Forest Planning Team

GMUG National Forest

2250 Highway 50

Delta, CO 81416

January 22, 2018

Dear GMUG Planning Team,

Please accept these comments on the draft wilderness inventory from Sheep Mountain Alliance. SMA would like to thank you for contacting us before you released the draft inventory, and taking the time to answer our questions about it. Sheep Mountain Alliance has also submitted group comments in collaboration with The Wilderness Society, High Country Conservation Advocates, and numerous other groups. We would like to reemphasize some of the main points stated in that document including:

* Broad application of exclusions based on mining and timber layers urgently needs to be refined and reduced. Solutions include ground-truthing areas to determine which of these features are truly “substantially noticeable,” and applying filters so that only certain types of mining impacts (such as actively operating or actively being remediated) and certain types of timber impacts are excluded (such as clearcuts in the last two decades).

We also want to emphasize the importance of prioritizing wilderness designation throughout all of the areas that are part of the proposed San Juan Mountains Wilderness Bill. An extensive and collaborative multi-stakeholder process has taken place over the last ten years to carefully vet the boundaries of this Wilderness Bill, which will likely be reintroduced within the next month. In its current form, it has already made it through the Senate Committee and it is broadly supported by all the county commissioners in all 3 counties that it touches, as well as multiple municipal governments and hundreds of local businesses and individuals. Since 2013 when it was last introduced, it has gone through minor refinements, and as discussed with Sam Staley, we are trying to get the most current boundary shapefiles to you as soon as possible.

We believe that the San Juan Mountains Wilderness Act areas should be considered part of the baseline for wilderness designation, and thus should be designated wilderness in all of the alternatives considered in subsequent rounds of this process. If possible, in the next step of the inventory and evaluation process, we would like to see San Juan Mountains Wilderness Areas specifically mentioned.

Within the boundaries of the area already proposed as part of the San Juan Mountains Wilderness Act there are a number of areas that have been pockmarked with exclusion buffers around features such as mine holes or mine dumps. Other areas of concern that conflict with some of the boundaries of the proposed San Juan Mountains Wilderness are private land and mine holdings shown as exclusions on the inventory map, and the large 300 foot buffer around all roads.

Lexi Tuddenham

Executive Director

Sheep Mountain Alliance