk have all but disappeared in some remote areas due to the limited space between trails.

The following are areas of the proposed plan that I support and feel are extremely important that they be included in the final plan:

The designation of Wildlife Management Areas with focused management. I 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 spatial 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 I 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. 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.

*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 that I believe should be improved in the Draft Forest Plan include:

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 generations to maintain their roadless character in the future.
- 5. Wilderness Areas the plan recommends only 34,000 acres (just over 1% of the GMUG) for wilderness designation. This needs to be reviewed more closely as there are over a million acres of roadless land within the GMUG and areas like Kelso Mesa, which is one of the largest roadless areas on the Uncompahgre Plateau, should be recommended for Wilderness designation since it possesses high degrees of wilderness characteristics. Also, it needs to be very clear that any area that has Wilderness Designation does not allow for any mechanized means of travel within the area.
- 6. Timber Sales the plan recommends more timber operations than I would ever like to see. However, if timber operations are going to be recommended, I would like to see stronger standards and guidelines to ensure commercial timber sales within WMAs would retain or enhance forage production and availability within seasonal concentration areas, production areas, and security areas. Standards should also be very clearly define how timber extraction can be completed by utilizing existing roads where no new roads can be established and that any timber operations will be conducted to minimize other recreation activities, such as hiking, biking, fishing, etc. I have seen the impacts of timber operations in other states and even 20 years later the scars and roads on the landscape are still present and there is significant evidence of unauthorized motorized use along the old, closed logging roads.

In closing, the USFS has an opportunity to set a standard with this plan. There is becoming less and less "wild" places left in the lower 48 states and Colorado is one of the most known "wild" areas. I constantly run into other

hunters and hikers from other states and countries (and many times I meet more out-of-state hunters than instate hunters.) If we don't put serious protections for these lands now, we will lose this precious resource forever. We need to protect this area for my kids and their kids.

Thank you.