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Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision Working Draft
Attn: Forest Plan Revision Team
Grand Mesa, Uncompahgre and Gunnison National Forests
2250 South Main Street
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Submitted electronically to:
https://cara.ecosystem-management.org/Public//CommentInput?Project=51806

Dear Acting Supervisor Stewart and members of the Grand Mesa, Uncompahgre and Gunnison National Forests Plan Revision Team:

Please accept these comments on the Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG) Working Draft. The Pew Charitable Trusts aims to preserve ecologically and culturally diverse publicly owned lands and waters through congressionally designated wilderness and wild and scenic rivers, and administrative protections. Consistent with these goals, we have an interest in the implementation of the Forest Service's 2012 planning rule, particularly as it applies to the identification and management of Recommended Wilderness Areas (RWAs), eligible Wild and Scenic Rivers, and the utilization of management tools that best maintain and enhance big game habitat and migration corridors.

Our comments on the Working Draft focus on areas recommended for wilderness designation, rivers eligible for Wild and Scenic designation, and other land conservation components of the revised forest plan. We appreciate the agency's efforts to identify, assess, and manage these conservation lands and rivers as part of the planning process.

Recommended wilderness areas and other conservation designations

The 2012 planning rule requires the Forest Service to identify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System during the plan revision process and determine whether to recommend any such lands for Wilderness designation [36 CFR 219.7(c)(2)(vii)]. Chapter 70 of the 2015 Planning Directives provides specific guidance for the wilderness inventory and evaluation process.

In 2007, the Forest Service issued a Proposed Land Management Plan for the GMUG National Forests, which recommended 123,680 acres of the Forests for wilderness designation. Shortly thereafter, the GMUG's revision process was postponed. In the current Working Draft, the Forest Service has identified 22,400 acres of wilderness areas to be analyzed. All of these areas are proposed for wilderness designation in the Colorado Recreation and Economy (CORE) Act

(S.241/H.R.823), which is currently pending in Congress. Chapter 70 of the 2015 Planning Directives directs the Forest Service to evaluate potential wilderness recommendations based on criteria included in section 2(c) of the Wilderness Act, all of which address the potential wilderness qualities of the place itself. These criteria do not take into account whether Congress has proposed an area for wilderness designation, and recommended wilderness should not be limited to such proposals; rather, it is the Forest Service's responsibility to submit such recommendations to Congress based on an evaluation of their wilderness characteristics. Pew recommends that the Forest Service analyze and manage additional lands for recommended wilderness in order to conserve ecological, scientific, cultural, recreational, and other values. At a minimum, the Forest Service should carefully analyze and evaluate those lands that were previously recommended for wilderness designation in 2007, as well as other inventoried lands that may have wilderness characteristics.

Parallel to the Forest Service's inventory and evaluation, citizens in the GMUG region undertook comprehensive analyses to develop proposals to recommend areas for wilderness designation and other conservation designations. The Pew Charitable Trusts generally supports the land use designations and management direction identified in both the Community Conservation Proposal and the Gunnison Public Lands Initiative, and we recommend that they be incorporated in the Forest Service's preferred alternative in the draft plan. This includes protection of wilderness values for the expansive and remote woodlands and red rock canyons of Kelso Mesa, the important summer range for deer and elk in the Upper North Fork Valley's Electric Mountain, and the proposed additions to the popular Uncompahgre Wilderness outside of Ouray. The Pew Charitable Trusts also supports the inclusion of Special Interest Areas (SIAs) and other designations proposed by local conservation and recreation groups in both of these citizen's proposals that would safeguard key wildlife linkages and other important habitat, outstanding opportunities for outdoor recreation, and watersheds critical to local communities.

Management of recommended wilderness areas and other conservation designations

The 2012 planning rule for land management planning requires the Forest Service provide for the "Protection of congressionally designated wilderness areas as well as management of areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation." [36 CFR 219.10(b)(1)(iv)i.] The standards and guidelines in the Working Draft are generally consistent with this requirement. The preferred alternative of the GMUG draft plan should ensure that all standards for designated wilderness and areas recommended for wilderness designation prioritize protection for wilderness values and avoid degradation of wilderness characteristics.

The Working Draft applies a Primitive Recreation Opportunity Spectrum (ROS) designation to designated wilderness areas. In order to protect and maintain wilderness, roadless, and wildlife values, the preferred alternative of the draft plan should apply Primitive ROS classification to areas recommended for wilderness designation, Colorado Roadless Areas (CRAs), and Wildlife Management Areas.

The 2012 planning rule requires the Forest Service to "include plan components, including standards or guidelines, to provide for […] appropriate management of other designated areas or recommended designated areas in the plan area." [36 CFR 219.10(b)(1)(iv)vi.] The Forest Service

should apply standards for CRAs in the GMUG that will maintain or improve roadless characteristics in accordance with the Colorado Roadless Rule. Additional guidelines and standards are necessary to ensure that roadless characteristics are protected as required by the Colorado Roadless Rule where Wildlife Management Area designations overlap with CRAs.

The Forest Service should identify standards and guidelines for SIAs and other conservation designations that protect and enhance the characteristics for which the areas are established. The preferred alternative of the draft plan should only permit activities in those areas which will protect or enhance these values.

Wild and Scenic River Eligibility General Comments

Pew submitted comments on the Draft Wild and Scenic Eligibility Evaluation in March 2019, and look forward to collaborating with the Forest Planning team throughout the planning process. We have incorporated some of our comments on the Draft Eligibility Evaluation into these comments.

The 2012 planning rule requires the Forest Service to identify rivers eligible for inclusion in the National Wild and Scenic Rivers System (36 CFR 219.7(c)(2)(v) and (vi)). During the 2005 eligibility study process, the Grand Mesa, Uncompahgre, and Gunnison National Forests identified 77 rivers as eligible for consideration as wild, scenic, or recreational rivers under the Wild and Scenic Rivers Act. We support updating this inventory of eligible rivers, as is required by the 2012 planning rule, and encourage the Forest Service to focus on eligibility and refrain from addressing suitability in this analysis.

The Grand Mesa, Uncompahgre, and Gunnison National Forests include numerous natural-condition streams that may well warrant protection under the provisions of the Wild and Scenic Rivers Act of 1968 (*P.L. 90-542: 16 U.S.C. 1271-1287*). Those streams provide essential habitat for riparian vegetation, including rare plant communities; habitat for diverse wildlife, including big game, birds, rare and common fish species, invertebrates, and insects, all essential to the dynamic ecological health of the forest; clean water for municipal and agricultural uses; unique recreation opportunities; and inherent scenic and natural values. The draft eligibility evaluation describes a list of sources for listing streams to be evaluated: past river inventories, including the 1983 and 2001-2007 GMUG evaluations; rare-species information (U.S. Fish and Wildlife Service e.g.); adjacent federal land-management units; Nationwide Rivers Inventory; and U.S. Geological Survey maps. While these resources are indeed valuable and should be considered, we urge the Forest Service to also consider stream and habitat information available from the State of Colorado's Natural Heritage Program data and Colorado Natural Areas Program land identifications. This data has unique and often more detailed information that is highly relevant to this evaluation process, so including it in the current planning process would ensure that the Forest is using the best available information for its evaluation.

Specific Comments on River Eligibility

Pew offers specific comments on three aspects of this draft evaluation. First, we have reviewed and offer specific comments on the rivers which have been included in the draft evaluation. Second, we discuss rivers that were found eligible in the 2005 evaluation. And finally, we offer specific comments on rivers that were excluded from this evaluation, but which we believe are eligible for inclusion in the national Wild and Scenic Rivers system.

Rivers Included in the Draft Evaluation Should Be Found Eligible

We appreciate the Forest Service's detailed research, engagement of a thorough and well-grounded set of external sources, and careful internal deliberations which resulted in the selection of stream segments for study. The draft evaluation includes 30 stream segments (in 9 river/watershed contexts), 18 stream segments that had not been previously studied for eligibility. We appreciate the time and effort that went into this evaluation, and we support findings of wild and scenic eligibility for all the stream segments included in the draft eligibility evaluation. Those include:

- Oh-be-joyful Creek and tributaries
- West Elk Creek
- West Soap Creek
- Cooper Creek and tributaries
- Cow Creek and tributaries
- Roubideau Creek and tributaries
- Tabeguache Creek
- San Miguel River
- North Fork Escalante Creek and Kelso Creek

Streams Previously Found Eligible but not Included in the Draft

In addition to the streams listed above that the draft evaluation found eligible, we urge the Forest Service to retain the eligibility of all streams that the Forest Service previously found, in 2005, to be wild and scenic eligible. As discussed in the Forest Service Handbook, all streams that have previously been found to be wild and scenic eligible should retain their eligibility until, and unless, the Forest formally reconsiders that eligibility, presents detailed evidence of changed circumstances that have occurred relative to those eligible streams, and provides the opportunity for public review and comment on those asserted changes.(FSH 1909.12, Chapter 80, 82.2) The draft eligibility evaluation, however, excludes several such streams but includes no such documentation of stream-specific changed circumstances on the following streams (found eligible in 2005), or of other reasons for their exclusion in the current draft evaluation. As such, the Forest should determine that the following streams are eligible:

- Slate River
- East River
- Lower Taylor River
- Escalante Creek
- Bear Creek
- Bridal Veil Creek (falls)
- Ingram Falls

Other streams not included in draft

The GMUG is a very large area with highly diverse landscapes, stream-related landforms, and riparian habitats. Several streams not previously studied for wild and scenic eligibility are free-

flowing and possess at least one outstandingly remarkable value. We specifically recommend that the following additional streams and stream segments be evaluated for wild and scenic eligibility and determined eligible:

- Monitor Creek
- Potter Creek
- Cottonwood Creek
- Beaver Creek
- Fall Creek
- Horsefly Creek

Conclusion

We commend the planning team for its hard work, appreciate this opportunity to comment on the Grand Mesa, Uncompahgre and Gunnison National Forests Working Draft, and look forward to continuing our engagement in this important planning effort. If you have any questions about these comments, please feel free to contact us.

Sincerely,
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