

Western Slope Conservation Center · Wilderness Workshop
National Wildlife Federation · Audubon Rockies
Black Canyon Audubon Society

January 7, 2020

Chad Stewart, Forest Supervisor
Samantha Staley, Forest Planner
Grand Mesa, Uncompahgre and Gunnison National Forest
2250 South Main St.
Delta, Colorado 81416

Re: Special Management Area Proposals for the GMUG Forest Plan Revision

Dear Mr. Stewart and Ms. Staley,

Our organizations, and our members and supporters, care deeply about our public lands in the North Fork watershed, many of which are managed by the Forest Service on the Gunnison and Grand Mesa National Forests. The wild forests and healthy waterways in this landscape support an abundance of wildlife, quality backcountry recreation experiences and clean air and water for communities in the North Fork Valley and beyond. We are writing today to share our collective vision for managing important roadless areas and other wildlands in the upper North Fork through the GMUG Forest Plan revision.

As a starting point, we support conservation proposals that have previously been submitted to the Forest Service for many important areas on the Gunnison and Grand Mesa National Forests. Specifically, we support the *Community Conservation Proposal* submitted by High Country Conservation Advocates and partners that proposes protective management for lands with high conservation value.¹ We particularly express our support for the Electric Mountain, Chalk Mountain and Elk Park Recommended Wilderness proposals and the Mule Park Important Bird Area, which was proposed as a Special Interest Area. These areas contain highly valuable wildlands and wildlife habitat, and are core pieces of a broader connected landscape meriting special management attention.

We also support comments submitted by Mr. Pat Stucker which identified an area around Hubbard Creek as meeting the criteria for inclusion in the Forest Service's inventory of lands that may be suitable for Wilderness designation. Mr. Stucker provided the Forest Service with compelling evidence demonstrating that the area meets the criteria outlined in the agency's planning regulations for having highly-rated wilderness characteristics. We urge the Forest Service to thoroughly evaluate Mr. Stucker's comments; add the area to the agency's inventory of wilderness-suitable lands; analyze the area as the Hubbard Park Recommended Wilderness in the GMUG Forest Plan revision; and ultimately adopt a management decision to protect the highly valuable wilderness characteristics of Hubbard Park.

¹ <https://www.gmugrevision.com/>

In addition to articulating our support for the above proposals, we are enclosing three new proposals with this letter that we ask be incorporated into the revised forest plan and analyzed in one or more alternatives, including the proposed alternative, in the environmental impact statement: Mendicant Ridge Recommended Wilderness, Muddy Country Watershed and Wildlife Conservation Area, and Pilot Knob Backcountry Wildlife Conservation Area. We are also resubmitting the Lamborn Special Interest Area and Coal Mountain Recommended Wilderness proposals which were previously submitted by the Western Slope Conservation Center. Collectively, these recommendations would contribute to the 2012 planning rule's overarching goals of ecological sustainability, climate change adaptation, species diversity, and sustainable recreation.

The 2012 planning rule provides for the Forest Service to establish management areas for the purpose of administratively protecting important conservation areas in a forest plan. The rule defines management area as “a land area identified within the planning area that has the same set of applicable plan components.”² Forest plans are to use management areas or geographic areas to describe how plan components apply to specific parcels of land, with locations shown on maps. Every plan is required to have management areas or geographic areas or both.³ Establishing management areas is an important mechanism for the Forest Service to ensure valuable resources and experiences are appropriately acknowledged and protected; to provide forest managers with direction for implementation activities over the life of the forest plan; and to help the public understand how discrete areas on the forest are managed.

By way of example, the Carson National Forest in New Mexico is revising its forest plan using the 2012 planning rule. The Carson released its draft plan and draft environmental impact statement in July 2019. In multiple alternatives, include the preferred, the Carson proposed several management areas, including: the San Antonio Management Area (117,035 acres) and the Valle Vidal Management Area (100,000 acres).⁴ The San Antonio Management Area focuses on the protection of diverse, resilient, biological communities for future generations, while providing a quality outdoor recreation experience. The Valle Vidal Management Area focuses on the restoration and protection of diverse, resilient, biological communities for future generations, while providing a quality outdoor recreation experience. Similarly, the Cibola National Forest Draft Land Management Plan includes a Conservation Management Area in the proposed alternative to protect values such as wildlife habitat, solitude and backcountry recreation experiences.⁵ The draft plan establishes desired conditions, standards and guidelines to ensure protection of the identified resources and values in the Conservation Management Area.

In addition, the GMUG has stated that “[t]here is a need, per requirements of the 2012 planning rule, to consider additional areas for designation including areas suitable for inclusion in the National Wilderness Preservation System . . . and to review existing information to evaluate what opportunities have been identified in the area and what needs could be met with other

² 36 C.F.R. § 219.19.

³ 36 C.F.R. § 219.7(d).

⁴ Carson National Forest. Draft Land Management Plan. July 2019. Available online at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd631756.pdf.

⁵ Cibola National Forest. Draft Land Management Plan. August 2019. Available online at: <https://www.fs.usda.gov/detail/cibola/landmanagement/planning/?cid=fseprd641963>.

special designations.”⁶ Designating special management areas to protect national forest lands with high conservation values, such as those identified in our proposals, is an important tool afforded the Forest Service under the agency’s planning regulations and reflects widespread public support for conserving our wild forests.⁷

We understand the official public scoping period for the GMUG Forest Plan revision has closed, but also that under the National Environmental Policy Act and relevant regulations the Forest Service is able to accept and consider scoping comments until the point that a draft environmental impact statement is released. We note that the Forest Service currently estimates the draft plan will not be released until late fall 2020. We appreciate your consideration of this letter and our proposals as you move forward with the planning process.

We would welcome a meeting with you and your planning staff in the near future to discuss our proposals. We will also provide geospatial data for these areas.

With sincere thanks,

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⁶ U.S. Dept. of Agriculture, *Grand Mesa, Uncompahgre, and Gunnison National Forests Revised Draft Forest Assessments: Designated Areas*, 48 (March 2018).

⁷ We note that the Rio Grande National Forest failed to take such an approach, and received several objections in response to the draft forest plan that were foundationally premised on the forest’s refusal to seriously consider place-based conservation proposals.