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Organization: Colorado Wildlife Federation
Title:
Comments: Colorado Wildlife Federation comments re GMUG working draft

Thank you for the opportunity to provide comments at this working draft

stage. We appreciate this additional step in your process. Our comment

letter is attached.

Suzanne O'Neill

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Dear Plan Revision Team:

Working Draft of the Grand Mesa, Uncompahgre and Gunnison (GMUG) Forest Plan

Colorado Wildlife Federation (CWF) is pleased to take this preliminary opportunity to provide comments to this working draft. We appreciate this additional step in your planning process.

Safeguarding wildlife movement connectivity is essential, whether a migration corridor or movement routes. CWF appreciates Wildlife Management Area Direction (MA3.2) and Desired Condition MA-DC-WLDF-01). We urge that you develop a Standard that addresses and emphasizes the importance of protecting big game migration corridors/routes across the landscape, as it is a focus of vital cross-jurisdictional attention among agencies and stakeholders. Colorado Parks and Wildlife regions are in the process of set their priorities for corridors to protect and Grand Mesa and routes into the Gunnison basin are among those priorities. In addition, elevating the Guidelines for protecting big game in reproduction areas and winter range (FW-GDL-SPEC-17) to the mandatory

level of Standards would be helpful. We must presume that climate change will become an important ecological conditions/adaptation factor during the 15-year period of the Plan as to migration routes, winter range, etc. Related Guideline FW-GDl-SPEC-06 provides constructed features should be removed when no longer needed. In our view, this provision, too, should become a Standard rather than a guideline. In the context of leasable minerals and energy resources, a Standard should be added under ENMI to safeguard critical winter ranges similar to provisions in the Colorado Oil and gas Conservation Commission rules and migration corridors.

We also commend you for developing draft Standard, FW-STND-SPEC-15 and 16 to maintain effective separation between bighorn sheep and domestic sheep on active grazing allotments.

As to the Recreation (REC) section, under DC-REC-02, we request that a sentence be added to emphasize the need to balance outdoor recreation and wildlife conservation on GMUG lands. In determining unacceptable ecological impacts and sustainable use levels, FW-STND-REC-06 and 07, we urge consideration be added for sensitive wildlife habitats and movement routes/corridors. We appreciate the "no net gain" language in MA-STND-WLDF-02. The need to balance wildlife conservation and recreational trail development on public lands increasingly has been recognized throughout the state as requiring attention. By way of example, the State Trails Committee has updated their non-motorized trails planning criteria to strengthen the cumulative impact and wildlife criteria.

In the Riparian Management Zones section, we see a reference to setbacks of 100 feet for perennial and intermittent streams, wetlands, lakes and reservoirs. We have participated in planning on BLM lands in various areas and draft setbacks have focused on particular water bodies, rather than establishing a uniform setback. (South Park serves as an example.)

In the Timber Suitability (TMBR) section, approximately 971,000 acres have been identified as suitable for timber production. We urge that migration routes and sensitive wildlife habitats be excluded.

Thank you for this opportunity. We shall make formal detailed comment on the draft upon its issuance.

Sincerely,

Suzanne O'Neill