



BOARD OF COMMISSIONERS

KRIS HOLSTROM HILARY COOPER JOAN MAY

October 9, 2018

Mr. Scott Armentrout, Forest Supervisor
Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG)
2250 South Main Street
Delta, CO 81416

Via Online GMUG Wilderness Comment Tool:

<https://cara.ecosystemmanagement.org/PublicCommentInput?project=NP-1810>

RE: San Miguel County, Colorado, comments on: *GMUG National Forest DRAFT Wilderness Evaluation Report August 2018*

Dear Mr. Armentrout and GMUG Planning Team,

San Miguel County appreciates the opportunity for public comment on the GMUG planning process and the draft document, "*Grand Mesa, Uncompahgre, and Gunnison National Forests DRAFT Wilderness Evaluation Report August 2018*,"¹ (hereafter, *draft Wilderness Evaluation Report*).

We also appreciate the GMUG's offer to receive input on areas we have personal experience with. We understand from the GMUG planning team that if photos are provided, they should ideally be georeferenced. We may submit additional comments and documentation of some of the evaluation polygons if conditions permit personal field visits this fall.

It is our understanding that the evaluation phase of the GMUG wilderness planning process aims to examine and evaluate the wilderness characteristics of lands included within the wilderness inventory using the required wilderness criteria², following the requirements of 2012 Forest Service Planning Rule³ and Forest Service Handbook 1909.12, Chapter 70⁴, and using criteria included in the Wilderness Act of 1964 section 2(c), to determine potential suitability for inclusion in the National Wilderness Preservation System (NWPS). The GMUG draft evaluation groups inventoried lands into polygons and rates the polygons as having degrees of "low," "moderate," "high," or "no" wilderness characteristics.

This evaluation precedes the wilderness analysis and recommendation step of the wilderness planning process. The evaluation will form the basis of the analysis phase in which the forest

¹ "*Grand Mesa, Uncompahgre, and Gunnison National Forests DRAFT Wilderness Evaluation Report August 2018*," (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd590235.pdf)

² Evaluation criteria is discussed in "*REVISED: Evaluation of Wilderness Characteristics for Lands that may be Suitable for Inclusion in the National Wilderness Preservation System*," August 2018; (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd589056.pdf)

³ <https://www.fs.usda.gov/detail/planningrule/home/?cid=stelprd3828310>

⁴ https://www.fs.fed.us/im/directives/fsh/1909.12/wo_1909.12_70_Wilderness.docx

supervisor will determine which polygons to further analyze with a National Environmental Policy Act (NEPA) process. Following the analysis, the forest supervisor will decide which polygons, if any, to recommend for inclusion in the NWPS. Lands evaluated and analyzed through this process and the resulting NEPA analysis are only preliminary administrative recommendations. Congress has reserved the authority to make final decisions on wilderness designation.⁵

The GMUG planning team has indicated via webinar and website materials⁶ that comments which answer the following questions are helpful and desired:

- *Are the narratives clear and do they reflect the considerations outlined in the criteria?*⁷
- *Does each narrative reflect your understanding and knowledge of a particular area?*⁸
- *Are there opportunities for solitude or primitive and unconfined recreation?*⁹

The evaluation criteria¹⁰ for each of the five wilderness characteristics is summarized in Table 1 of the GMUG's *"REVISED: Evaluation of Wilderness Characteristics for Lands that may be Suitable for Inclusion in the National Wilderness Preservation System,"* dated August, 2018, (hereafter, *revised Evaluation Criteria document*).

The five wilderness characteristics are: 1. Apparent naturalness. 2. Outstanding opportunities for solitude or primitive/unconfined type of recreation. 3. Sufficient size to make its preservation and use in an unimpaired condition practicable. 4. Ecological, geological, or other features of scientific, educational, scenic, or historical value. 5. Degree to which the area may be managed to preserve its wilderness characteristics.

In addition to attending the GMUG's webinars, multi-county meetings, reviewing online planning documents and the interactive Story Map, we are relying on information obtained during a phone call and follow-up emails between our Government Affairs & Natural Resources Director, Lynn Padgett and GMUG Planning and Information Staff Officer, Shane Walker.¹¹ In these communications, GMUG staff indicated that **1** (Apparent naturalness) and **2** (Outstanding opportunities for solitude or primitive/unconfined type of recreation) were weighted more heavily than factors **3**, **4**, and **5**. GMUG staff also indicated that with respect to factor **2**, an area was considered for solitude **OR** high-quality opportunities for semi-primitive recreation.

Our comments are "General" and then "Specific" to the polygon ID number assigned in the GMUG evaluation materials. We are limiting our comments to lands within San Miguel County and/or

⁵ The steps or phases of the Wilderness planning process are described in several GMUG documents including: *"REVISED: Evaluation of Wilderness Characteristics for Lands that may be Suitable for Inclusion in the National Wilderness Preservation System,"* August 2018, (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd589056.pdf); "The Wilderness Process" guide, 2018, (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd589155.pdf), and *"Grand Mesa, Uncompahgre, and Gunnison National Forests DRAFT Wilderness Evaluation Report August 2018,"* (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd590235.pdf).

⁶ <https://www.fs.usda.gov/main/gmug/landmanagement/planning>

⁷ <https://www.fs.usda.gov/main/gmug/landmanagement/planning>

⁸ <https://www.fs.usda.gov/main/gmug/landmanagement/planning>

⁹ "The Wilderness Process" guide, 2018, (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd589155.pdf)

¹⁰ Evaluation criteria is discussed in *"REVISED: Evaluation of Wilderness Characteristics for Lands that may be Suitable for Inclusion in the National Wilderness Preservation System,"* August 2018; (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd589056.pdf)

¹¹ Phone call, September 4, 2018; and emails September 5 and 6, 2018.

intersecting the areas encompassed in the San Juan Mountains Wilderness Act (S. 2721)¹². San Miguel County Commissioners have been actively involved in the lengthy collaborative process that led to the San Juan Mountains Wilderness Act.

GENERAL COMMENTS

1. All lands included within the boundaries of a Wilderness Addition, Special Management Area (SMA) or Mineral Withdrawal included in the 2018 San Juan Mountains Wilderness Act¹³ (SJMWA) should be included in all phases (inventory, evaluation, analysis and recommendation). The San Juan Mountains Wilderness Act boundaries have been carefully and thoughtfully determined through a decade-long collaborative vetting process which included multiple meetings with GMUG and Region 2 staff. The lands within the current boundaries of all the designations were determined to have a high degree of wilderness characteristics. The specific designations, including the Special Management Areas and Mineral Withdraw, were designed to protect those wilderness characteristics while eliminating conflicts and accommodate existing uses and rights. Bill language for the Special Management Areas were drafted to ensure the protection of wilderness characteristics while allowing non-Wilderness activities and access to continue.
2. The lands within the boundaries of the SJMWA should be included in one or more of the alternatives during the analysis and recommendation phases. The boundaries were drawn to ensure preservation of high degrees of naturalness, solitude or unconfined recreation, appropriate size or adjacency to existing Wilderness and include unique, special, and/or iconic characteristics while also having a high degree of manageability and regional support. The Bill has broad regional support from multiple user groups, past and present members of the Colorado delegation and bi-partisan support from the House Natural Resources Committee and recently support from the USFS in the Senate Energy and Natural Resources Committee Hearing. Unfortunately the draft Wilderness Evaluation lumped inventoried lands with somewhat dissimilar degrees of wilderness characteristics into polygons with SJMWA lands (such as N5 and N6) which caused evaluation polygons to be down-rated. The analysis and recommendation phases should recognize that the lands with the highest degrees of wilderness characteristics have been thoughtfully and intentionally included in the Wilderness and SMA designations of the SJWMA.
3. We appreciate that lands within some of the “doughnut holes” included in the first draft inventory are now included within the evaluation. Inclusion of these lands appears to be in accordance with the Forest Service Handbook (FSH) 1909.12, Chapter 71.22b. The lands in the doughnut holes may or may not actually be buffers around possible mining relics and do not detract from the apparent naturalness as a whole. The FSH directs the inventory to include lands where evidence of past human activities such as vegetation treatments, timber harvest areas, mining activity are not substantially noticeable in the area as a whole.
4. The draft Evaluation Criteria document and process of determining evaluation ratings needs to be clear, consistent, methodical, and repeatable. Table 1 of the document organizes the five wilderness characteristics being evaluated framed as questions and bulleted considerations. Having spent considerable time trying to relate the evaluation ratings given to certain polygons with the material in Table 1 on pages 4-9 and the “general

¹² <https://www.congress.gov/bill/115th-congress/senate-bill/2721>

¹³ <https://www.congress.gov/bill/115th-congress/senate-bill/2721>

characterizations” of what is supposed to be reflected by ratings of “High,” “Moderate,” and “Low” on pages 2-3, we feel that this guidance material and the process did not ensure “consistent, methodical assessment of the Evaluation polygons across the GMUG’s three Forests and five Ranger Districts.”¹⁴

- a. We suggest that additional columns be added to Table 1 that clearly communicate the ratings for each of the five characteristics, so it is obvious what the nuances are between High, Moderate, Low, and No wilderness. This would be helpful to ensure a clear, consistent, methodical, and repeatable system to determine evaluation ratings. For our own review process, our staff created a table from the narrative on pages 2-3 of the draft Evaluation Criteria document. (Included at the end of this comment letter.)
- b. The draft Evaluation Criteria document can also be improved by specifically defining the terms, “primitive,” “semi-primitive,” “high-quality” and “quality,” with respect to types of unconfined recreation and the quality of unconfined recreation opportunities.
 - i. The Forest Service Handbook 1909.12, Chapter 70, provides examples of primitive-type recreation activities as “observing wildlife, hiking, backpacking, horseback riding, fishing, hunting, floating, kayaking, cross-country skiing, camping, and enjoying nature.”¹⁵
 - ii. Table 1 of the draft Evaluation Criteria document provides evaluation considerations of the Recreation Opportunity Spectrum within the polygon with respect to determining the degree of solitude and a consideration of the Primitive or Semi-Primitive Non-Motorized Recreation Opportunity Spectrum (ROS) classes for determining the degree of outstanding opportunities for primitive and unconfined recreation and the visitor’s ability to feel to be a part of nature.
 - iii. The online and printable versions of the Recreational Opportunity Spectrum Field Guide were helpful to understand the thresholds used to describe primitive vs. semi-primitive non-motorized and semi-primitive motorized with respect to experiences of solitude, challenges and self-reliance.¹⁶
5. The lumping of inventoried lands into larger evaluation polygons makes sense where lands are similar. In the cases where there is an existing right such as a ditch, mechanized trail, or potentially conflicting management, adjacent lands could be separated into different polygons rather than downgrade the larger area as a whole. It appears that the polygons also lump lands identified as primitive with other non-primitive or semi-primitive

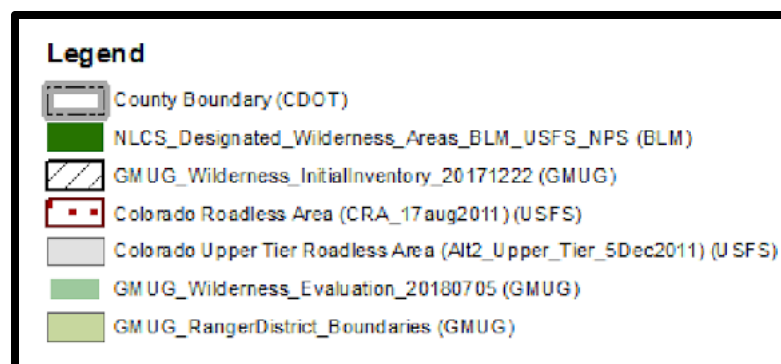
¹⁴ The top of page 2 of the Evaluation criteria is discussed in “*REVISED: Evaluation of Wilderness Characteristics for Lands that may be Suitable for Inclusion in the National Wilderness Preservation System*,” August 2018; (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd589056.pdf) states, “This guidance material helps ensure consistent, methodical, assessment of the Evaluation polygons across the GMUG’s three Forests and five Ranger Districts.”

¹⁵ https://www.fs.fed.us/im/directives/fsh/1909.12/wo_1909.12_70_Wilderness.docx

¹⁶ https://www.fs.fed.us/cdt/carrying_capacity/rosfieldguide/ros_primer_and_field_guide.htm and https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5335339.pdf

Recreation Opportunity Spectrum (ROS), which also serves to downgrade the polygon as a whole. We understand that the wilderness parcels have a minimum size criterion of 5,000 acres. However, where there are lands adjacent to designated Wilderness, the acreage requirement should include the existing Wilderness acreage, which would allow for lands with similar degrees of wilderness characteristics to be fairly considered.

6. Lands that were identified in the 2007 GMUG plan revision process as “proposed recommended wilderness”, “backcountry” or “primitive lands” should be recognized as suitable for a “high” evaluation rating if there have been no significant changes with respect to the five wilderness characteristics being evaluated.
7. All lands that were designated as a Colorado Roadless Area should be included in the inventory and evaluation, or sufficient documentation of the rationale for their omission must be provided. Colorado Roadless Area characteristics¹⁷ are generally aligned with the guidelines of lands to include in the wilderness inventory described in Forest Service Handbook 1909.12, Chapter 71.¹⁸ GMUG has not provided an adequate description of why these lands were omitted, especially when the majority of the same Colorado Roadless Area was included within the GMUG wilderness inventory. These may be simple oversights or accidental computer mapping omissions due to georeferencing or source layer differences. We are flagging the ones we noticed within San Miguel County and/or the lands intersecting the San Juan Mountains Wilderness Act. These lands should be added into the inventory and evaluation. Below is a legend for the maps following, to help describe the location and nature of the omissions including:
 - The margins of the Wilson CRA and Upper Tier CRA omitted from GMUG evaluation polygons N6 and N5 (inventory polygons 26, 29, and 34). See Figure 1 below.
 - The margins of the Last Dollar/Sheep Creek CRA omitted from GMUG evaluation polygon N2 (inventory polygon 45). See Figure 2 below.
 - The margins of the Hope Lake CRA were omitted from GMUG evaluation polygon N4 (inventory polygon 44). See Figure 3 below.



Legend for Figures 1-4.

¹⁷ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5365696.pdf

¹⁸ Section 71 of https://www.fs.fed.us/im/directives/fsh/1909.12/wo_1909.12_70_Wilderness.docx

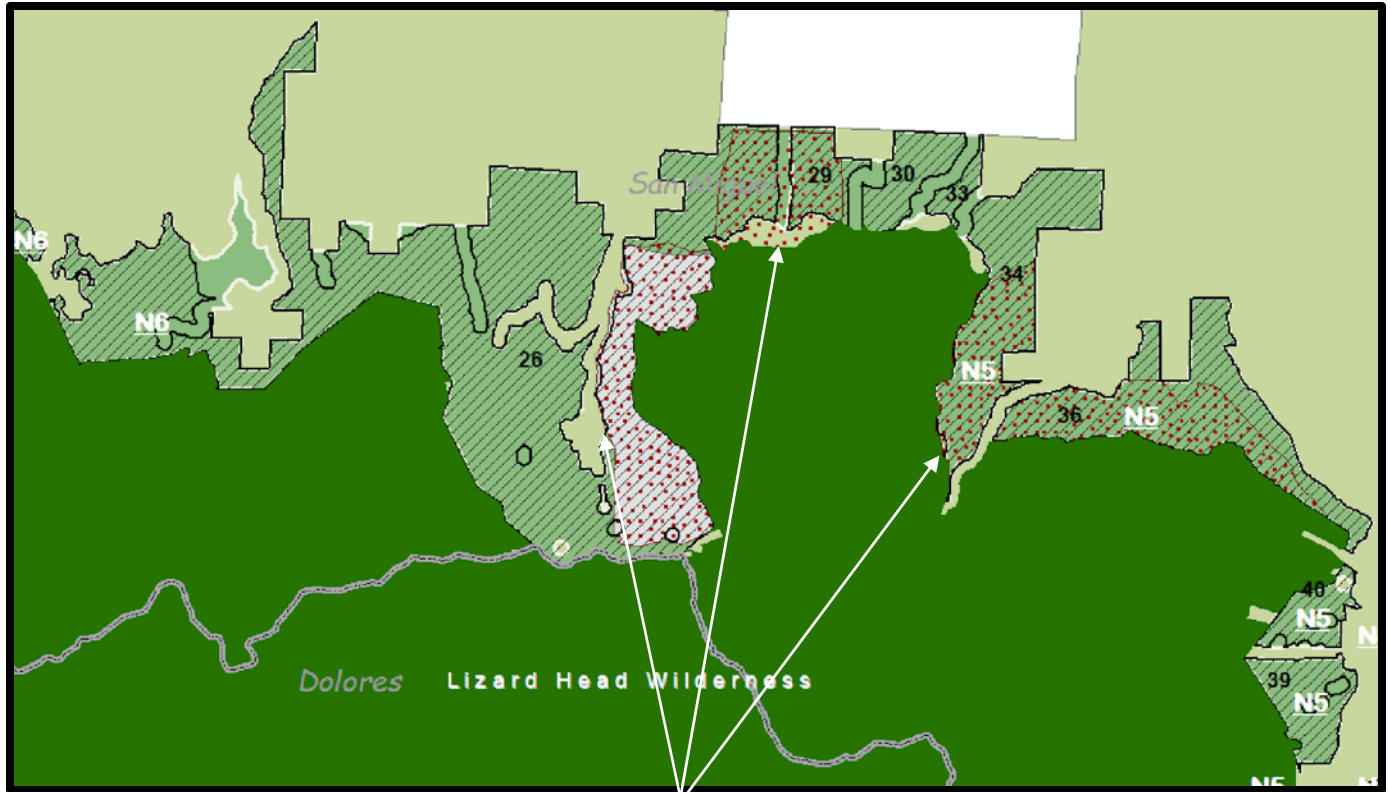


Figure 1: Arrows are pointing to the Wilson Upper Tier Colorado Roadless Area (CRA) and Wilson CRA lands that are not fully included in GMUG wilderness inventory polygons 26, 29 or the wilderness evaluation polygon N6. Similarly, an arrow is pointing to the margins of the Wilson CRA that were not included in inventory polygon 34 and evaluation polygon N5. Any area where the black striped hatching and/or light green is not fully overlapping a tan or red stippled area, is where a CRA exists that has not been included in the GMUG wilderness inventory or evaluation. Dark green area is designated Wilderness. The evaluation included lands not in the draft inventory GIS layer (December 22, 2017), but it appears that the evaluation is still omitting qualified lands without providing explanation.

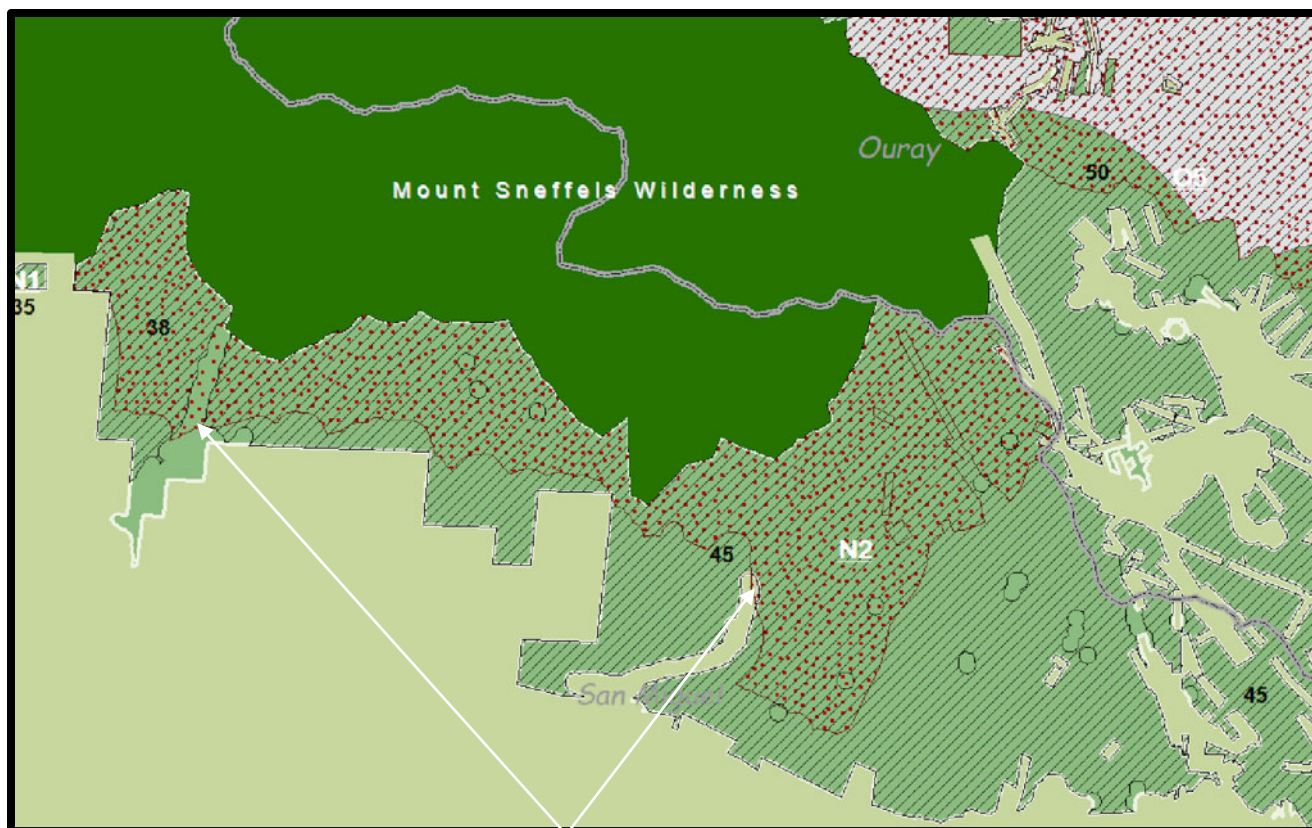


Figure 2: The arrows are pointing to the Last Dollar/Sheep Creek CRA lands that are not fully included in GMUG wilderness inventory polygon 45, or wilderness evaluation polygon N2.

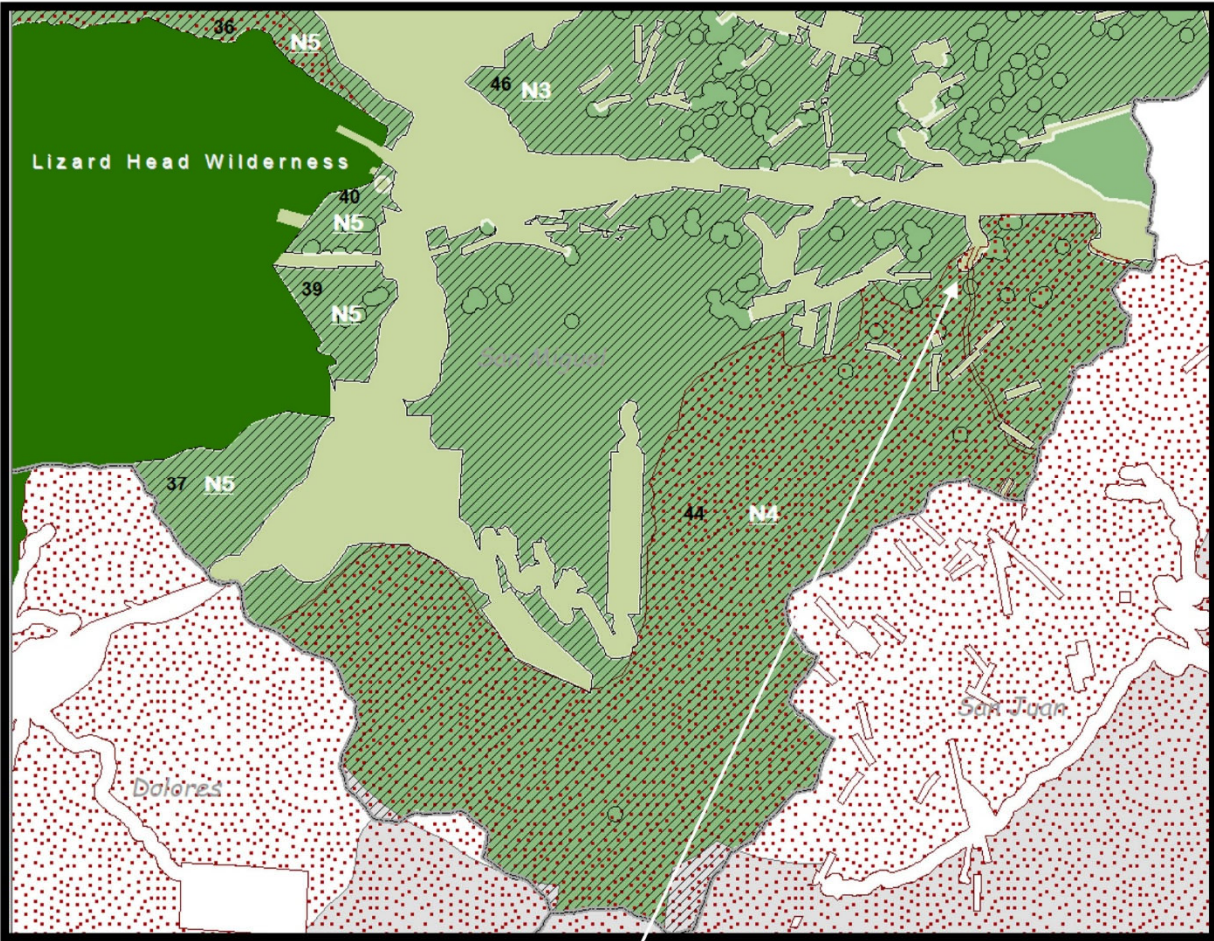


Figure 3: The arrow is pointing to the Hope Lake CRA lands that are not fully included in GMUG wilderness inventory polygon 44, or wilderness evaluation polygon N4. (The red stippled white or gray areas south of N4 are CRA areas south of the GMUG National Forests Boundary.)

8. USFS lands located between designated Wilderness and lands included in the wilderness evaluation should be included in the inventory and evaluation. There are some orphan areas that lie between existing Wilderness and inventory/evaluation polygons that have been omitted from this planning process without explanation. These include lands between the northern limit of the Lizard Head Wilderness and inventory polygons 26, 29, 30, 33, 34, and 40 (evaluation polygons N6 and N5). See Figure 4 below.

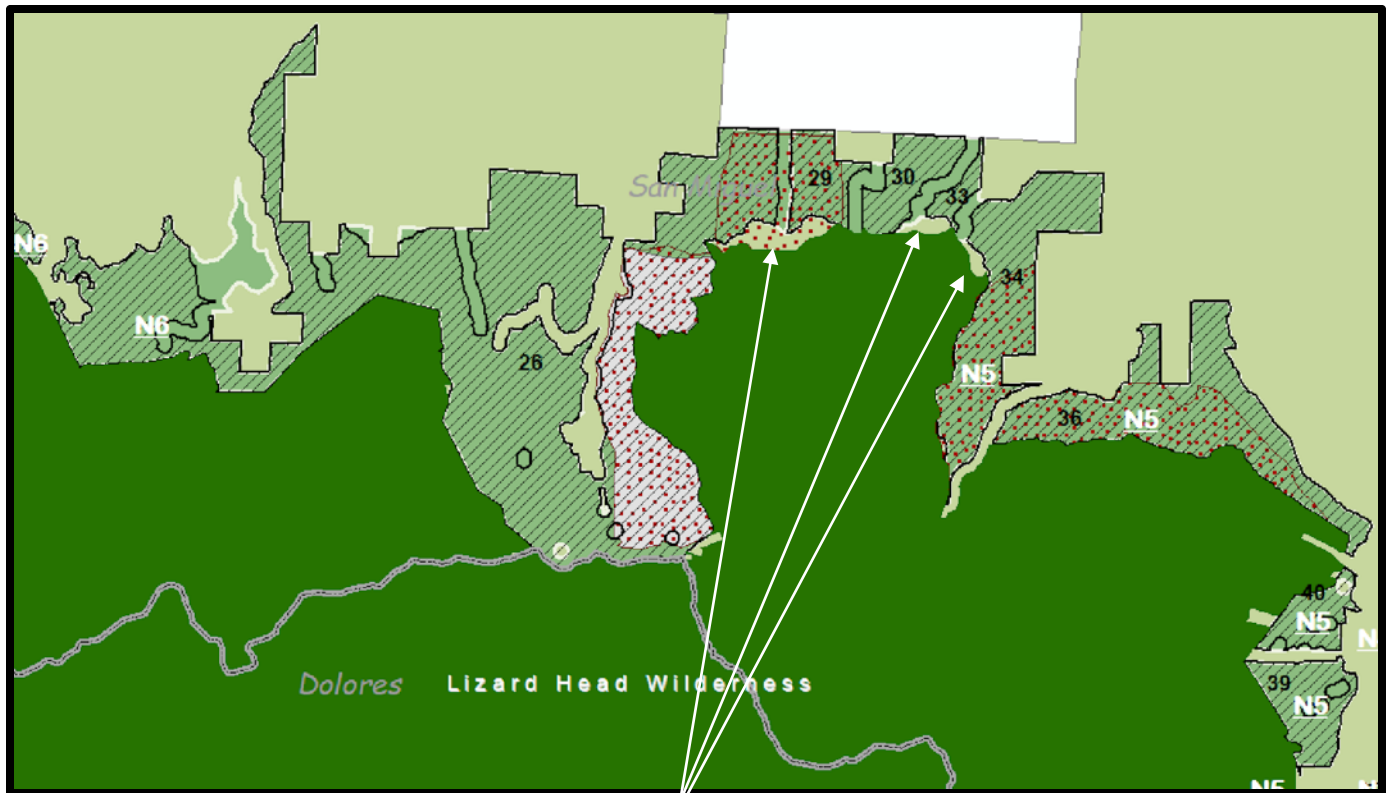


Figure 4: Arrows are pointing to lands between the northern limit of the Lizard Head Wilderness and inventory polygons 29, 30, 33, and 34 (evaluation polygon N5). Light green areas are included in the draft evaluation. Dark green is designated Wilderness.

9. All lands that were included in the wilderness inventory should be evaluated and assigned a rating of “No”, “Low”, “Moderate” or “High” wilderness characteristics.
 - a. Lands in inventory polygon 46 were not included in the nearest evaluation polygon N3. These lands should be given an evaluation rating, even if it is “No” wilderness characteristics like the lands evaluated as polygon N3. See Figure 5 below.



Legend for Figure 5 below.

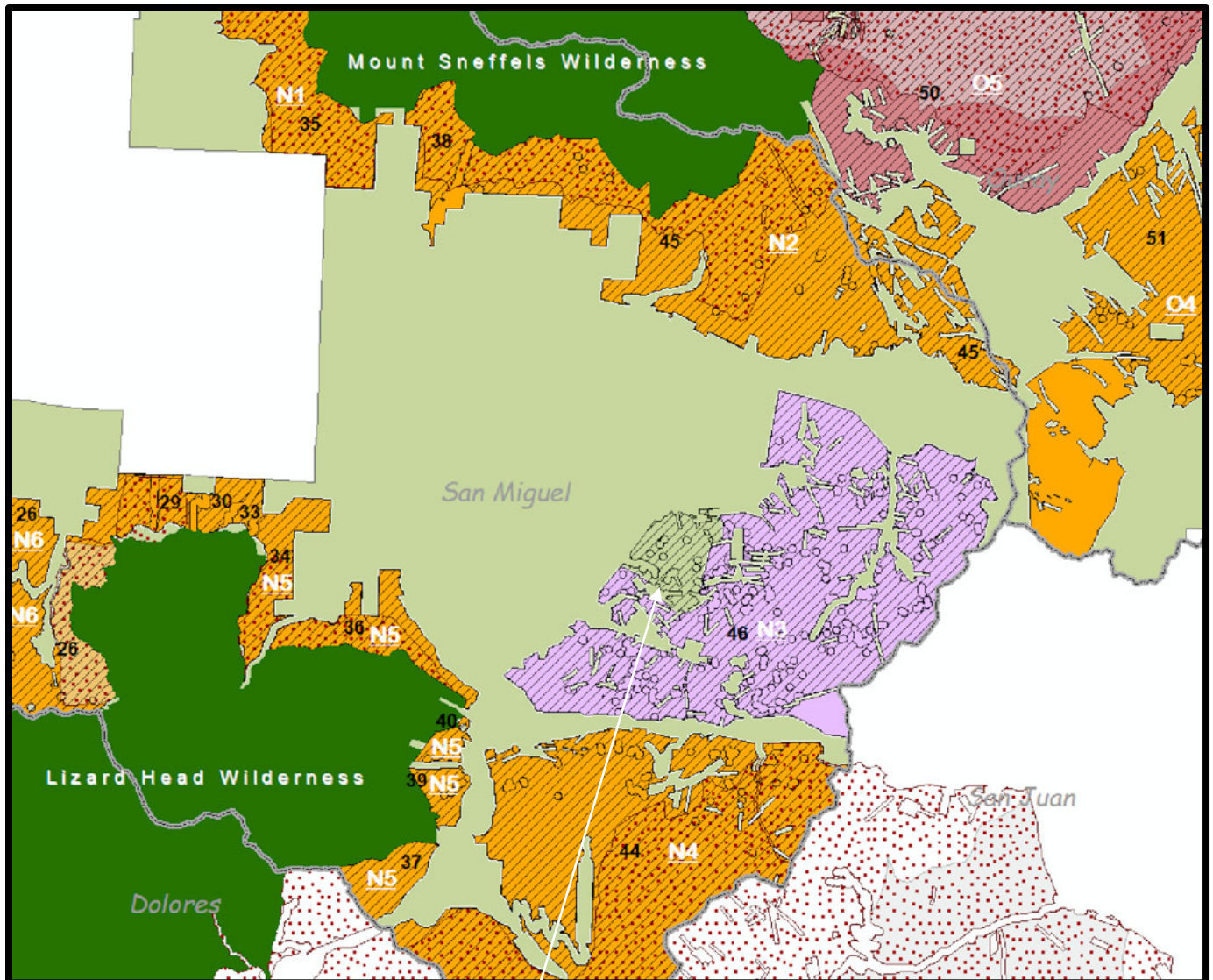


Figure 5: An arrow is pointing to lands (striped black hatching) included in the inventory polygon 46, but not included in evaluation polygon N3. The wilderness characteristic ratings given to the evaluation polygons are shown as pink (“no”), orange (“moderate”), and red (“high”). Refer to the Figure 5 legend above.

10. Discrepancies listed below were found between GMUG trail descriptions, Uncompaghere National Forest Mountain Division Map and USFS provided “Terra Trail” GIS layer metadata. (We appreciate the GMUG planning team making the Terra Trail GIS layer available.)

- a. Lizard Head Trail #505 is described by GMUG as a wilderness access trail open to hiking and horseback riding.¹⁹ The Terra Trail GIS layer metadata refers to it being open for year-round bicycle access. This appears to be a GIS metadata error.

¹⁹ <https://www.fs.usda.gov/recarea/gmug/recarea/?recid=32430>

- b. Lone Cone Trail #426, where it intersects evaluation polygon N12, is signed by the USFS in the field as being open to hiking and horseback riding. The GMUG trail description also describes it as being open to hiking and horseback riding.²⁰ The Terra Trail GIS layer metadata refers to it being open for year-round bicycle access. This appears to be a GIS metadata error.

SPECIFIC COMMENTS

1. **Evaluation Polygon N1, Last Dollar, 2605 acres.** The draft Wilderness Evaluation Report rated this parcel as “moderate”. It appears the GMUG’s rating was downgraded from “high” based on the presence of non-native species “within the eastern side” of the polygon and near Last Dollar Road, and the perception of “limited opportunities to experience solitude” within all but the eastern portion of the polygon that is adjacent to the Mount Sneffels Wilderness. The report also describes numerous adjacent private properties generating sights and sounds that detract from solitude. It suggests that only “some” of the unconfined recreational opportunities are high quality.

We recommend this Report be changed to reflect that Parcel N1 possesses a “high” degree of wilderness characteristics based on the following information:

Apparent naturalness. The vegetation communities of Englemann spruce, subalpine fir, aspen and alpine tundra-rock outcrop appear natural. No substantially noticeable areas are included in this polygon. Over ninety percent of this polygon is within the Last Dollar/Sheep Creek CRA. Approximately 300 acres in the southernmost portion of the polygon was considered for Upper Tier CRA. The draft Evaluation Report concludes that the limited historic mining relics and past forest management **do not** detract from the apparent naturalness as a whole.

Outstanding opportunities for solitude or primitive/unconfined type of recreation.

Solitude.

The draft Wilderness Evaluation Report suggests that polygon N1 receives “consistent, heavy use due to the proximity to Telluride and the presence of two popular trails.” It also suggests the opportunities to experience solitude are diminished (“limited”) due to sounds from planes using Telluride (TEX) airport and generated from numerous adjacent private properties. This is not an accurate characterization. There is a high degree of solitude present in this polygon. While Last Dollar Road is within 300 feet of the west boundary of the polygon, solitude is achieved by hiking a relatively short distance west of the road. The two trailheads and the well-hidden San Juan Hut are concentrated near Last Dollar Road, accessible only with a high-clearance 4wd vehicle, and all concentrated within 40- to 50-acres (out of 7,605 acres). The San Juan Hut and an agreed upon buffer area were omitted from the SJMWA’s Last Dollar Addition and should not downgrade the degree of wilderness characteristics found on polygon N1. There is a high degree of solitude available from the majority of the polygon.

²⁰ <https://www.fs.usda.gov/recarea/gmug/recarea/?recid=32432>

Trail Use:

- The draft Evaluation Report suggests that both Alder Creek Trail and Whipple Mountain Trail receive heavy use. Together, these total about 3 miles of trail within polygon N1. However, the GMUG website describes the Alder Creek Trail one where visitors can lose the trail. Heavy use would suggest a well-worn trail. “This trail receives only light maintenance so visitors should be prepared to encounter heavy downfall and be skilled in route-finding.”²¹ The GMUG website also describes the Alder Creek Trail use as “light” during the summer and busiest for fall hunting.
- Alder Creek Trail connects to Dallas Creek Trail to the north and only intersects about 2 miles of polygon N1. Regular users of the Dallas Creek and Alder Creek Trails do not report heavy trail usage.
- Similarly, the GMUG webpage for the Whipple Mountain Trail says the usage is “light,” with the busiest season being summer.²² It is not uncommon for hikers to access Whipple Mountain via the Deep Creek Trail. This trail is a scramble near the top where the trail disappears.

Adjacent Properties:

- We found 22 adjacent private properties (parcels that have corners touching polygon N1). Of these, 18 are agricultural, 1 is vacant and 3 are mixed use. These parcels range in acreage from 35 to 2,340 acres, with half being 40-acres or much larger. Only five have addressed structures. It is unlikely that the sights and sounds that might originate from these properties is actively disrupting solitude.

Airport:

- Telluride Regional Airport (TEX) hours of operation are 6am to 9pm. Between January 1, 2016 and January 1, 2017, there was an average of 26 flights per day with less than 1% being commercial flights.²³ Boutique Air started serving TEX with two daily flights in late August 2018. The airport has a noise abatement policy and a curfew from 9pm to 6am daily.²⁴ The minimal amount of airport noise should not be used to give this area a lower rating.
- The Airport’s preferred departure maps show Hastings Mesa and portions of Last Dollar Road proximal to the evaluation polygon N1 as being avoidance areas. TEX also suggests avoiding areas north of the airport (which would lead to N1 and the Mount Sneffels Wilderness (see Figure 6 below). The

²¹ <https://www.fs.usda.gov/recarea/gmug/recarea/?recid=32388>

²² <https://www.fs.usda.gov/recarea/gmug/recarea/?recid=32464>

²³ <https://www.airnav.com/airport/KTEX>

²⁴ <http://tellurideairport.com/wp-content/uploads/TEXnoiseabatement.pdf>

topography of N1 and adjacent areas includes peaks that are physical deterrents including Whipple Mountain, Hawn Mountain, and 14'er Mount Sneffels.

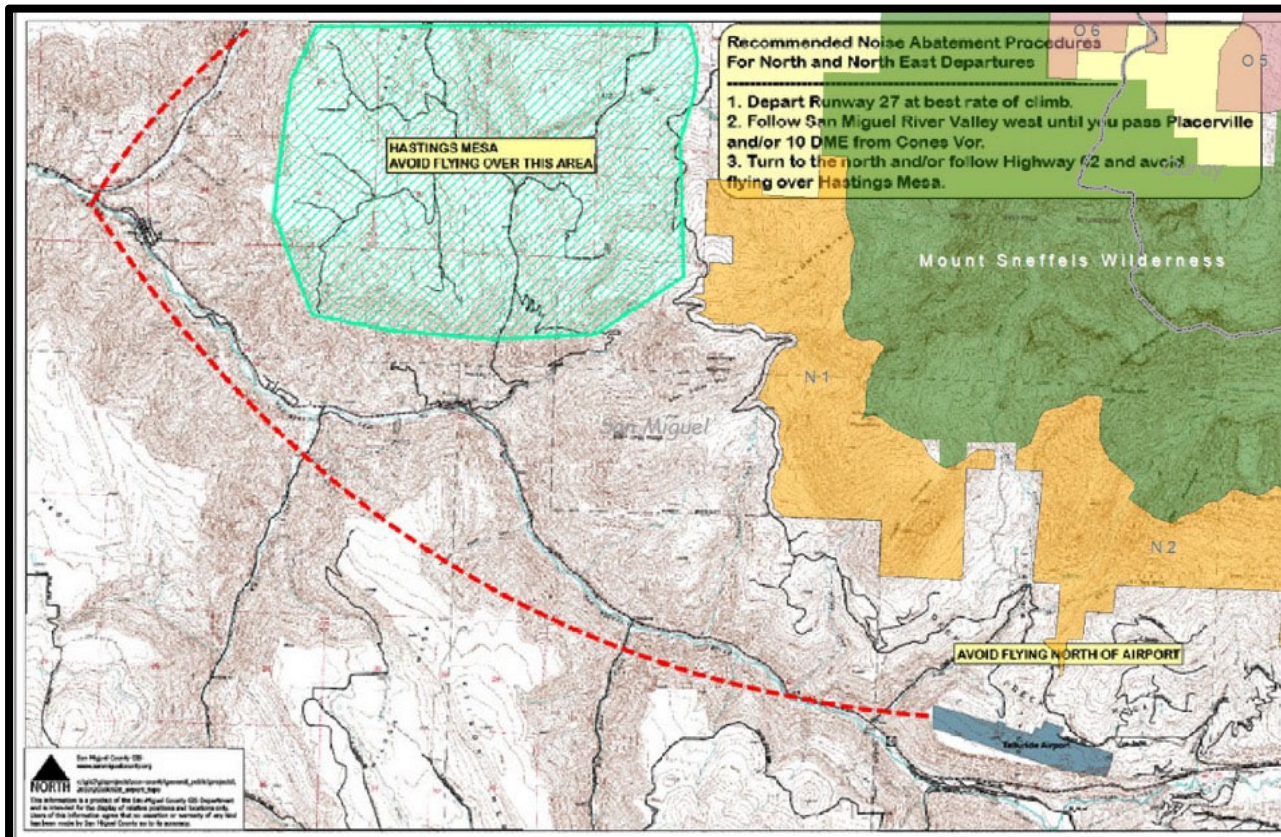


Figure 6. Map available from aviation industry source Whispertrack²⁵, modified to overlay evaluation polygon N1 (Last Dollar) and the Mount Sneffels Wilderness. Red line shows TEX's preferred flight path, which follows Highway 145 and if going northeast, then follows Highway 62.

Unconfined Recreation. There are only 3 miles of trails within the entire polygon. The existing trails are more accurately described as receiving use light enough for the trails to disappear. The trails facilitate access to and through the Mount Sneffels Wilderness. One hiker's description of the Whipple Mountain Trail from the trailhead near Last Dollar Road states, "...hiking up the Whipple Trail to the summit of Whipple Mountain (11,922) which was about 1.5 miles in length with 1,500 feet of elevation gain. It was mostly up an easy trail lined with wildflowers and then the last section from the saddle to the summit was on a faint track through a forest where the mosquitoes were pretty terrible. We enjoyed the view from the summit over toward Wilson Peak, El Diente Peak, and Lizard Head for a little bit and then hiked back down to the trailhead." The hiker's blog dated July 4, 2017, includes spectacular photos of the views of wildflowers and peaks between the San Juan and La Sal ranges.²⁶

²⁵ <https://whispertrack.com/airports/KTEX>

²⁶ <http://adventr.co/2017/07/last-dollar-peaks/>

Summary of “Solitude and Recreation”: Polygon N1 has abundant opportunities for solitude and unconfined primitive recreation. There is no motorized use currently within polygon N1.

Size. Polygon N1 is adjacent to the Mount Sneffels Wilderness and meets this characteristic.

Unique and Outstanding Qualities. This characteristic receives little attention in the draft Evaluation Report. Over forty percent of polygon N1 is mapped by Colorado Parks and Wildlife (CPW) as potential lynx habitat. There is white-tailed ptarmigan habitat around Whipple Mountain. The entire polygon is within elk summer range and over 25 percent of the polygon is elk winter concentration area.

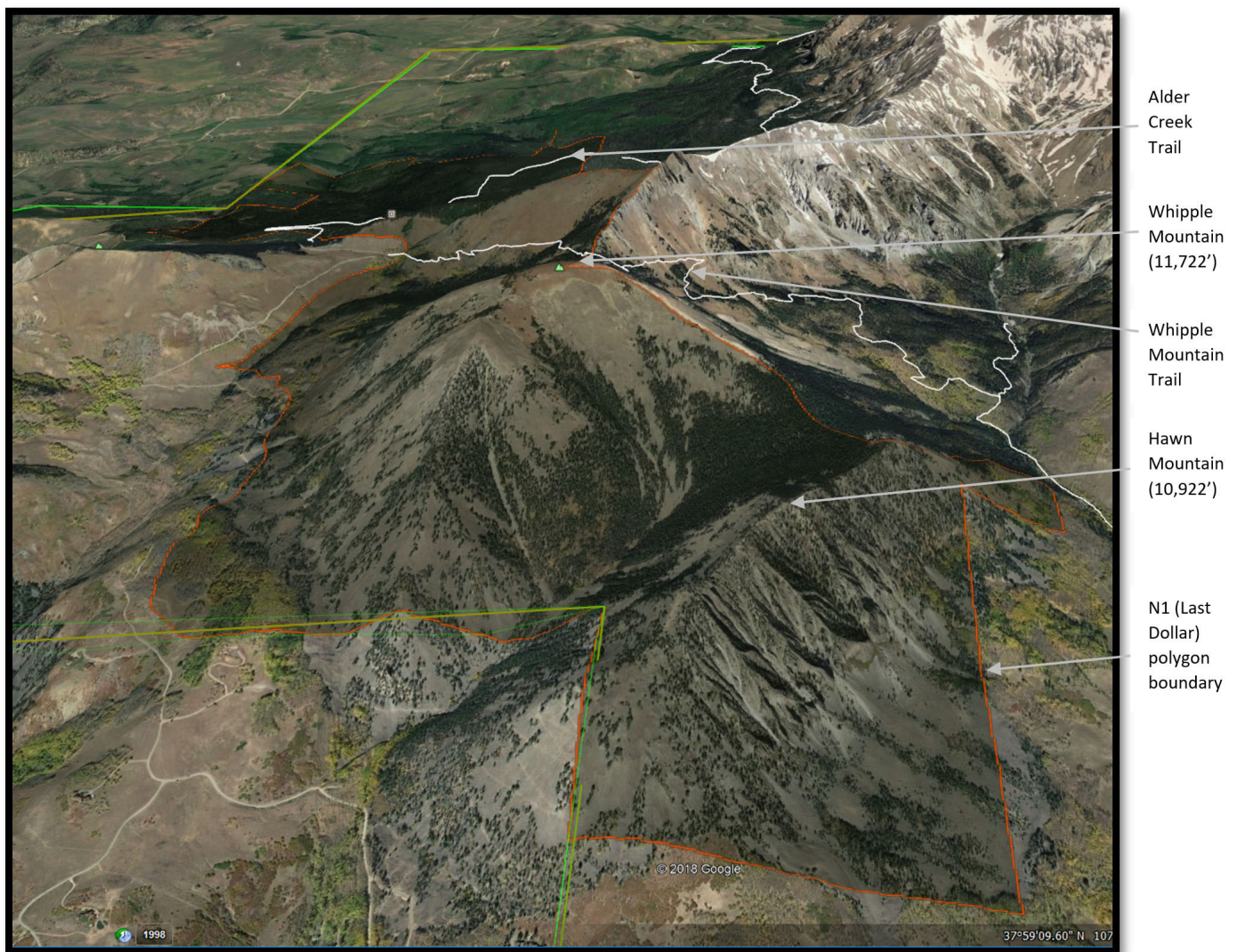


Figure 7. View from Google Earth looking north, showing polygon N1 (outlined in red) and the terrain encountered by Alder Creek Trail, Whipple Mountain Trail and the ridge of Hawn Mountain and Whipple Mountain peak (green triangle). Also showing a high degree of naturalness within the polygon.

Manageability. Due to the adjacency of the Mount Sneffels Wilderness, the shape of the polygon and limited number of private property parcels, the majority of the polygon should have a high degree of manageability.

Summary Polygon N1. The wilderness evaluation rating for this polygon meets the evaluation criteria to receive a rating of “high.” Polygon N1 overlaps the proposed Last Dollar Addition parcel of the SJMWA, which was thoroughly evaluated and designed to protect existing wilderness characteristics and avoid conflicts. This polygon should be included in the wilderness assessment phase and in one or more alternatives being developed for the plan revision process.

2. **Evaluation Polygon N2. Sunnyside Telluride, 9601 acres.** The draft Wilderness Evaluation Report rated this parcel as “moderate” and notes a variety of historic mining infrastructure, trails and other improvements present which were found to detract from the apparent naturalness. However, the majority of this polygon was identified as proposed recommended wilderness management areas in the 2007 proposed forest plan with summer ROS of primitive wilderness, semi-primitive wilderness, or semi-primitive non-motorized. In the draft Evaluation Report, this polygon is discussed as having a different degree of wilderness characteristics and improvements in the eastern portion than the remainder of the polygon. It appears the degree of wilderness characteristics in the eastern third of the polygon is driving the overall evaluation rating. This polygon should be able to reflect the degree of wilderness characteristics, similar summer ROS conditions and areas recommended for wilderness that were products of the 2007 planning process.

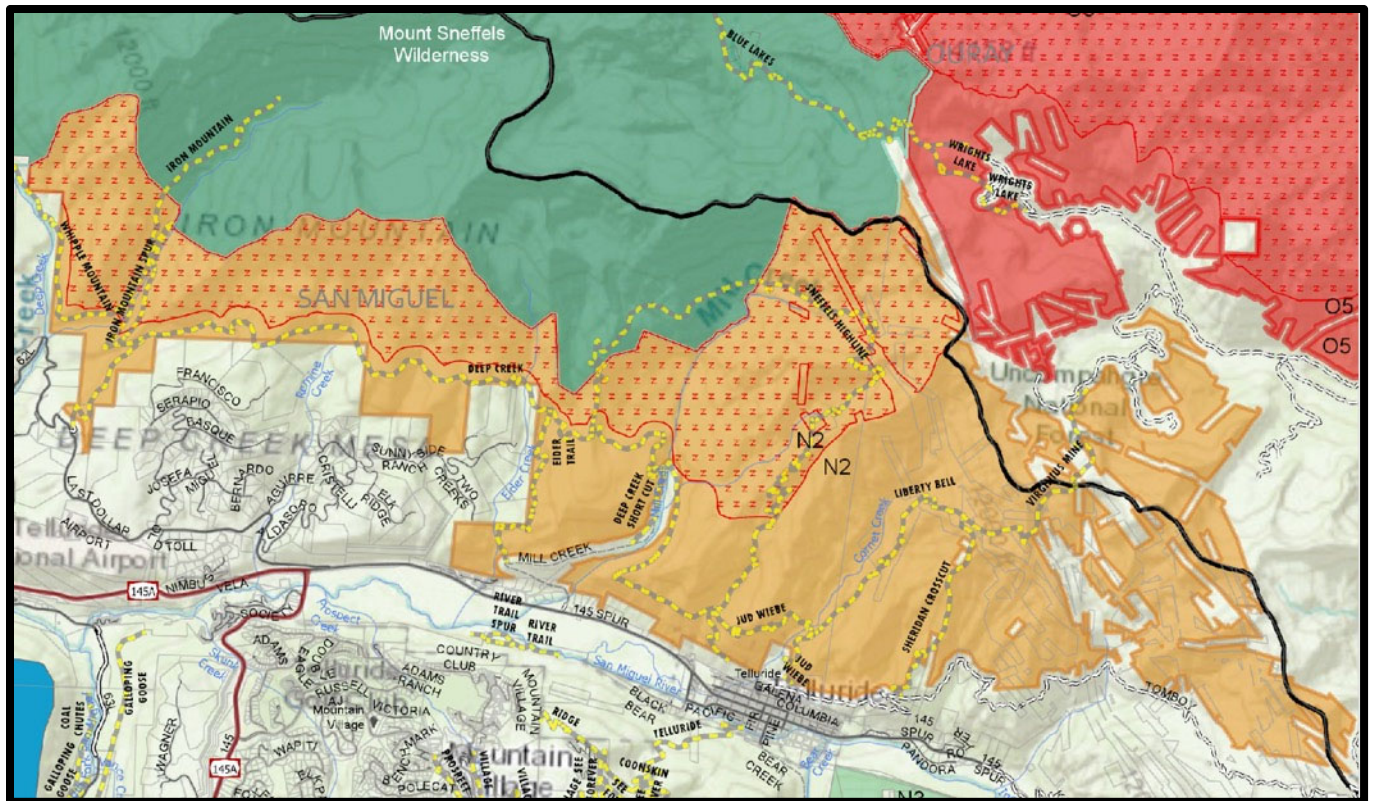


Figure 8. Showing polygon N2 (orange) in relation to Mount Sneffels Wilderness, and several trails referenced in the draft Evaluation Report. The red “z” hatching shows areas within polygon N2 that were recommended for wilderness by GMUG during the 2007 planning process.

With the goal of establishing polygons with similar degrees of wilderness characteristics, we recommend dividing polygon N2 into two or more sub-polygons. One suggestion is to make the inventoried lands north of Deep Creek Trail and Jud Wiebe Trail and west of Liberty Bell Trail into one polygon (see N2.a in Figure 9 below) with the lands south of Deep Creek Trail and Jud Wiebe Trail another polygon (see N2.b below). The remainder of the lands around Liberty Bell (see N2.c) could be in a third and those that straddle the San Miguel – Ouray county line could be in a fourth (N2.d). Each of these areas has different degrees of wilderness characteristics and/or manageability levels.

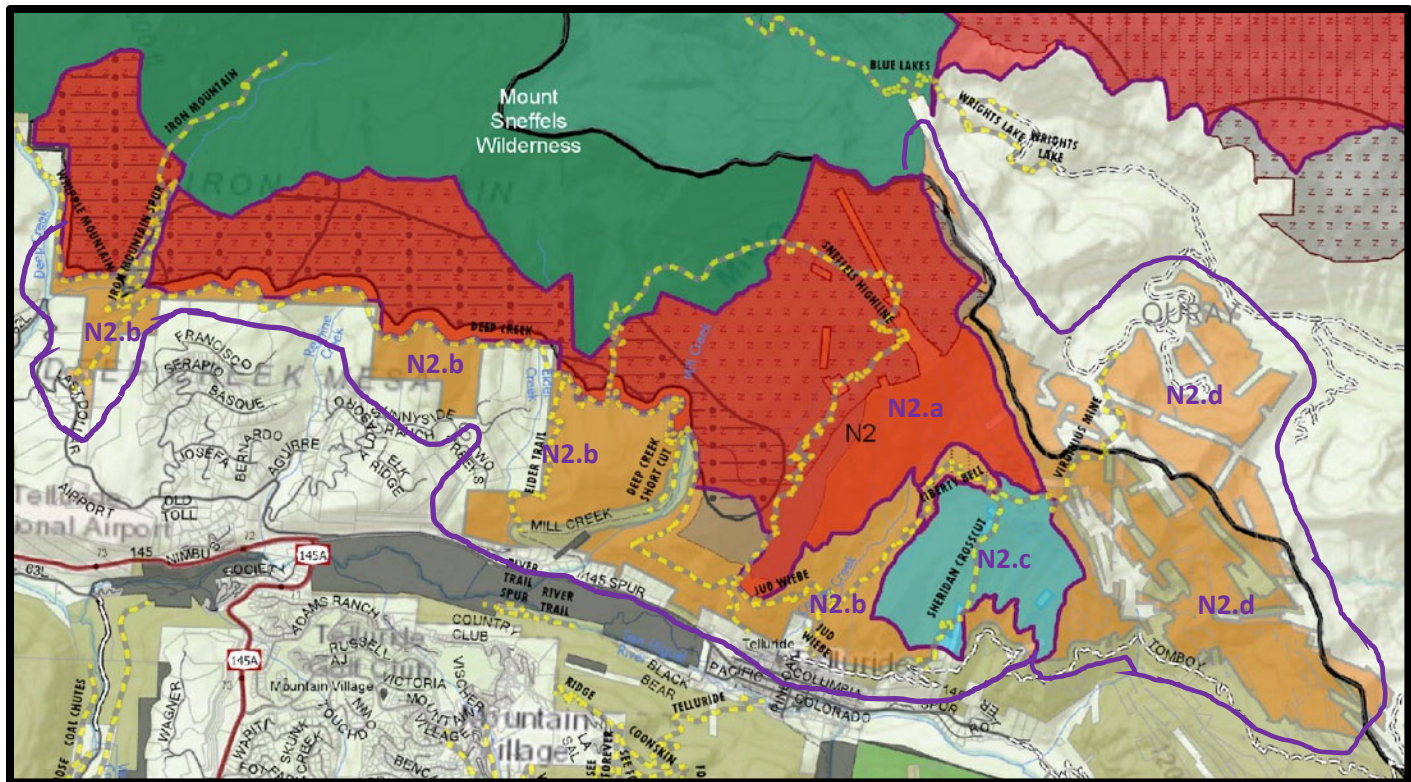


Figure 9. The roughly sketched purple lines show how the inventoried lands within the current N2 polygon (in orange) could be broken into sub-polygons so that lands having more similar wilderness characteristics could be distinguished and rated in the evaluation process.

Evaluation of N2 Proposed Sub-Areas

Area N2.a (See Figure 9)

Apparent Naturalness. Most of this area is within the Last Dollar/Sheep Creek CRA and considered in one alternative of the 2012 Colorado Roadless Rule for Upper Tier. There were no substantially noticeable areas mapped during the inventory, but there are a few doughnut holes that were buffered around possible historic mining features. Nearly all of this area is potential lynx habitat mapped by CPW. The upper elevations contain white-tailed ptarmigan habitat. This area includes elk summer concentration areas, migration corridors and the lower elevations include elk production areas. The inventory found only five possible areas of historical features which do not detract from the area's naturalness as a whole. The apparent naturalness is high.

Solitude or Unconfined Recreation. While the topography buffers the sights and sounds of populated areas in the higher elevations, this area has a high degree of unconfined recreation. The trail use is light. The heavy use on the Jud Wiebe Trail occurs on a small loop close to Telluride. The GMUG website describes the Sneffels Highline Trail use as "light", even during the summer months.²⁷ It contains portions of the Jud Wiebe and Sneffels Highline Trails, the Iron Mountain Trail and a portion of the Whipple Mountain Trail forms the western boundary. The interior of this area

²⁷ <https://www.fs.usda.gov/recarea/gmug/recarea/?recid=32452>

is untrailed and open for unconfined primitive recreation. None of the trails allow motorized use. Nearly all of this area was identified as “primitive wilderness” in the 2007 preferred management emphasis areas map. It has a high degree of unconfined primitive recreation opportunities.

Size. This area is adjacent to the Mount Sneffels Wilderness on its entire north boundary and is over 4,400 acres. The southern boundary would be identified by buffers of existing trails.

Unique and Outstanding Qualities. This area includes the southern portions of Ruffner Mountain, Iron Mountain, Campbell Peak, Greenback Mountain and Mill Creek falls with the San Sophia Ridge as a backdrop to the north. This area is incredibly dramatic due to the serrated ridgelines and the color bands exposed in mountain slopes above tree line.²⁸

Manageability. This area contains the northern portion of the original GMUG evaluation polygon N2 that was found to be manageable in the draft Evaluation Report. Most of this area was previously recommended for wilderness in the 2007 planning process. This area also includes the proposed Liberty Bell Wilderness Addition of the SJMWA.

Summary of N2.a. Wilderness Evaluation polygon N2 should be split into sub-polygons (see Figure 9). We recommend N2.a rated with a “high” degree of wilderness characteristics, included in the GMUG analysis and included as recommended wilderness in one or more alternatives during the planning process.

Area N2.b (See Figure 9)

Apparent Naturalness. A minority of this area intersects the Last Dollar/Sheep Creek CRA. There were no substantially noticeable areas mapped during the inventory. Nearly all of this area is potential lynx habitat mapped by CPW. This area includes elk summer concentration areas, migration corridors and the upper elevations of this area includes elk production areas. The apparent naturalness is high.

Solitude or Unconfined Recreation. This area is bounded by the Deep Creek Trail on the north and includes Mill Creek Waterline and lower Jud Wiebe Trails, that form a popular hiking/biking loop. The trail use in this area is heavy and suggested by San Juan Huts for clients biking the hut system between Telluride and Moab. The heavy hiking use on the Jud Wiebe Trail occurs on a small 2-mile loop close to Telluride. Nearly all of this area was identified as “recreation focus area” in the 2007 preferred management emphasis areas map, with a sub-area between Eider and Cornet Creeks identified for “primitive.” It was also identified as “semi-primitive” summer ROS in 2007.

Size. This area is not adjacent to existing wilderness.

²⁸ This website has photos taken by non-professionals, demonstrating the spectacular scenic beauty and conditions on the Sneffels Highline Trail: http://www.americansouthwest.net/colorado/san_juan_mountains/mill-creek-basin-wide_1.html

Unique and Outstanding Qualities. This area includes the headwaters of several San Miguel River tributaries and associated riparian and wetland habitat including Cornet, Mill, Eider, Remine, and Sheep Creeks.

Manageability. This area is adjacent to GMUG National Forest lands on the north and numerous private lands on the south.

Summary of N2.b. We recommend that the lands in this area be rated with a “moderate” degree of wilderness characteristics.

Area N2.c (See Figure 9)

Apparent Naturalness. There were no substantially noticeable areas mapped during the inventory. Nearly all of this area is potential lynx habitat mapped by CPW and contains white-tailed ptarmigan habitat. The apparent naturalness is high.

Solitude or Unconfined Recreation. This area contains the Sheridan Crosscut Trail, described by GMUG as having “light” use.²⁹ It is bounded on the north by Jud Wiebe and Liberty Bell Trails, which allow biking. Tomboy Road is south of this sub polygon, within 200 to 800 feet. Nearly all of this area was identified as “recreation focus area” in the 2007 preferred management emphasis areas map.

Size. This area is not adjacent to existing wilderness, but abuts the N2.a area that has high wilderness characteristics and should be recommended for wilderness designation.

Unique and Outstanding Qualities. This area has spectacular views of the San Miguel River valley and surrounding peaks.

Manageability. This area is within GMUG NF lands.

Summary of N2.c. We recommend the lands in the area be rated with a “high” degree of wilderness characteristics, except for the current allowance of biking on Liberty Bell Trail.

Area N2.d (See Figure 9)

Apparent Naturalness. There were no substantially noticeable areas mapped during the inventory. Nearly all of this area is white-tailed ptarmigan habitat mapped by CPW. The apparent naturalness is high.

Solitude or Unconfined Recreation. This area contains the route to the Virginius mine. The majority of mining claims in this area have been acquired by the USFS, but Idarado Mining Co. maintains ownership of claims in and adjacent to the area. Nearly all of this area was identified as “recreation focus area” in the 2007 preferred management emphasis areas map.

²⁹ <https://www.fs.usda.gov/recarea/gmug/recreation/naturereviewing/recarea/?recid=34048&actid=50>

Size. This area is not adjacent to existing wilderness, as sketched for these comments, but abuts the N2.a area that has high wilderness characteristics and should be recommended for wilderness designation.

Unique and Outstanding Qualities. This area has spectacular views of glacial basins and mountain peaks.

Manageability. This area is a mosaic of GMUG NF lands and private patented mining claims.

Summary of N2.d. We recommend a “moderate” rating of wilderness characteristics due to the complex ownership boundaries created by the remaining privately held mining claims.

3. **Evaluation Polygon N3. Bridal Veil. (10,115 acres).** This polygon was rated as having “no” wilderness characteristics, largely due to the fragmented shape. Our comments previously discussed the need to include all lands inventoried in evaluation polygons and to rate the degree of wilderness characteristics present. There are lands between Bald Mountain, Palmyra Peak and the Wasatch Connector Trail that were included in the wilderness inventory but were not included in the evaluation. Including them within polygon N3 would make the most sense, given their proximity and the similarly fragmented mosaic of land ownership.

While we don’t have any suggested changes for the rating given to polygon N3, we want to clarify that the lands within this polygon do provide both trailed and unconfined recreational opportunities in all seasons. Hikers and backpackers enjoy multiple lakes and basins accessed from Bridal Veil Basin within the GMUG and over to the San Juan National Forest. While some trails are obvious mining roads or pack routes, others disappear into the scree and tundra. This polygon does not intersect a CRA area. The history and rugged beauty of the glacial basins and mining artifacts are of regional and national significance.

There are unique and outstanding qualities within N3, but according to the evaluation criteria, the presence of such qualities does not alone affect the evaluation rating. The area is adjacent to and/or intersects the following Potential Conservation Areas (PCA); Prospect Basin/Alta Lakes PCA, Bridal Veil PCA, Bear Creek PCA, and Mineral Basin PCA. The Prospect Basin/Alta Lakes PCA contains S1 ranked northern moonwort, with Altai cottongrass and Boreal Owl. The PCA also includes an important migration corridor connecting potential lynx habitat to the north and east of the town of Telluride and at Prospect Basin to other suitable habitat in the Lizard Head area.³⁰ The Mineral Basin PCA contains a mosaic of rocky alpine tundra and wet alpine meadows with high floral diversity dominated by alpine avens. The late melting snowbanks provide the necessary habitat for San Juan whitlow-grass (*Draba graminea*), ranked S2.³¹ Bear Creek PCA contains an excellent A-ranked occurrence of a state rare (G4/S2S3) aspen forest community, *Populus tremuloides*/Cornus sericea, and a good to fair (BC-ranked) occurrence of a globally rare (G3/S3) tall willow community, *Salix geyeriana* - *Salix monticola*/mesic forb. In

³⁰ https://cnhp.colostate.edu/wp-content/uploads/download/documents/pca/L4_PCA-Prospect%20Basin!Alta%20Lakes_3-3-2018.pdf

³¹ https://cnhp.colostate.edu/wp-content/uploads/download/documents/pca/L4_PCA-Mineral%20Basin_3-3-2018.pdf

addition, two species of ferns, the slender rock-brake and the smooth rock-brake, considered to be rare in Colorado, were found here. Black Swifts, considered vulnerable in Colorado, also have documented nesting habitat at Bear Creek Falls.³² There are several mapped fens within and nearby N3.

4. Evaluation Polygon N4, Sheep Mountain (12,333 acres).

Apparent naturalness.

- The vegetation is largely spruce-fir, aspen, willow carr, grass/forb and tundra/rock outcrop. Vegetation types vary with aspect and elevation. The forested areas are predominantly spruce/fir in the elevations near tree line and mixed conifer in the lower valleys with white fir, Douglas fir and aspen. Above tree line, alpine shrubs and forbs dominate. They are punctuated with rock points, mountain peaks and rock cliffs. About two-thirds of polygon N4 includes lands within the Hope Lake CRA and San Miguel CRA. The way this polygon is drawn, it includes lands that have been altered by mining features and the Hope Lake dam infrastructure, however these are scattered throughout the forested areas and most do not detract from the natural landscape. The wilderness inventory mapped three small “substantially noticeable areas” totaling less than 100 acres. These areas were clear-cut patches dating back to around 1968.
- Portions of the B2 Ice Lake Basin PCA intersect the eastern portion of the polygon between Vermillion Peak (13,884 ft.) and U.S. Grant Peak (13,767 ft.). Between these peaks are Fuller Peak (13,761 ft.) and Pilot Knob (13,738 ft.). The Ice Lake Basin PCA contains A-ranked occurrences of the imperiled San Juan whitlow-grass (*Draba graminea*), a globally imperiled (G2/S2) plant and three wetland plant communities.³³ Mountain Studies Institute mapped several fens within the polygon.
- A portion of the B2 Rolling Mountain PCA also intersects the southeastern portion of the polygon upslope of Hope Lake. This PCA is described as a high alpine basin with rocky slabs and thin gravelly soils. Areas where the snow lasts until late in the year are habitat for two rare mustard species, San Juan whitlow-grass (*Draba graminea*) and Colorado Divide whitlow-grass (*Draba streptobrachia*). The habitat continues around the basin at lower elevations on north-facing slopes, where it reaches almost down to a large wetland known as South Park. The rocky tundra is dominated by mosses, lichens and alpine species.³⁴
- The lower elevations of polygon N4 are mapped by CPW as potential lynx habitat. The northern forested portions of the polygon are elk summer concentration area. The upper elevations are white-tailed ptarmigan habitat.

³² https://cnhp.colostate.edu/wp-content/uploads/download/documents/pca/L4_PCA-Bear%20Creek_3-3-2018.pdf

³³ https://cnhp.colostate.edu/wp-content/uploads/download/documents/pca/L4_PCA-Ice%20Lake%20Basin_3-3-2018.pdf

³⁴ https://cnhp.colostate.edu/wp-content/uploads/download/documents/pca/L4_PCA-Rolling%20Mountain_3-3-2018.pdf

Outstanding opportunities for solitude or primitive/unconfined type of recreation.

Solitude. Due to the large size of this area and the rugged topography, there are opportunities for solitude. Hiking up to the peaks above Ice Lakes Basin is popular, but difficult, so usage is still fairly light.

Unconfined recreation. There are approximately 5 miles of trails within the polygon. The Hope Lake Trail intersects about 2.5 miles of the polygon and is non-motorized, non-mechanized. The lower section of Swamp Canyon Trail is mechanized and portions are used for the Hard Rock 100. Winter use includes backcountry skiing, snowshoeing and heli-skiing. The area within this polygon allows for high-quality primitive activities such as mountain climbing, hiking, non-motorized winter sports, fishing, camping, backpacking and limited mountain biking. The upper elevations were preferred in 2007 for “primitive” management emphasis and the lower elevations were preferred for “backcountry, temporary roads.” The 2007 winter ROS preferred was non-motorized and the 2007 summer ROS was “primitive” in the upper elevations and “backcountry-temporary roads” in the lower elevations.

Size. This polygon is not adjacent to existing wilderness but intersects a large CRA, including upper tier. About three-fourths of the land in the polygon is within the proposed Sheep Mountain Special Management Area of the SJMWA. The boundary of the proposed Sheep Mountain SMA would allow for existing uses and rights while protecting the special habitats, wetlands, and scenic peaks, basins and ridgelines. The proposed Sheep Mountain SMA extends into the San Juan National Forest and San Juan County, including Ice Lakes Basin. The Sheep Mountain evaluation polygon and the proposed Sheep Mountain SMA utilize topographic boundaries on the east side.

Unique and Outstanding Qualities. The outstanding qualities described above warrant special protection in an unimpaired condition. Sheep Mountain in the northwestern portion of the polygon is especially iconic. The ridgeline forming the east boundary of the polygon provides impressive views of multiple mountain ranges.

Manageability. We agree the polygon N4, as drawn for this evaluation process has limitations for manageability. However, the proposed Sheep Mountain SMA in the SJMWA was designed to eliminate potential conflicts, ensure manageability and protect current usage.

Summary Polygon N4. The Sheep Mountain SMA as depicted in the SJMWA has broad-based support from citizens, visitors and businesses in San Miguel, Ouray and San Juan Counties. The majority of polygon N4 is above tree-line and has a high degree of apparent naturalness, unconfined recreation, size, ecological values, and is manageable to preserve its wilderness characteristics. We recommend this area receive a “high” ranking. It should be included as a preferred alternative in the GMUG planning process. The purpose of the proposed SMA is to preserve the recognized wilderness qualities without impacting access to the Hope Lake infrastructure, heli-skiing, mountain biking and the Hard Rock 100.

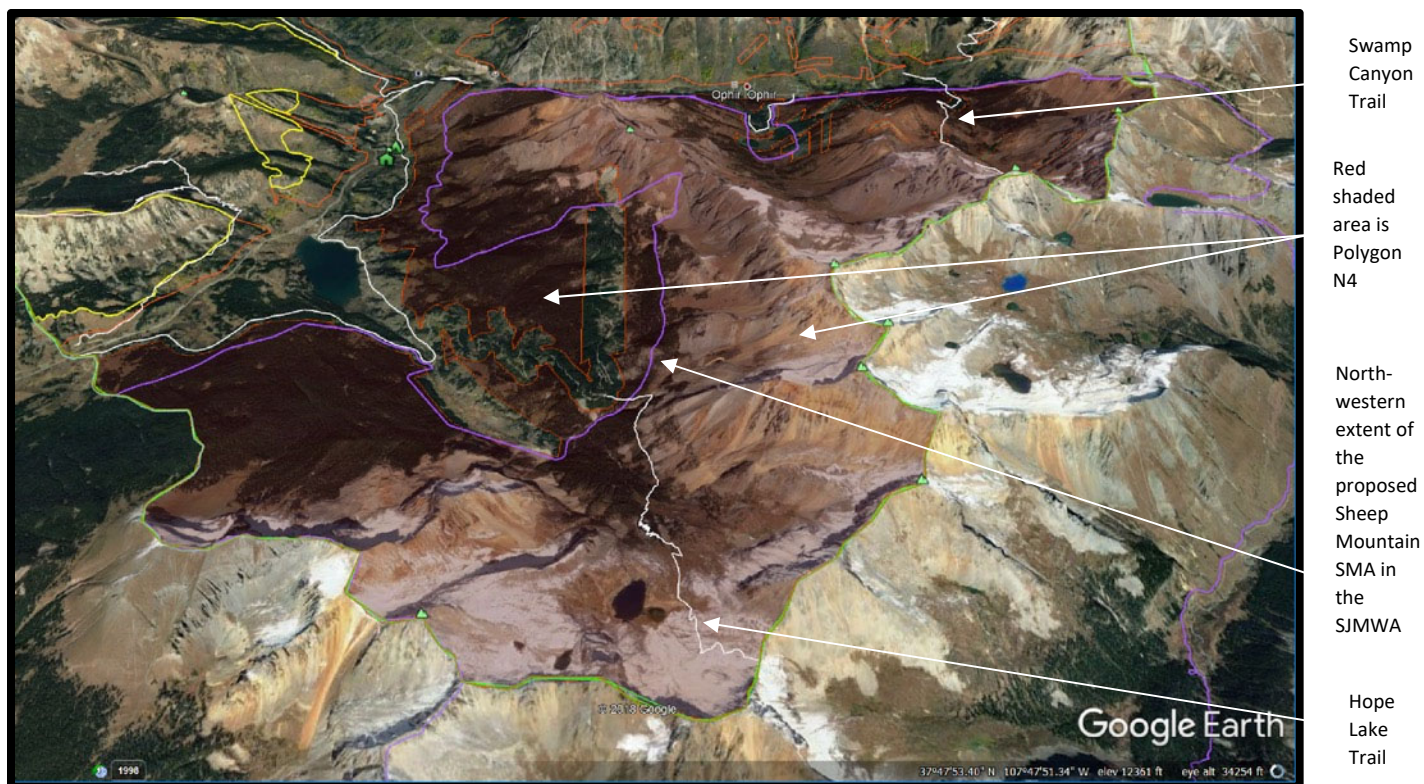


Figure 10. Shown in red-shading, the area within evaluation polygon N4 (Sheep Mountain). The purple boundary line indicates the portion of this polygon that is within the proposed Sheep Mountain Special Management Area of the SJMWA.

5. **Evaluation Polygon N5, Wilson Mesa (3,818 acres).**

Similar to polygon N2, this polygon lumps dissimilar areas together, which does not allow for identifying the portions that have high wilderness characteristics from the areas that are closer to roads and infrastructure, with less opportunities for solitude or high-quality unconfined recreation. We recommend breaking N5 into two sub polygons. The simplest way to do this would be to evaluate the areas having no mechanized trails and providing solitude or higher quality unconfined recreation shown in Figure 11 as the portion of N5 in red and labeled “N5.a” separately from the portion of N5 shown in orange and labeled “N5.b”.

Proposed Polygon N5.a

Opportunities for Solitude or Unconfined Recreation. This area offers limited trails and topographical separation from infrastructure and human activities. For example, the red area on the southeast side of Lizard Head Wilderness, accessed by Lizard Head and Wilson Mesa Trails, climbs steeply away from Highway 145, so that both solitude and the ability to wander off trail are achieved quickly. The areas labeled N5.a are within the SJMWA parcels called the Sunshine, San Bernardo North, San Bernardo South, and Black Face Additions. Lizard Head Trail use is light. GMUG’s website describes this trail #505 as popular with light use.³⁵ Wilson Meadows Trail #512

³⁵ <https://www.fs.usda.gov/recarea/gmug/recarea/?recid=32430>

has slightly more use and GMUG's website similarly describes this as popular with light use.³⁶ In our experience the trails in this area are generally used by campers across Highway 145 for short out and backs with limited use on the full length of the trails.

Apparent Naturalness. This area has unique geology, scenery, and wetlands as well as lynx and white-tailed ptarmigan habitat. The mountain peaks, including Black Face, Lizard Head, and views all the way to the Cimarron Range of the San Juan Mountains are incredible.

Size. The adjacent Lizard Head Wilderness should be considered.

Manageability. These parcels have been vetted with the GMUG and public for more than a decade, and are manageable as wilderness due to their direct adjacency to the Lizard Head Wilderness. The boundaries of these SJMWA parcels have been intentionally pushed upslope to buffer and avoid the Morningstar and Galloping Goose Trails, which provide identifiable limits. Existing Wilderness, high ridgelines and identifiable trails mark these boundaries.

Summary Area N5.a. N5.a should be rated with a "high" degree of wilderness characteristics and included in the GMUG analysis and recommended as wilderness in one or more alternatives during the planning process.

Summary Area N5.b. N5.b should be rated as "moderate" due to higher levels of trail use, proximity to private parcels and Hwy 145.

³⁶ <https://www.fs.usda.gov/recarea/gmug/recarea/?recid=32466>

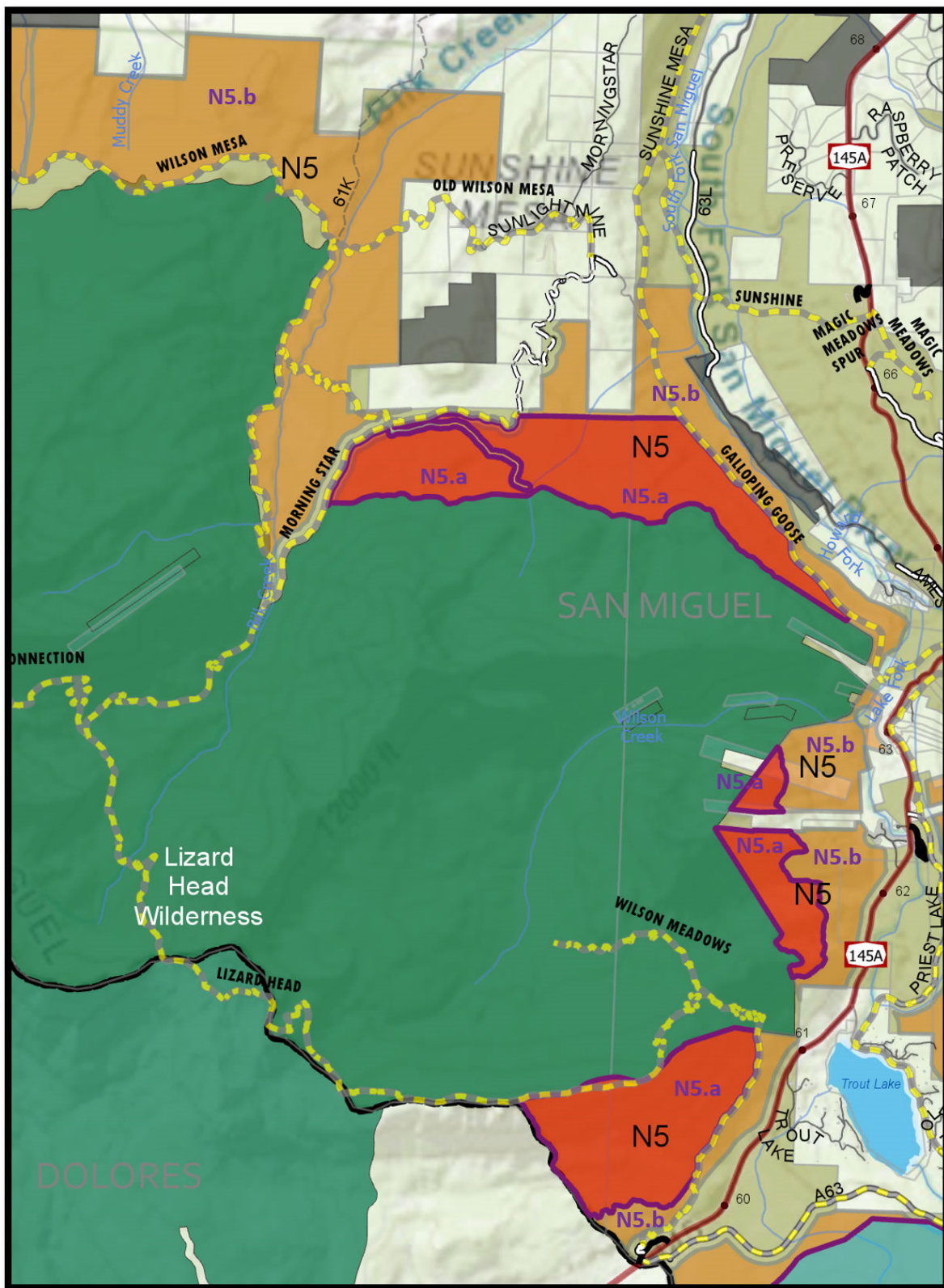


Figure 11. Showing the N5 evaluation polygon which evaluates areas adjacent to the north, east, and southeast of the Lizard Head Wilderness. We recommend N5 be broken into sub polygons.

6. Evaluation Polygon N6, Silver Pick (5,490 acres)

Similar to other evaluation polygons, portions of N6 have a high degree of wilderness characteristics and deserve to be split into similar areas.

Solitude and Unconfined Recreation. The recommended polygons N6.a & b are adjacent to the existing Lizard Head Wilderness and have Wilderness access trails open for hiking and horseback riding. The Wilson Mesa Trail is open for biking and motorized use and is within the area labeled N6.b (See Figure 12). Based on a recent site visit, the Lone Cone Trail west of the campground was similar in naturalness and solitude to the Lone Cone Trail within Lizard Head Wilderness. The Lone Cone Trail sections in an out of the Lizard Head Wilderness are a prime opportunity for solitude in this region. GMUG aptly describes the Lone Cone Trail use as light.³⁷ Several trail reviews mention minimal use and challenging conditions of the Rock of Ages Trail. We disagree with the draft Evaluation Report that lack of vegetation diminishes the opportunity for solitude. Our experience is that this area, although visually spectacular, sees little use except as access to the 14,000-foot peaks. The areas shown on Figure 12 and Figure 14 labeled as N6.a have high quality opportunities for both solitude and unconfined recreation.

Apparent Naturalness. The areas shown in Figure 12 labeled N6.a, have a high quality apparent naturalness. There was a lesser degree of apparent naturalness immediately around Woods Lake and the campground compared to the healthy aspen forest west of the campground. The areas labeled in Figure 12 as N6.a have a high degree of wilderness characteristics including rock outcrops, scree, rock glacier and spectacular views of several iconic peaks in Silver Pick Basin as well as Dolores, Middle and Dunn Peaks in the distance. All of N6 has unique qualities such as geology, rare plant communities, outstanding views of the Wilson Range and beyond.

The eastern half of Silver Pick Basin was recommended for wilderness by GMUG in the 2007 draft management areas and is an upper tier CRA. Adding to the unique qualities, the Silver Pick Basin PCA is within the evaluation polygon and has a B-2 diversity rating by CNHP. This PCA contains occurrences of the San Juan whitlow-grass, which is vulnerable to climate change if summer snow banks do not persist. There are three rare plants identified. CNHP has an excellent description of the native plant community.³⁸ Most of the polygon is mapped by CPW as potential lynx habitat and white-tailed ptarmigan habitat.

Manageability. The Wilson Addition of the SJWMA, contained in N6.a, was created through direct consultation with GMUG staff to maximize protection of wilderness characteristics, improve manageability and avoid conflicts. The areas are manageable due to topographic boundaries and adjacency to Lizard Head Wilderness.

Summary of Area N6.a and N6.b. The proposed Wilson Addition of the SJWMA is within a portion of N6 (labeled N6.a on Figure 12). All N6.a areas, including the area highlighted in Figure 14, should receive a “high” rating and be included in the GMUG analysis and recommended as wilderness in

³⁷ <https://www.fs.usda.gov/recarea/gmug/recarea/?recid=32432>

³⁸ https://cnhp.colostate.edu/wp-content/uploads/download/documents/pca/L4_PCA-Silver%20Pick%20Basin_3-3-2018.pdf

one or more alternatives during the planning process. This includes the portion of N6 within the Silver Pick PCA and on GMUG NF. Areas N6.b should be rated with a “moderate” degree of wilderness characteristics.

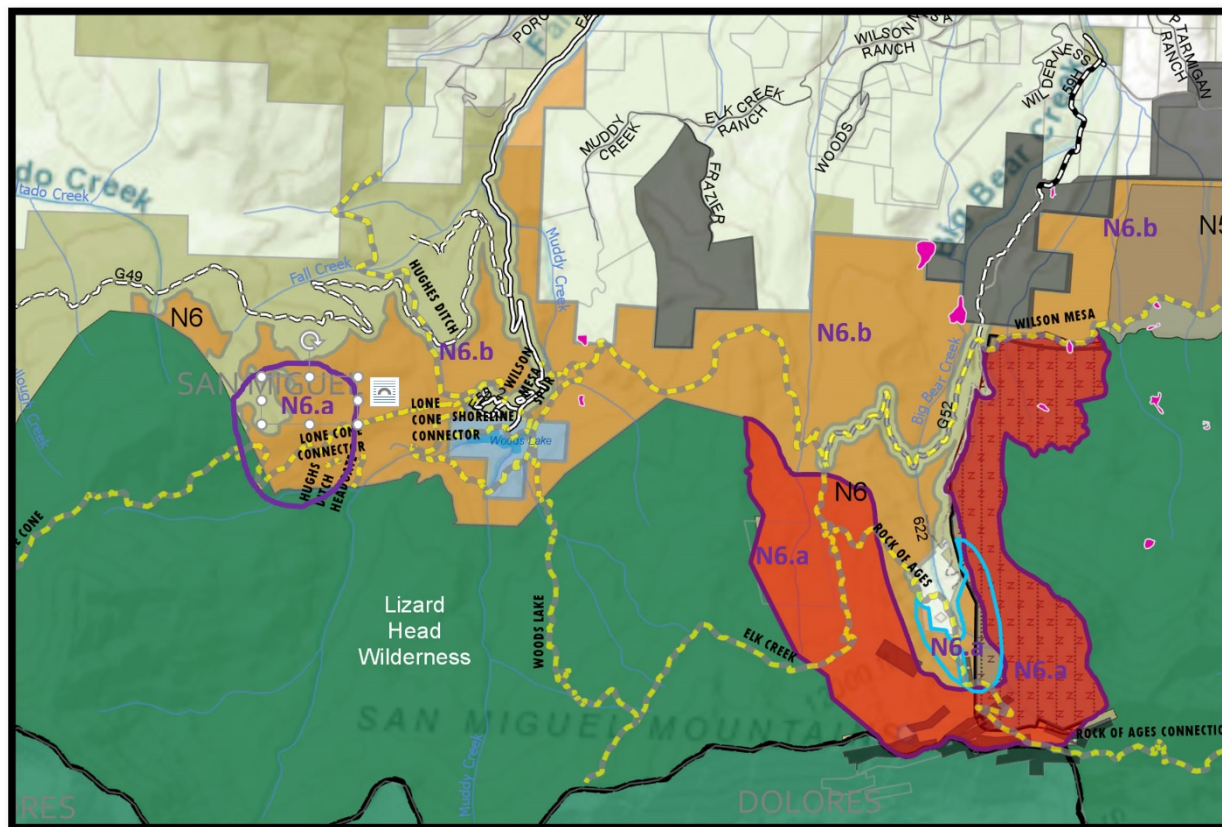


Figure 12. Showing the N6 evaluation polygon which evaluates areas north of Lizard Head Wilderness between Silver Pick Basin/Rock of Ages Trail and west of Woods Lake proximal to the Lone Cone Trail. Showing areas in red, labeled N6.a that have a high degree of wilderness characteristics, and an area also labeled N6.a, (but orange) that is west of the Hughes Ditch headgate and adjacent to the Lizard Head Wilderness, which also has a high degree of wilderness characteristics. The areas labeled N6.b, in orange have closer to a moderate degree of wilderness characteristics.



Figure 13. Google Earth view, looking north, showing the Silver Pick Basin area of N6.a. The yellow outline is the proposed Wilson Addition of the SJMWA. This area has a high degree of wilderness characteristics. Wilson Peak is on the east of the ridge marked by a green triangle symbol. The eastern half of the yellow outlined basin was recommended for wilderness in the GMUG 2007 planning process and is part of the Wilson Upper Tier CRA. The Silver Pick PCA lies in the center of the basin.

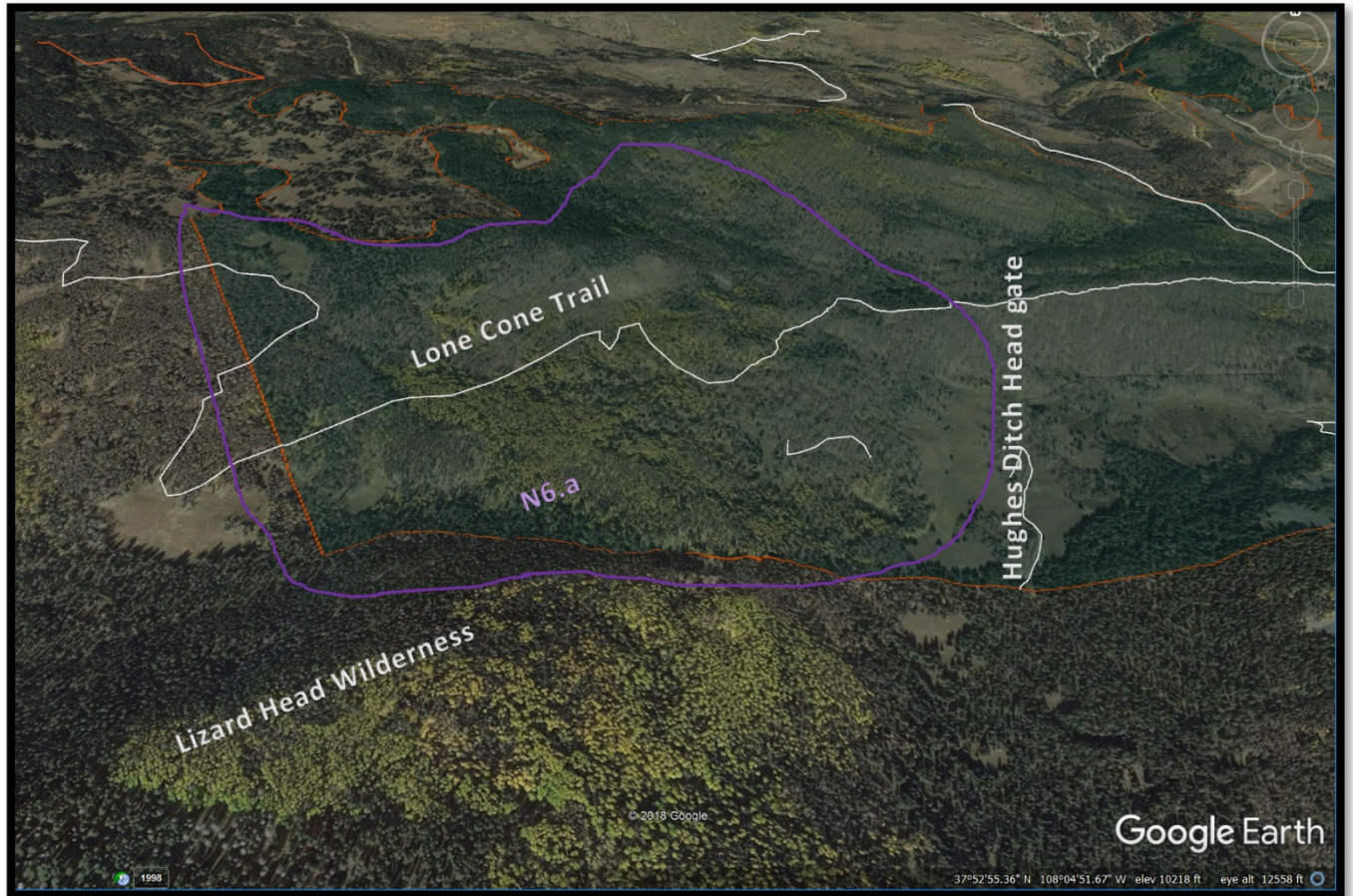


Figure 14. Google Earth view, looking north, showing the portion of N6.a that contains the Lone Cone Trail west of Hughes Ditch, and having similar naturalness to the existing Lizard Head Wilderness adjacent to the west.

7. **Evaluation Polygon N7. Lone Cone (7.037 acres)**

Apparent Naturalness. The draft Evaluation Report found a diminished naturalness of the spruce-fir and aspen communities due to spreading weeds and human activities such as irrigation structures, grazing, snowmobile trail markers and past logging. The Lone Cone Peak Trail is the only trail in this polygon. From FS Road 612, there were short spurs or spikes that went off the road into the trees where dispersed camping was evident, including fire rings. Above the 10,000-foot elevation line we found natural vegetation, with few scattered thistles in disturbed areas like the abandoned roadbed below 10,000. Grazing was evident around the abandoned road, but not upslope. The degree of naturalness appeared to increase dramatically above 10,000 feet. Higher elevation vegetation includes mixed conifer, tundra and scree. The apparent naturalness is high. Forest treatments above 10,000' date from 1968 or earlier.

Solitude or Unconfined Recreation. FS Road 612 appears to be difficult to impassable when wet, especially on the east side. This area is used mostly by local backcountry hunters in the fall. The only trail within the polygon is Lone Cone Peak. Nearby the Goat Creek Trail is open to bikes. Cross-country ski signs, trail markers and orange snowmobile trail markers along the FS 612 road were

visible on a recent site visit. The healthy aspen forests are a prime fall photo opportunity for those who are willing to get there. According to local backcountry hunters who have used this area for decades the Lone Cone Trail in this area receives light use year-round. There are abundant opportunities for both solitude and unconfined recreation.

Size. We identified an area between West Fork Beaver Creek and West Beaver Creek that was in the GMUG wilderness inventory as a Scientific and Natural Area (SNA) and left out of the wilderness evaluation. After scouting the area on foot and using Google Earth, we believe this area should be included due to similar high levels of naturalness, vegetation and topography. The SNA was dated more than 50 years ago. If N7 is drawn to exclude the areas where more recent disturbance occurred and is occurring (below 10,000' elevation) and to include the lands within the SNA, the acreage would exceed 5,000 acres. This would also allow N7 to include four potential fen wetland features included in the Mountain Studies Institute fen inventory.

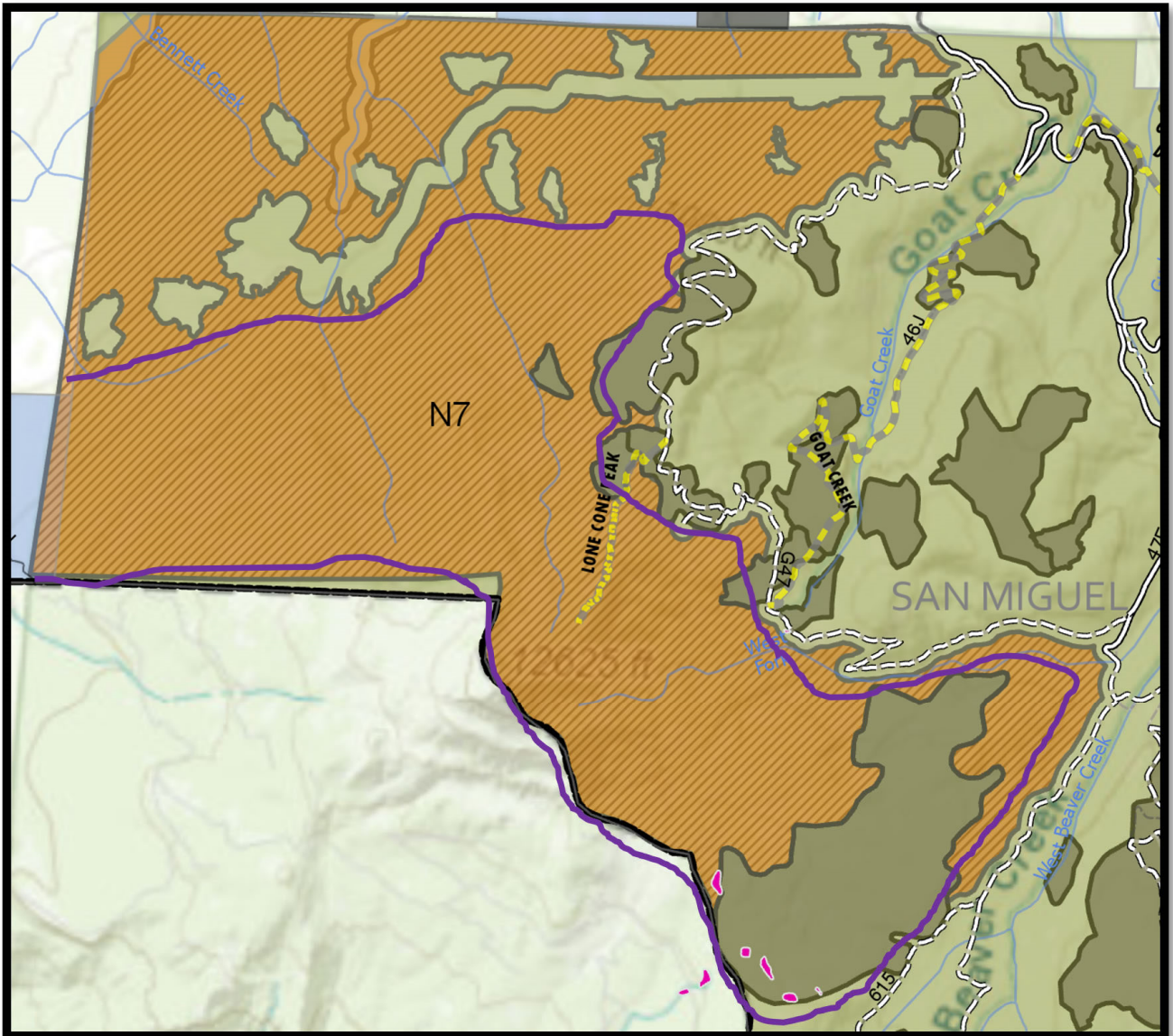


Figure 15. We recommend an alternate boundary for N7 to include lands with similar characteristics, and previously omitted as an old SNA. This would also include four fens (shown in pink) in the southern limit of N7. The rough purple line shows a possible evaluation polygon that would exceed 5,000 acres.

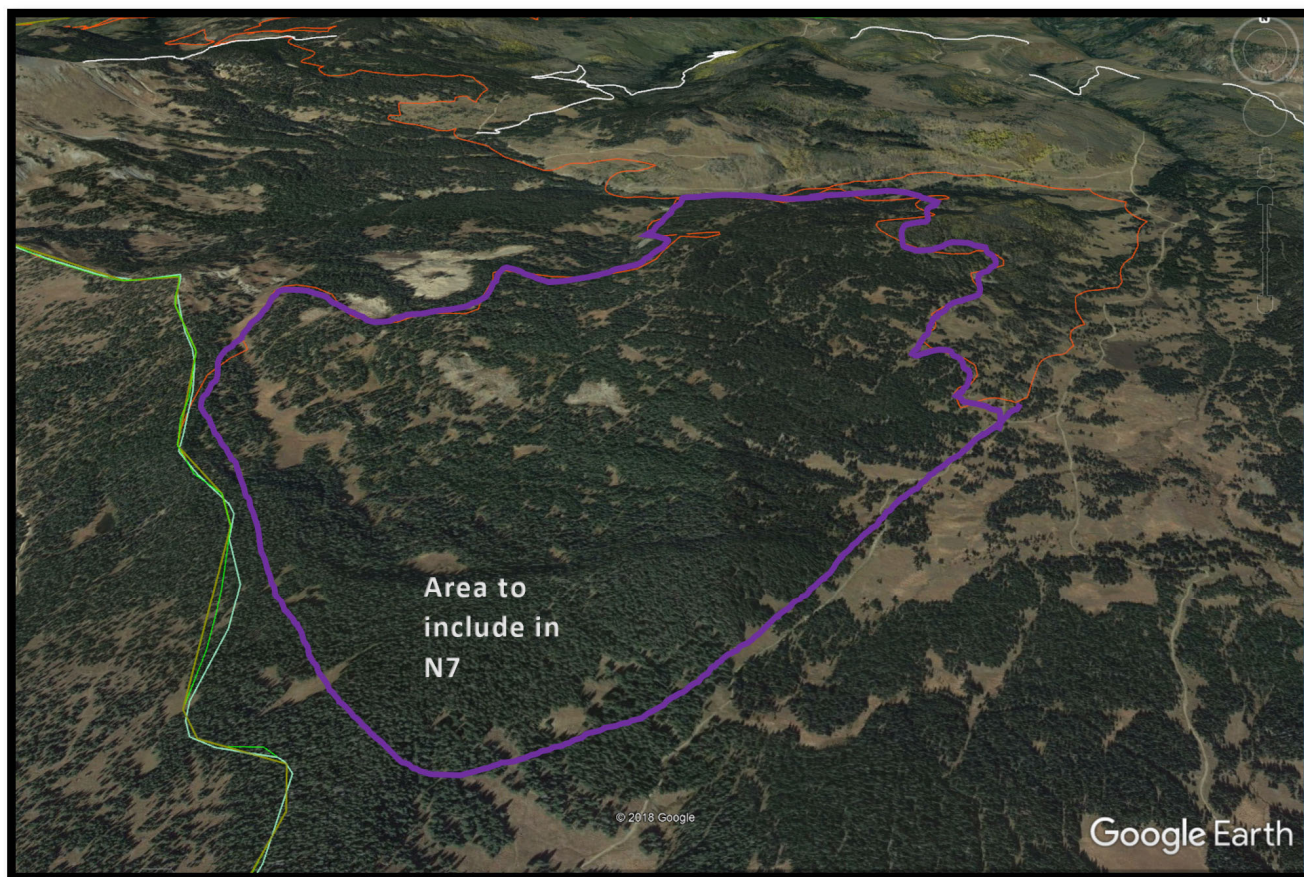


Figure 16. Northerly view in Google Earth of the SNA that was omitted from the inventory. A site visit confirmed that this area is similar to adjacent lands to the northwest included in the N7 evaluation parcel.

Unique and Outstanding Qualities. Lone Cone is the free-standing, western-most peak of the San Juan Mountains. It is visible from much of San Miguel County and neighboring areas, including Dry Creek Basin and Paradox Basin. Most of N7 is within the Lone Cone/Beaver Creek PCA. The symmetrical shape and solitary silhouette of Lone Cone makes it unique and distinct on the landscape. Lone Cone is the headwaters for several important streams, including Goat Creek which supports Colorado River cutthroat trout. Lone Cone is comprised of volcanic rock overlying Mancos Shale.

Manageability. N7 is bounded on the south by the ridge that forms the San Miguel/Dolores County line. FS Road 612 and 615 provide clear limits on the north and east. The 10,000' contour, south of the abandoned road crossing the northern part of N7 also can provide a definitive boundary. The draft Evaluation Report states, "A section of the southern portion could be more effectively managed to preserve its wilderness characteristics due to limited access and use." Our recommended boundary adjustment to N7 could resolve potential grazing and water rights conflicts.

Size. The size issue could be addressed by including lands shown in Figure 16.

Summary N7. The majority of N7 possesses “high” wilderness characteristics. “Moderate” is an appropriate rating for the lower elevation areas in N7 which encompass the old road and more recent timber harvesting.

8. Evaluation Polygon N8, Naturita Canyon (6,950 acres)

We support the comments submitted by Craig Grother/Colorado Backcountry Hunters and Anglers. N8 is described as having “moderate” wilderness characteristics in the draft Evaluation Report. It appears the areas above the canyon rim, described as having evidence of human improvements and less opportunity for solitude, downrated the entire polygon, which is mostly below the rim.

Area is natural. This area contains a portion of The Nature Conservancy's Naturita Creek conservation site and is adjacent to the BLM's San Miguel Area of Critical Environmental Concern (ACEC). Critical Gunnison Sage-grouse habitat is present on the south and east sides of polygon N8.

Solitude or Unconfined Recreation. The steep canyon walls and thick vegetation provide a natural barrier to outside sights and sounds, providing a very high-quality opportunity for solitude within Naturita Canyon. The canyon provides outstanding opportunities for unconfined recreational activities including wildlife viewing, off-trail hiking, hunting and fishing.

Unique and Outstanding Qualities. A significant bluehead sucker population is present in Naturita Creek. There is also habitat for black bear, mountain lion, turkey, mule deer and elk, Mexican Spotted Owl, roundtail chub, and flannelmouth sucker. Bald eagle winter range extends into this area. Big game use the canyon as a migration corridor.

Size. The Naturita Canyon Upper Tier CRA contains 4,400 acres and the full Naturita Canyon CRA contains 4,600. The SJMWA proposed Naturita Canyon Mineral Withdrawal Area contains 6,590 acres and excludes the rim areas that contain improvements, trails and evidence of human activity. The portion of N8 intersecting the proposed SJMWA Naturita Canyon Mineral Withdrawal area has the highest degree of wilderness characteristics, and meets the minimum size criteria since this area is not adjacent to existing wilderness. GMUG should not downgrade the wilderness characteristics of 6,950 acres when there are clear options for differentiating the high degree of wilderness characteristics present on 4,600 to 6,590 acres of N8.

Summary N8. We recommend a rating of "high" for the lands within the Naturita Canyon Mineral Withdraw (SJMWA). And suggest that this area be included in one or more alternatives as potential wilderness. The boundaries of the Mineral Withdraw were created to protect the primitive and rugged wildlife habitat contained in the canyon while avoiding potential conflicts above the canyon rim.

9. Evaluation Polygon N12, East Beaver (3,562 acres).

We support the "high" rating of wilderness characteristics in N12. N12 provides excellent opportunities for both solitude and unconfined recreation. This trail provides access to exceptional backcountry hunting and fishing opportunities, as well as backpacking, horseback riding and other primitive types of recreation.

There is a portion of this area that was excluded from the inventory and evaluation because of an SNA. Examination of Google Earth suggests that this area is similar to the lands included in N12 and the majority of this omission should be included.



Figure 18. Northerly view of N12 using Google Earth. Showing that the majority of the land omitted from N12 due to a SNA should be included. This area was treated prior to 1968.

Summary N12. We support the “high” rating of this polygon. This area should be recommended for a primitive ROS and managed to retain its high-quality wilderness characteristics. In 2007, a portion of this area was recommended by GMUG for Primitive ROS. The entire polygon N12 is within the Lone Cone/Beaver PCA.

10. Evaluation Polygon 05, Whitehouse Mountain (24,314 acres)

Although outside of San Miguel County, we support the rating of a “high” degree of wilderness characteristics for this polygon. Polygon 05 contains the proposed Whitehouse Addition included in the SJMWA. The GMUG forest plan should consider one or more alternatives that would recommend a wilderness designation using the 2018 SJMWA boundary.

The Whitehouse Mountain polygon 05 has an exceptionally high degree of wilderness characteristics. This polygon is adjacent to existing Mount Sneffels Wilderness and has a high degree of apparent naturalness. There are four PCAs that intersect this polygon, along with Whitehouse Mountain CRA and Upper Tier CRA and lands previously recommended as wilderness in the GMUG 2007 planning effort. Unique qualities include the spectacular scenery and geology of Mount Sneffels, featured on Colorado Driver’s licenses, Yankee Boy Basin, Corbett Creek and Corbett Canyon, Blaine Basin and Wright’s Lake. There are high quality opportunities for both solitude and unconfined recreation such as backpacking, day hiking, backcountry skiing, wildflower gazing and dark sky viewing. The glacially carved peaks of the Sneffels Range are prominent. The

GMUG preferred ROS for the land within O5 was Pristine Wilderness, Primitive Wilderness, Semi-Primitive Wilderness, and Semi-Primitive Non-Motorized.

Size: Polygon O5 is large and uninterrupted by human disturbance.

Manageability: The portion of O5 that is proposed as the Whitehouse Wilderness Addition by the SJMWA has been carefully crafted over more than a decade of discussions with GMUG and stakeholders to minimize conflicts and avoid incompatible existing uses. The entire evaluation polygon should retain a “high” rating and the GMUG forest plan process should contain one or more alternatives considering the SJMWA wilderness parcel boundary.

11. Evaluation Polygon O6, Leopard Creek (611 acres)

This parcel intersects the San Miguel County-Ouray County Line. The draft Evaluation Report found that despite two active mining claims, “the area lends itself to be preserved in an unimpaired state due to its limited access and use, lack of existing improvements, and adjacency to existing designated wilderness.” We hope that this logic can be consistently applied to evaluation polygons N1, N2, portions of N5 and N6, N12, and O5; which are all adjacent to existing Wilderness and have lightly used trails.

Dallas Trail is described as being open to bicycles up to the Mount Sneffels Boundary.³⁹ Dallas Trail joins Alder Creek Trail approximately 1.5 miles southwest of the boundary. The proposed Whitehouse Mountain Wilderness Addition parcel in the SJMWA placed the wilderness boundary south (upslope) of the Dallas Trail, to avoid conflicts with mechanized and motorized uses currently allowed. The draft Evaluation Report does not mention Dallas Trail as being within this parcel. We agree that this area has a “high” degree of wilderness characteristics.

³⁹ <https://www.fs.usda.gov/recarea/gmug/recarea/?recid=32606>

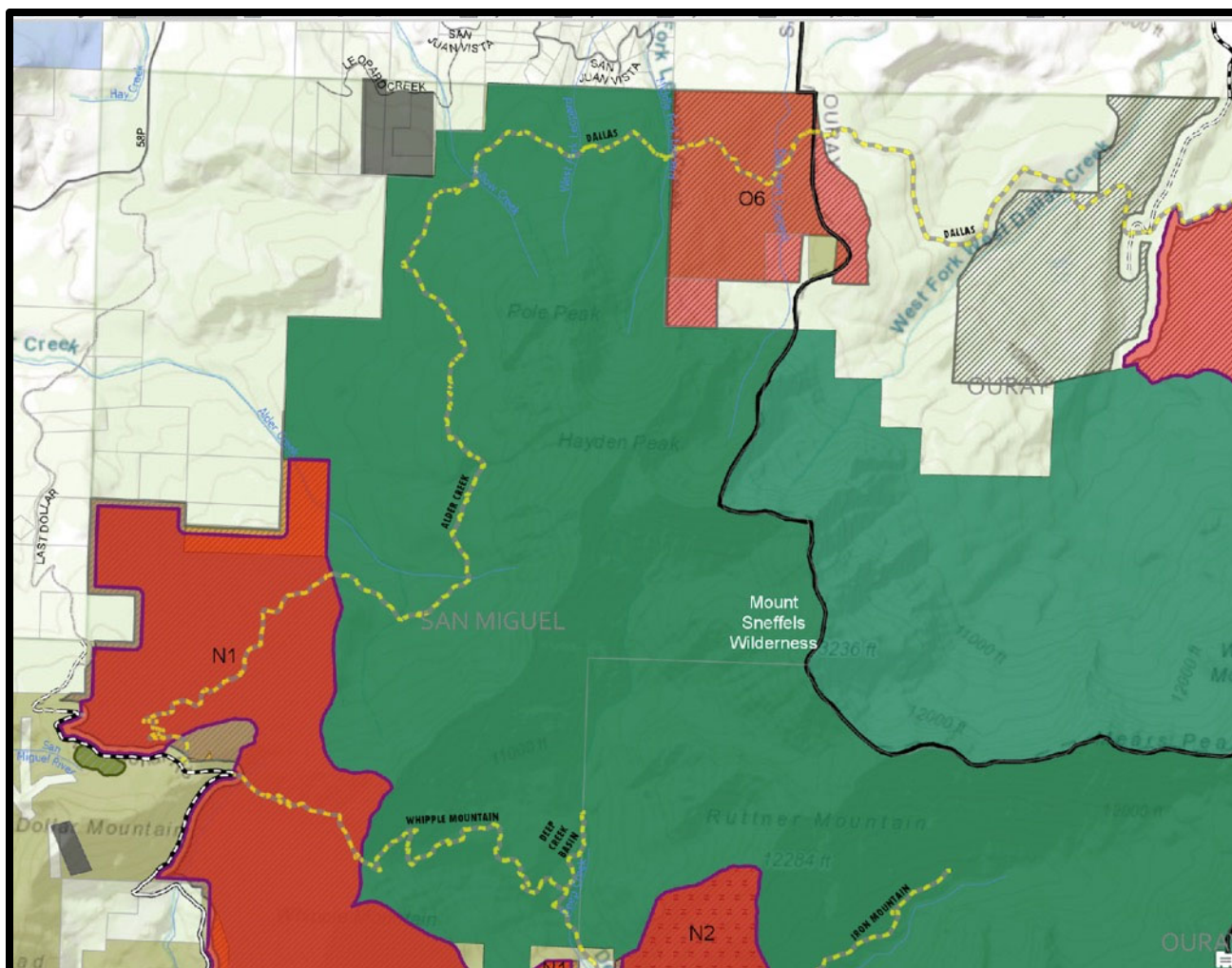


Figure 19. Showing evaluation polygon O6 is bisected by Dallas Trail, not Alder Creek Trail. Dallas Trail becomes Alder Creek Trail inside the existing Mount Sneffels Wilderness. Dallas Trail is open to bikes until it enters the Mount Sneffels Wilderness.

In closing San Miguel County hopes that the information provided in these comments is useful. Our comments were intended to provide additional details that justify the changes to the wilderness evaluation ratings contained in the table on the following page.

Parcel ID	Name	County	District	Draft Eval. Ranking	SMC Eval. Ranking	Notes
N1	Last Dollar	SMC	Norwood	Moderate	High	
N2	Sunnyside Telluride	SMC	Norwood	Moderate	N2.a = High N2.b = Moderate N2.c = High N2.d = Moderate	Break into sub polygons having similar wilderness characteristics. N2a (see page 17) should be High.
N3	Bridal Veil	SMC	Norwood	No	No	Include all of the inventoried lands in the evaluation polygon.
N4	Sheep Mountain	SMC	Norwood	Moderate	High	
N5	Wilson Mesa	SMC	Norwood	Moderate	N5.a = High N5.b = Moderate	Break into sub polygons having similar wilderness characteristics. N5a (see pages 23-25) should be High.
N6	Silver Pick	SMC	Norwood	Moderate	N6.a = High N6.b = Moderate	Break into sub polygons having similar wilderness characteristics. N5a (see pages 23-25) should be High.
N7	Lone Cone	SMC	Norwood	Moderate	High (above 10,000') remainder is moderate	Include the previously omitted area mapped as a 1968 or older SNA.
N8	Naturita Canyon	SMC	Norwood	Moderate	High	High below canyon rim
N12	East Beaver	SMC	Norwood	High	High	
05	Whitehouse Mountain	OC	Ouray	High	High	
06	Leopard Creek	SMC	Ouray	High	High	

Sincerely,

Kris Holstrom
Hilary Cooper
Joan May
San Miguel County Board of Commissioners

San Miguel County's Evaluation Criteria Table

Wilderness Characteristic	GMUG High	GMUG Moderate	GMUG Low	GMUG No
1. Apparent naturalness	naturally appearing composition of p & a species; non-natives if present do not detract from natural appearance;	SOMEWHAT naturally appearing composition of p & a species; non-natives present THAT MAY detract from natural appearance IN PORTIONS OF THE AREA;	DOES NOT REFLECT A naturally appearing composition of p & a species; HAS WIDESPREAD non-natives THAT detract from natural appearance; AND/OR	DOES NOT, AS A WHOLE, APPEAR NATURAL DUE TO DOMINANT NON-NATIVE SPECIES;
	- AND -	- AND -	- AND/OR -	- AND -
	little to no evidence of landscape modifications in majority of the polygon	MINOR evidence of landscape modifications in majority of the polygon	SIGNIFICANT evidence of landscape modifications in majority of the polygon	PERVASIVE LANDSCAPE MODIFICATIONS;
	- AND -	- AND -	- AND -	- AND -
	improvements (infrastructure) are isolated throughout polygon or small in size or concealed by vegetation and/or are historic-rustic structures; do not detract from natural landscape (i.e. evidence of historic mining)	INCLUDES SOME improvements (infrastructure) SCATTERED throughout polygon or small in size or concealed by vegetation; MORE THAN HALF do not detract from natural landscape (i.e. evidence of historic mining)	LARGE PORTIONS OF THE POLYGON ARE DOMINATED BY improvements (infrastructure); MOST detract from natural landscape	PROMINENTLY-EVIDENT PERMANENT IMPROVEMENTS; AND/OR

2. Outstanding opportunities for solitude or primitive/unconfined type of recreation**	▪ abundant opportunities for solitude due to sufficient size and topography that...	▪ SOME opportunities for solitude due to sufficient size and topography...	▪ LITTLE TO NO opportunities for solitude ...	▪ DOES NOT PROVIDE ANY QUALITY opportunities for solitude
	▪ ... most sights and sounds of civilization such as highways and cities and other visitors are buffered; majority are high-quality	▪ ... SOME sights and sounds of civilization are noticeable in SOME PARTS OF THE POLYGON BUT THERE ARE LARGE AREAS WHERE SIGHTS & SOUNDS CAN BE AVOIDED; SOME are high-quality	▪ ... sights and sounds of civilization are PERVASIVE in THROUGHOUT THE MAJORITY OF THE POLYGON; SIGHTS & SOUNDS CANNOT EASILY BE AVOIDED;	
	- OR -	- OR -	- OR -	- OR -
	▪ many high-quality opportunities for primitive or unconfined recreation exists	▪ SOME high-quality opportunities for primitive or unconfined recreation exists	▪ LITTLE TO NO opportunities for primitive or unconfined recreation exists	▪ DOES NOT PROVIDE ANY QUALITY opportunities for primitive or unconfined recreation exists
	- AND -	- AND -		
	▪ visitors can feel removed from civilization, self-reliant, and connected to the land throughout most of the area	▪ Forest visitors feel removed from civilization, self-reliant, and connected to the land TRAVERSING SOME POCKETS OF THE POLYGON	[NOT MENTIONED IN EVAL. CRITERIA NARRATIVE PG. 3]	[NOT MENTIONED IN EVAL. CRITERIA NARRATIVE PG. 3]

3. Sufficient size to make its preservation and use in an unimpaired condition practicable	▪ mostly coherent shape (i.e. smooth boundary w/o many protrusions), ability to be configured along natural terrain boundaries, and proximity to other designated areas would facilitate the preservation of existing wilderness characteristics	▪ OVERALL shape AND CONFIGURATION COULD POTENTIALLY facilitate the preservation of existing wilderness characteristics	▪ IRREGULAR shape AND CONFIGURATION AND LACK OF NATURAL TERRAIN BOUNDARIES WOULD MAKE IT MORE DIFFICULT TO PRESERVE ANY EXISTING WILDERNESS CHARACTERISTICS	ANY WILDERNESS CHARACTERISTICS ARE LIMITED IN BOTH QUANTITY AND QUALITY
4. Ecological, geological, or other features of scientific, educational, scenic, or historical value	▪ may possess unique and outstanding qualities that are iconic or locally, regionally, or nationally important [not required but may enhance grounds for preservation in unimpaired condition]	▪ may possess unique and outstanding qualities that are iconic or locally, regionally, or nationally important [not required but may enhance grounds for preservation in unimpaired condition]	▪ may possess unique and outstanding qualities that are iconic or locally, regionally, or nationally important [BUT THIS CRITERIA ALONE DOES NOT AFFECT THE RATING]	ANY WILDERNESS CHARACTERISTICS ARE LIMITED IN BOTH QUANTITY AND QUALITY

5. Degree to which the area may be managed to preserve its wilderness characteristics	▪ legally established rights and/or relevant laws may create a management challenge but would not greatly affect the ability to preserve its existing wilderness characteristics.	▪ legally established rights and/or relevant laws may create a management challenge but would not greatly affect the ability to preserve its existing wilderness characteristics.	▪ legally established rights and/or relevant laws WILL SEVERELY AFFECT THE ABILITY TO MANAGE THE POLYGON to preserve its existing wilderness characteristics.	▪ legally established rights and/or relevant laws WILL MAKE IT EXTREMELY DIFFICULT TO MANAGE THE POLYGON to preserve its LIMITED wilderness characteristics.
	▪ adjacent lands with a variety of compatible and conflicting management could present some management challenges in successfully preserving the polygon's wilderness characteristics	▪ adjacent lands with a variety of compatible and conflicting management could present some management challenges in successfully preserving the polygon's wilderness characteristics	▪ adjacent lands with incompatible and conflicting management WOULD MAKE IT DIFFICULT TO preserve the polygon's wilderness characteristics	[NOT MENTIONED IN EVAL. CRITERIA NARRATIVE PG. 3]

* Note: "Primitive", "Semi-primitive", "High-Quality", and "Quality" are not defined.

** Consider the inventoried ROS classes within the polygon and extent the polygon could provide for Primitive or Semi-Primitive Non-Motorized ROS class opportunities.