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RE: Comments on Draft EIS for GMUG Forest Plan revision

Dear GMUG:

These comments are offered with respect to several components of the Proposed GMUG Forest Plan and associated Draft Environmental Impact Statement. We are particularly focused on areas that abut the San Juan NF and the BLM's Alpine Triangle under Gunnison Field Office jurisdiction, and on aspects of pending Congressional legislation.

Colorado Wilderness Act

One oversight in the DEIS analysis is the omission of any mention of the pending Colorado Wilderness Act, H.R. 803. The Colorado Wilderness Act is primarily focused on lands administered by BLM along with contiguous tracts under national forest jurisdiction, including several areas on the GMUG NF. The Colorado Wilderness Act is moving through Congress on a similar track as the CORE Act/San Juan Mountains Wilderness bill, and was passed favorably by the U.S. House of Representatives on Feb. 26, 2021. It was previously passed through the House last session of Congress as well, in 2020.

As such, the Colorado Wilderness Act should be referenced and incorporated into the GMUG's planning considerations every bit as much as the CORE Act. Otherwise, the DEIS and proposed plan take an inconsistent approach to incorporating discussion and evaluation of all relevant pending legislation. (e.g. DEIS Vol 2, at 162)

The Colorado Wilderness Act specifically designates as wilderness portions of several roadless areas on the GMUG, including Cataract, Unawep and the Horsefly Canyon area in the southwestern portion of Hanks Valley. Additionally, the wilderness bill includes the Dillon Mesa area adjacent to the West Elk Wilderness. Maps of the areas designated in the legislation are available at <https://www.coloradowildernessact.org/>. The Colorado Wilderness Act is sponsored by four Colorado Representatives – Reps. Diana DeGette, Joe Neguse, Jason Crow and Ed Perlmutter.

We are disappointed in the backtracking by the GMUG in its wilderness recommendations from the 2007 planning effort. It appears the GMUG has decided rather than evaluate wilderness suitability based primarily on natural resource characteristics to instead defer to local county commissioners. This is beyond disappointing as these are “national” forests managed under the “national” forest planning rule and the “National” Forest Management Act. These lands are not under county jurisdiction.

The GMUG should take into consideration the Congressional interest and support in providing federal legislative designations to nationally significant portions of the national forest. Surely, the interest and support for wilderness designation of Cataract, Unaweep, and Horseshoe Canyon by elected members of Congress should count as much as the presumed opposition of local county commissioners in the management of our national forests held in trust for all Americans. We hope the GMUG agrees that members of Congress are as important as county commissioners in the GMUG’s analysis and recommendations.

The 2007 plan aligned closely with the Colorado Wilderness Act and helped inform Congress in crafting appropriate areas for inclusion in the Act. That is one reason why the GMUG’s reversal of course is perplexing and unexplained, after first providing guidance to Congress but now subsequently pulling the rug out from under Congress. The 2007 plan proposed for wilderness designation 9,980 acres of Cataract and 8,350 acres of Unaweep. The 2007 plan also proposed about 1,100 acres of the Dillon Mesa addition to the West Elk Wilderness (a recommendation apparently continued in the 2021 Preferred Alternative B). These areas are all included in the Colorado Wilderness Act, taking into account the GMUG’s prior recommendations. In each case, these are obvious topographic extensions of adjacent areas under BLM jurisdiction proposed for wilderness designation:

Cataract (Alternative D) 10,050 acres: The DEIS accurately describes the wilderness characteristics of Cataract and concludes the area possesses a high degree of wilderness character, has no conflicting resource uses, and is readily manageable as wilderness. (DEIS, Vol 2 at 193) The description overlooks the fact of Cataract’s inclusion in the pending Colorado Wilderness Act. Given the geographic circumstances of Cataract as the uphill portion of the adjacent Handies Peak WSA (previously recommended for wilderness by BLM), it makes obvious sense to stick with the 2007 wilderness recommendation.

Unaweep (Alternative D) 8,214 acres: The wilderness evaluation of Unaweep is confused by its amalgamation into a much larger inventory unit three times the size of the high quality wilderness component in the western portion of the area. The DEIS analysis apparently downgrades the overall wilderness characteristics assessment of Unaweep to medium because of the inclusion of areas with extensive roads, trails, motorized use, and historic timber use. (DEIS Vol 2 at 263) A more appropriate analysis of Unaweep focused only the high quality portion that is included in the Colorado Wilderness Act, and which is contiguous with BLM’s Lands with Wilderness Character unit, should be included in the final EIS.

Dillon Mesa (West Elk Addition) (Alternatives B and D) 1,128 acres: The DEIS appropriately describes the area as possessing a high degree of wilderness characteristics and adds to otherwise underrepresented ecosystem types. (DEIS Vol 2 at 370)

Horsefly Canyon (No alternatives) The DEIS acknowledges the presence of wilderness characteristics and the ability to manage for the characteristics in the Horsefly Canyon portion of the larger Hanks Valley roadless area: "However, the southwestern portion of the area currently managed as part of Horsefly Canyon Colorado Roadless Area could be managed to preserve its wilderness characteristics due to its topography, limited access, and lack of improvements or human influence." (DEIS Vol 2 at 306) We encourage an expanded description of these wilderness characteristics in the Final EIS, taking into account the area's inclusion in the Colorado Wilderness Act owing to BLM's contiguous Norwood Canyon area. As the DEIS notes, the area is remote and only accessible via the primitive and poorly maintained Horsefly Trail (NFST 121).

The 2007 draft plan proposed Cataract, Unaweep and Dillon Mesa for wilderness designation. The present DEIS identifies no changed circumstances that would account for the reversal in wilderness recommendations for the Cataract and Unaweep areas, other than vague references that perhaps the GMUG has allowed county commissioners to exercise some kind of veto over national interests in the management of the national forest. In fact, now as compared to 2007, there is much stronger and more definitive evidence from Congress as to the support for legislative designation of these areas as wilderness as demonstrated by favorable passage through the House of Representatives. The GMUG should once again include Cataract and Unaweep in its preferred Alternative B, as was the case in 2007.

Sheep Mountain Special Management Area

The Sheep Mountain Colorado Roadless Area is included within the CORE Act as a Special Management Area, closed to motorized and mechanized recreation use, and managed for its high value primitive recreation opportunities and wildlife habitat. If managed by the GMUG as a Wildlife Management Area in the interim until the CORE Act passes, there should be no increase in trail density within the WMA.

We appreciate the extension in the comment deadline and look forward to your consideration of these comments.

Sincerely yours,



Mark Pearson
Executive Director