

November 26, 2021

Grand Mesa, Uncompahgre, and Gunnison National Forests
Attention: Forest Plan Revision
2250 South Main Street
Delta, CO 81416

Dear GMUG Planning Team:

The Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests encompass a wide range of landscapes and scenery. It is home to the largest flat-top mountain in the world, several “14-ers,” the tallest waterfall in Colorado, and essential habitat for endangered species like the Canada lynx and Gunnison sage-grouse.¹ It is nationally, regionally, and locally known for its multitude of opportunities for recreation, such as hiking, skiing, and fishing. The Forest Plan revision process that the Forest Service is currently undertaking offers the opportunity to influence how these resources and recreational opportunities will be managed for decades to come.

We appreciate the time and effort the Planning Team has put into the Draft Forest Plan (“Plan”). After reviewing the Plan and accompanying materials, we have identified several areas of the Plan where we believe it is lacking. Please accept these comments on the areas of wilderness designation, timber production, and wild and scenic river eligibility.

I. The Forest Service should recommend more Wilderness Areas

Despite the “variety of social and biological benefits”² provided by wilderness, extensive wilderness loss has occurred both nationally and globally over the last two decades.³ In response

¹ <https://www.gmugrevision.com/planning-101/>

² https://ets.eppley.org/carhart_wa/wilderness_defined/benefits_of_wilderness.html

³ <https://www.sciencedirect.com/science/article/pii/S0960982216309939>

to these losses and the increasing effects of climate change, President Biden announced the “30x30” plan in January with the goal of conserving 30% of US lands and waters by 2030.⁴ This ambitious plan would slow habitat loss and prevent ecosystem collapse. Only a total of 14.2%, or 320 million acres, of US land is currently conserved.⁵ The Forest Service manages 193 million acres of land, and, if President Biden’s 30x30 plan is to become a reality, it is essential that our national forests play an outsized role in helping us get there. We simply cannot meet that goal unless a much larger percentage of our federal lands are protected.

a. Why the FS should adopt more wilderness designations in the GMUG

Under the Plan, the Forest Service has not recommended enough acreage for wilderness management. Currently, 550,000 acres, or 19%, of the GMUG forest is designated as wilderness.

⁶ The 2012 planning rule requires the evaluation of “[e]xisting designated areas located in the plan area, including wilderness and wild and scenic rivers and potential need and opportunity for additional designated areas.”⁷ In the Plan, Alternative D, which was developed from 4 citizen proposals, recommends the greatest amount of additional wilderness with 261,000 additional acres (compared to Alternative B, which recommends only an additional 34,000 acres, and Alternative C which recommends no new additional acres). Even if Alternative D is adopted, only 27% of the GMUG would be recommended wilderness.⁸ The lack of recommended wilderness does not comport with the President’s 30x30 initiative. Simultaneously, the Plan recommends the expansion of areas for timber harvest among all alternatives, excluding these

⁴<https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>

⁵<https://www.resources.org/common-resources/getting-to-30x30-important-considerations-for-the-biden-administrations-conservation-agenda/>

⁶ Draft Revised Land Management Plan, p. 19 [hereinafter Draft LMP].

⁷ 36 C.F.R. § 219.6(b)(15)

⁸ Draft LMP, p. 23

areas from consideration as wilderness. This includes areas that have characteristics that would otherwise be suitable for wilderness designation.

Recommending more wilderness would help achieve the 30x30 conservation goals and would “maximize the resiliency of the forest.”⁹ These areas are important for “biodiversity conservation and sustaining the key ecological processes underpinning planetary life-support systems.”¹⁰ Land-disturbing human activities, such as mineral leasing and timber production, are not permitted in areas recommended for wilderness designation, affording these areas further protections from human influence. The Forest Service should take this opportunity to prioritize ecological health, and in accordance with the 2012 Planning Rule, make decisions using the best available scientific data and information to protect ecosystems.¹¹

The GMUG forest has also experienced an increase in visitation and recreation in the forest since the conception of the previous forest management plan. In a report outlining implementation of the 30x30 policy, the administration emphasized “management planning that identifies lands and waters that are appropriate to be conserved and managed for outdoor recreation.”¹² Acting now to recommend areas as wilderness would ensure that these areas are not available for motorized recreation, which can negatively impact wildlife and alter the physical habitat.¹³ Non-motorized forms of recreation, such as hiking, horseback riding, skiing, and paddling would still be available to visitors in an area recommended as wilderness.¹⁴ While any human activity can degrade wilderness, prohibiting the use of motorized recreation will

⁹ <https://conservationco.org/wp-content/uploads/2020/10/Pathways-to-30x30-1.pdf>

¹⁰ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5726312/>

¹¹ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5362536.pdf

¹² <https://www.doi.gov/sites/doi.gov/files/report-conserving-and-restoring-america-the-beautiful-2021.pdf>

¹³ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsm91_048445.pdf

¹⁴ <https://www.fs.fed.us/r2/recreation/wilderness/faq/index.shtml>

better maintain the conditions of these areas. Recommending areas as wilderness would therefore conform with the administration's goals of ensuring recreational opportunities are available on public lands while balancing biodiversity and conservation goals.¹⁵

The best available science strongly suggests that recommending more wilderness areas would better protect land and resources and prevent degradation of ecosystems.¹⁶ "Intact and functioning ecosystems sequester and protect large amounts of carbon, regulate local climate regimes including hydrological cycles, and provide a direct defense against climate related hazards." Protecting wilderness is the most cost-effective solution to combating climate change.¹⁷ Furthermore, recommending more wilderness areas would improve habitat connectivity and improve the ability of individual species to respond to climate change, which is key to biodiversity and conservation efforts.¹⁸ The GMUG supports populations of endangered and threatened species, including the Canada lynx and Gunnison sage-grouse.¹⁹ Preserving additional wilderness areas, especially those adjacent to preexisting wilderness, will allow for greater areas of intact habitat.²⁰ Large, intact, and connected landscapes, such as those frequently found on public lands like the GMUG forest, are essential to combating climate change.²¹

Because none of the alternatives in the Plan suggest a satisfactory amount of wilderness, the Forest Service should both evaluate and recommend more areas for wilderness in the Plan's

¹⁵ <https://www.doi.gov/sites/doi.gov/files/report-conserving-and-restoring-america-the-beautiful-2021.pdf>

¹⁶ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5726312/#:~:text=Protecting%20wilderness%20areas%20is%20also,%2C14%2C41%2C42.>

¹⁷ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5726312/>

¹⁸ https://www.researchgate.net/publication/315858744_Connectivity_as_the_Amount_of_Reachable_Habitat_Conservation_Priorities_and_the_Roles_of_Habitat_Patches_in_Landscape_Networks

¹⁹ <https://www.pewtrusts.org/en/research-and-analysis/articles/2021/11/05/national-forests-in-colorado-need-stronger-protections-to-help-nature-and-communities>

²⁰ <https://conbio.onlinelibrary.wiley.com/doi/abs/10.1111/cobi.12014>

²¹ <https://www.aspentimes.com/opinion/guest-commentary-protecting-public-lands-gets-support-with-pitkin-county-resolutions/>

final version. This would better achieve 30x30 goals, support the best available science, and demonstrate that wilderness is a “rare and precious” resource deserving of protection.²² We describe some of the areas that we believe warrant wilderness protection below.

b. Alternative B leaves out areas that should be recommended for wilderness designation.

Under Alternative B, lands with high wilderness characteristics that are not recommended for wilderness designation will be open for timber production, oil-and-gas leasing, and mineral exploration. We examine some areas included in Alternative D but not Alternative B. Lack of inclusion in the wilderness recommendation could lead to long-term damage to these areas that should in fact be protected due to high wilderness characteristics and sensitive habitats. We believe the explanation provided for why such critical areas are not included in the wilderness recommendation lack any clear rationale, especially when considered in light of the President’s 30x30 plan..

i. East Elk

Under Alternative B, only 13 percent of the East Elk area polygon (G1) is considered for potential wilderness recommendation, while Alternative D allocates 97 percent of the area for potential wilderness. The rationale provided for inclusion of only 13 percent of the area under Alternative B is simply that the wilderness characteristics were balanced with the value of current and future anticipated uses.²³ This rationale is unpersuasive considering the benefits of including East Elk in the wilderness recommendation. The East Elk area provides suitable habitat for lynx populations, and excellent habitat for big game.²⁴ The National Park Service determined

²² <https://www.fs.usda.gov/detail/ashley/learning/nature-science/?cid=STELPRDB5269725>

²³ Draft EIS Vol. II, p. 411.

²⁴ Draft EIS Vol. II, p. 181.

the waters of the East Elk Creek are in pristine condition. Significantly, there are several features of the East Elk area that ease manageability of the polygon. First, the allocated area includes 66% overlap with a Colorado Roadless Area designation. Areas managed as roadless lend themselves to wilderness recommendations because human activities such as tree cutting and road construction are generally prohibited. Second, the northern and western sections of the East Elk area are adjacent to the existing West Elk Wilderness, while the southern section abuts the Sapinero State Wildlife Area.

ii. Mendicant

Under Alternatives B and C, section GP1a - the 15,495 acre Soap Creek/Medicant-Curecanti area - is not included in the wilderness recommendation, but is included in Alternative D's plan. Similar to East Elk, the Mendicant area is adjacent to the southern border of the existing West Elk Wilderness. This area is currently managed as a roadless area. Despite the numerous ecological and social characteristics that provide the basis for a wilderness recommendation, this area is left out of Alternative B. Again, the rationale provided is that the wilderness characteristics were balanced against the value of existing and future anticipated uses.

c. Areas that should be included that were left out of all Alternatives

To best comply with the aims of the President's 30x30 plan, the Forest Service should consider adding areas as recommended wilderness that were not considered in any of the alternatives. Even Alternative D, which recommends the greatest amount of recommended wilderness, only considers all areas recommended in Alternative B plus the areas in Gunnison

county recommended by citizen proposals.²⁵ By considering additional areas outside of Gunnison County, the Forest Service can expand their recommendations for wilderness and protect those areas that meet wilderness criteria. We offer recommendations for areas that were either not considered in any of the alternatives, or should be expanded to meet conservation goals.

i. Elk Park

While Elk Park is currently recommended as a wilderness area in Alternative D, it only encompasses approximately 9,700 acres.²⁶ We recommend that the Forest Service increase the amount of recommended wilderness area to 21,000 acres, as discussed in the Citizen Conservation Proposal.²⁷ This area would then span from the Chalk Mountain recommended wilderness area to the north, the Priest Mountain Special Interest Area to the west, and contains no open roads in the area.²⁸ The designated motorized routes surrounding Elk Park should define the boundaries of this area.

As an area within the Grand Mesa, which is the last notable geographic feature in Colorado without any officially protected wilderness, Elk Park presents an important area to conserve ecosystems and wilderness that are poorly represented in the GMUG. With aspen and grassland dominated ecosystems, Elk Park provides both elk production habitat and an opportunity for a primitive experience for visitors. Expanding the amount of recommended acres for wilderness in the Elk Park area will preserve these features and ensure that human interference through roads and oil and gas activity will not occur.

²⁵ <https://www.hccacb.org/gmug-alternatives>

²⁶ Draft EIS Vol. II, p. 390

²⁷ <https://www.gmugrevision.com/wp-content/uploads/2019/02/2-Appendix-1-Citizen-Conservation-Proposal201902.pdf>

²⁸ <https://www.gmugrevision.com/wp-content/uploads/2019/02/2-Appendix-1-Citizen-Conservation-Proposal201902.pdf>

ii. Hayden Mountain

Spanning 10,000 acres, Hayden Mountain provides opportunities for hiking and other primitive wilderness experiences that are highly valued by visitors to the GMUG Forest. In an otherwise heavily mined landscape, Hayden Mountain's steep slopes have prevented disturbance that would otherwise impair its natural qualities, and the area contains no roads that would prevent its inclusion as a recommended wilderness area. The area's seclusion also provides important habitat for elk away from roads and other motorized activity. While its steep topography generally prevents human disturbance aside from non-motorized recreation, designating this area as wilderness will ensure its protection for future generations. Formally recommending this area as wilderness will support 30x30 goals.

d. The Forest Service's decision to exclude all timber harvest areas established after 1940 from the wilderness inventory is arbitrary and capricious.

Chapter 70 of the Forest Service Land Management Planning Handbook 1909.12 allows for the exclusion of lands from wilderness designation that have improvements that are "substantially noticeable." The Handbook also states that lands with certain improvements that are not substantially noticeable should be included in the inventory, "recognizing the need to provide for passive or active restoration of wilderness character in previously modified areas, consistent with the intent of the Wilderness Act."²⁹ In the list of lands that should be included despite previous human activities is "timber harvest areas where logging and prior road construction are not substantially noticeable."³⁰

²⁹ FSH 1909.12 - Land Management Planning Handbook, Chapter 70 - Wilderness, 71.22(b) - Other improvements.

³⁰ FSH 1909.12, chapter 70, 71.22(b)(3)

In the Plan's inventory decision matrix for "other improvements," all timber harvest areas "that occurred after 1940 . . . are considered substantially noticeable for the inventory."³¹ The rationale provided is that timber harvest areas "are roaded, interwoven with skid trails, have persistent stumps, etc."³² The decision to exclude all timber harvest areas established as long as 80 years ago is overly broad and goes against the intent of the Wilderness Act and the Forest Service's own objectives within the Plan.

Several standards and guidelines in the Plan are designed to protect the integrity of lands used for vegetation management activities. For example, FW-STND-SOIL-03 states when roads, temporary roads, skid trails, and other types of roads are decommissioned, treatment methods should be used to improve soil productivity and quality.³³ Additionally, FW-STND-TSTN-05 states that methods used to decommission, close, or relocate transportation routes *shall be* designed and maintained to blend with the natural environment.³⁴ After timber harvesting activities are completed, these areas should be restocked with seedlings.³⁵ Further, timber harvesting activities should not occur on lands where "soil, slope, or other watershed conditions may be irreversibly damaged."³⁶ These standards, and others in the Plan, provide for timber harvesting areas and roads constructed for these activities to be restored. Therefore, the decision to exclude all timber harvest areas after 1940 without exception seems incongruous, as these standards should allow for timber harvest areas that meet the criteria for wilderness designation to be revitalized.

³¹ Draft EIS Vol. II at 156.

³² *Id.*

³³ Draft LMP at 40.

³⁴ Draft LMP at 78.

³⁵ FW-STND-TMBR-02, Draft LMP at 75.

³⁶ FW-STND-TMBR-04, Draft LMP at 75.

II. Analysis of the impacts of timber harvesting is lacking.

The first purpose listed under the Purpose and Need statement for the 2012 Planning Rule is to “emphasize restoration of natural resources to make our NFS lands more resilient to climate change, protect water resources, and improve forest health.”³⁷

Unfortunately, it seems that the Draft Land Management Plan for GMUG places greater emphasis on timber activities, to the detriment of other desired conditions in the forest plan.

a. The Forest Service should ensure that the amount of land designated as suitable for timber activities is commensurate with actual demand for timber products.

The Forest Service notes that GMUG is one of the largest timber-producing national forests in the Rocky Mountain Region, and that its timber program plays an important role in supporting the timber industry in Colorado.³⁸ However, from the draft plan, it is unclear whether the demand for timber is sufficient for the amount of land designated as suitable for timber and the estimates for the projected timber sale program. This is particularly important given the tradeoffs between timber sales and the detrimental effect of such timber harvesting on the ecosystems that rely on these forest lands, and for the environment at large. In general, the market for timber in Colorado and the Western United States has declined steadily over the past decades.³⁹ As of 2016, there were 15 facilities operating within the GMUG timber-processing

³⁷ National Forest System Land Management Planning, 77 Fed. Reg. 21162, 21164 (2012).

³⁸ Draft Revised Land Management Plan, p. 9.

³⁹ Grand Mesa, Uncompahgre, and Gunnison National Forests, Draft Forest Assessments: Timber and Vegetation Management, November 2017, at 11
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd563502.pdf.

area.⁴⁰ It is important to note the capacity to process timber in and around GMUG has decreased from 77.5 million board feet (MMBF) to 55.1 MMBF, partially due to mill closures.

The Forest Service has allocated twice as much land for timber suitability in Alternative B as compared to the no-action alternative. The projected timber sale program in all alternatives is based on a series of assumptions made by the Forest Service in regards to demand for timber products and available technology. For example, there are two mills “interested” in Ponderosa pine from GMUG. In addition to two existing purchasers of aspen from GMUG, the Gypsum Powerplant “has also expressed interest” in purchasing aspen. These facilities have the potential to purchase 15,000 CCF of aspen annually.⁴¹ While such statements of interest should be considered in determining timber harvesting projections, they should not be weighed too heavily.

The timber suitability analysis also relies on the assumption that new technologies “could make” timber sales feasible in areas with steep slopes (40 percent and greater). However, timber harvesting on steep slopes requires the use of expensive equipment that can only be operated by highly-trained professionals. Relying on this assumption, Alternative B allows for timber harvesting on approximately 71,500 acres on slopes greater than 40 percent.⁴² This applies to 7 percent of suitable timber acreage within GMUG, which, while small, is not insignificant. Alternative D does not allow for timber harvesting on slopes of greater than 40 percent. Because harvesting on slopes greater than 40 percent is unlikely to be feasible, these areas should not be considered suitable timber acres and therefore should be open for other management options.

⁴⁰ 2017 Forest Industry Technical Report, <https://www.bber.umt.edu/pubs/forest/capacity/GMUGCapacity2017.pdf>.

⁴¹ Draft Plan, p. 177.

⁴² Draft EIS Vol. II at 20.

The timber suitability analysis is in itself flawed. First, the analysis does not take into account economic feasibility of timber harvesting, therefore lands are included as suitable timber acreage although in reality, these areas are not.⁴³ The consequence of this is that these areas will not be considered for other management purposes (i.e. wilderness or research areas) because they are included as a subset of suitable timber acreage. The Forest Service estimates that the suitable timber acreage within GMUG for the next 20 years is actually 650,000 acres - significantly less than the 948,200 allocated in Alternative B. Additionally, slopes of greater than 40 percent are included in the suitable timber acreage for Alternatives B and C, but the Forest Service acknowledges that it is unlikely that timber production is possible in these areas for the duration of the planning period.⁴⁴

This over-inflated calculation further impacts the sustained yield limit calculation. The sustained yield limit calculation is “the amount of timber that could be produced on *all lands that may be suitable for timber production.*”⁴⁵ The estimated sustained yield limit for GMUG is calculated to be 127,765 CCF/year, based on the acres that may be suitable for timber production, 986,500 acres. As noted by the agency, realistically only approximately 600,000 acres are actually feasible for timber harvesting. If the sustained yield limit calculation was based on this lower number, the limit itself would also be lower. While the sustained yield limit is the upper limit for timber harvesting in the forest, the basis for the calculation provides an over-inflated ceiling which leads to the risk of harvesting more timber than is sustainable for the forest.

⁴³ Draft LMP at 232.

⁴⁴ Id.

⁴⁵ Id., at 233 (emphasis added).

Additionally, it is important for the Forest Service to analyze and compare the costs and benefits of using land for timber activities versus protecting those lands for their ecological values. A 2018 report by Outdoor Alliance found that annual visitor spending in GMUG amounted to approximately \$392 million, and \$112.2 million in wages for the 4,148 full-time employees of the park.⁴⁶ The 2017 GMUG timber forest assessment estimated that timber harvest in the forest supported 630 full- and part-time jobs, bringing in approximately \$24 million in labor income annually.⁴⁷ The increase in timber production in Alternative B will only bring in an additional \$7-8 million annually. Comparing revenue and jobs generated by recreation and timber activities, it is clear that recreation generates far more jobs and revenue from visitors annually. This calls into question the decision to double the timber suitable acreage in Alternatives B and C, and to allow for 55,000 CCF of timber harvesting prescribed by Alternative B. Comparatively, Alternatives D allocates less land area for timber harvesting, and provides for only 30,000 CCF annually which strikes a better balance between need for timber resources and protection of the land that sees over 2.6 million visitors annually.

b. The Forest Service should not allow timber activities on any lands outside of those suitable for timber harvesting.

Alternative B allows for 500 CCF annually in Years 1-5 and 1,250 CCF annually in Years 6-20 of timber harvest from areas outside of the lands designated as suitable for timber, including

⁴⁶ The Economic Influence of Human Powered Recreation in Colorado's Grand Mesa, UNcompahgre, & Gunnison National Forests, Outdoor Alliance, 2018
https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/5bff483303ce647407356fc1/1543456828876/OA_GMUGNF_SharePiece.pdf.

⁴⁷ GMUG Forest Assessment: Timber at 17.

from non-upper tier roadless areas.⁴⁸ It is unclear why the Forest Service is allowing for any timber activities in areas that are not designated as suitable for timber. Further, FW-STND-TMBR-3 states that “timber shall not be harvested for the purpose of timber production on lands not suited for timber production.”⁴⁹ This is concerning because much of the land not included in the timber suitability designation is roadless areas with minimal to no development and areas that have high wilderness characteristics but are not included in Alternative B’s limited wilderness recommendations. In contrast, Alternative D explicitly prohibits commercial timber activities outside of areas suitable for timber production.⁵⁰ It is unclear whether the annual allowance for timber harvest from areas outside of timber suitability in Alternative B includes commercial timber production. If this is the case, this part of the plan violates FW-STND-TMBR-3 because timber is being harvested on these lands for the purpose of timber production. We strongly encourage the Forest Service to adopt Alternative D’s approach to limiting timber activities to solely those areas suitable for timber production.

c. The Forest Service has not provided sufficient rationale for its lack of analysis on the larger impacts of timber activities on the climate.

The Forest Service should provide analysis of the projected environmental consequences of timber activities within GMUG. GMUG is one of the largest commercial timber-producing national forests in the Rocky Mountain Region. Under Alternatives B and C, the projected forest acres harvested per decade is two times the amount under Alternatives A and D. Further, Alternatives A, B, and C allow for approximately 100,000 acres for fuel treatments per decade, while Alternative D limits fuel treatment to 50,000 acres per decade. Considering the increase in

⁴⁸ Draft Plan, p. 178.

⁴⁹ Draft LMP, p. 76.

⁵⁰ Draft EIS Vol. I, p. 23.

lands suitable for timber activities, and the differences in annual timber projections between the alternative plans, the Forest Service should further analyze and compare the near- and long-term impacts of these activities on the climate.

i. Carbon storage

The Forest Service has recognized the importance of national forests in the removal and storage of carbon from the atmosphere. Management strategies that focus on retention and protection of forest lands can increase the rate of carbon sequestration. GMUG “contains the most sequestered carbon of any National Forest.”⁵¹ Despite public input regarding the importance of climate analysis, the agency decided not to conduct any further climate analyses due to “scientific uncertainty.”⁵²

The Draft EIS does not provide any analysis of loss of forest carbon due to timber harvesting activities. The Draft EIS notes that the public has requested an alternative that maximizes carbon sequestration, but states that such analysis has not been completed because of scientific uncertainty. However, the Draft EIS also contains data on annual carbon stocks in GMUG from 2008-2015.⁵³ This indicates that the Forest Service does have data available on current forest carbon stocks, thus should be able to provide some estimates of the effects of projected timber activities on total carbon stock.

The Forest Service acknowledges that “the timber program would be smaller in Alternatives A and D, with potentially higher near-term carbon storage,”⁵⁴ but does not provide any quantitative analysis to illustrate the differences between the four proposed plans.

⁵¹ Grand Mesa, Uncompahgre, and Gunnison National Forests, Revised Draft Forest Assessments: Carbon, March 2018, p. 6.

⁵² Draft EIS Vol. 1, p. 25.

⁵³ Draft EIS Vol. 1, p. 250.

⁵⁴ Draft EIS Vol. 1, p. 251.

Considering Alternatives B and C allow for production of 55,000 CCF of timber annually while Alternative D limits timber production to 30,000 CCF annually, the additional loss of forest carbon under Alternatives B and C over the course of twenty years is not insignificant. Further, it is likely that the Forest Service has the data necessary to conduct such analysis, based on the established projections for annual timber harvest acreage under each alternative. [Doesn't it seem particularly problematic to be increasing timber production from current levels (Alternative A) in light of climate change and 30 x 30.

Further, the Forest Service should establish best practices for timber management in order to maximize carbon storage. In the Draft Plan, the management approach for timber activities is to incorporate best management practices, as available, to maximize carbon storage.⁵⁵ Without any further guidance, this statement has little force. The 2018 GMUG Forest Carbon Assessment states that GMUG has recently experienced a downward trend in carbon stored in live trees.⁵⁶ Disturbances that have impacted this trend include harvesting, disease, and fire.

ii. Roads

Road construction has particular consequences on the ecological value of forest lands. The Plan does not provide specific standards for maintenance of Colorado Roadless Area, unlike almost all other “management areas” identified by the Plan (see MA 3.1).⁵⁷ As defined by the 2012 Planning Rule, standards are “mandatory constraints” on project-level decision-making, “established to help achieve or maintain the desired condition . . .”⁵⁸ The Forest Service notes that public feedback “requested that wildlife migratory corridors and sensitive habitats be

⁵⁵ Draft LMP at 77.

⁵⁶ Grand Mesa, Uncompahgre, and Gunnison National Forests, Revised Draft Forest Assessments: Carbon, March 2018, at 4, https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd573532.pdf.

⁵⁷ LMP, p. 92-93.

⁵⁸ 36 CFR 219.7(3)(1)(iii).

excluded from areas suitable for timber production, as well as land requiring new road construction or major reconstruction for access.”⁵⁹ In response, the Forest Service states that such issues are best addressed at the project-specific level, applying the broader forest plan standards and guidelines. While it is understandable that certain details may not be appropriate for the Plan at this stage, the Forest Service should ensure that the standards in the Plan will provide adequate constraints on project-level decisions to prevent negative consequences of road construction for timber harvesting. It would be appropriate for the Forest Service to prohibit road construction in areas where it is known that sensitive habitats are present. This is especially true for species listed under the Endangered Species Act. Under Section 7(a)(2) of the Act, agencies must review their actions to determine whether they will affect endangered or threatened species, or critical habitat.

In the purpose and need statement to Colorado’s roadless rule, the USDA and the Forest Service recognized that road construction and reconstruction for timber activities has a great likelihood of “altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area characteristics.”⁶⁰ Although the Plan stipulates that temporary roads shall be closed and rehabilitated within 2 years follow the completion of the use of the road,⁶¹ it does not erase the damage done to sensitive habitats and ecosystems because the construction occurred at all. Several other standards in the Plan also recommend decommissioning and conversion of roads, but again, these standards do not address the consequences of the road construction in the first place.

⁵⁹ Draft EIS Vol. I at 27.

⁶⁰ Special Areas; Roadless Area Conservation; Applicability to the National Forests in Colorado, 77 Fed. Reg. 39576, 39577 (2012).

⁶¹ Draft LMP at 78.

In Primitive and Semi-Primitive Wilderness Areas (Management Areas 1.1b and 1.1c), the Plan stipulates that access roads should be designed to minimize biophysical impacts, and further states that roads should not be authorized in areas which would adversely affect threatened and endangered plant and animal species.⁶² These directives are a promising starting point.

iii. Air quality

The use of timber harvest and mechanical fuels treatment equipment over the implementation timeframe of the forest plan includes “tens of gasoline and diesel fuel-powered vehicles and specialized equipment on any given day.”⁶³ The 2017 Forest Carbon Assessment also acknowledges that total carbon accounting from timber activities includes factors such as fossil fuels expended to harvest and transport materials. However, the Forest Service has chosen not to monitor these emissions because “the amount of emissions the equipment would produce would be insignificantly small and generally unknowable because we do not know exactly where, when and how many acres would be treated, the number of and types of vehicles and equipment that would be used, and the hours of operation.”⁶⁴

The Forest Service should require GHG analysis for project-specific operations. At the project level, data such as the number of trucks, miles of access roads, and the time period for timber harvesting will be known. When the Forest Service commits to timber sales, it should require such analysis from parties seeking to participate in the commercial activity

III. The Forest Service should designate more Wild and Scenic Rivers

⁶² Draft LMP at 89.

⁶³ Draft EIS Vol. I at 242.

⁶⁴ Id.

“Designation as a wild and scenic river is our nation’s strongest form of protection for free-flowing rivers and streams.”⁶⁵ Wild and Scenic Rivers provide intact and complex habitat in aquatic and riparian ecosystems and unimpaired water quality.⁶⁶ A rapidly changing climate and increased demand for water resources makes conservation of rivers crucial at this time.⁶⁷

In Colorado, there are approximately 107,403 miles of river, “of which 76 miles or one river are designated as wild & scenic.”⁶⁸ This is less than one-tenth of one percent of the state’s river miles.⁶⁹ Under the current management plan, no rivers in the GMUG forest are managed as wild and scenic; this draft contains the first comprehensive wild and scenic eligibility review of rivers in the forest. However, in the Plan, only 13 segments were identified as eligible. That equates to only 4%, or 118 miles, of the 36,000 miles of river in the GMUG forest.⁷⁰ While we appreciate the inclusion of these 13 segments, the draft EIS indicates that 36 miles of eligible wild and scenic rivers were lost between 2006 and 2019. The Forest Service should take this opportunity to add additional segments as eligible for wild and scenic designation. Expanding the eligibility for wild and scenic status will better protect the many miles of river found in the GMUG forest, and would help prevent future losses of rivers that could be considered eligible under the Act.

A. Additional information should be provided about the determination of eligibility for

Wild and Scenic Rivers

⁶⁵ <https://www.fs.usda.gov/managing-land/wild-scenic-rivers>

⁶⁶ https://www.fs.fed.us/rm/pubs_journals/2017/rmrs_2017_rothlisberger_j001.pdf

⁶⁷ <https://ijw.org/reframing-the-wsra/>

⁶⁸ <https://www.rivers.gov/colorado.php>

⁶⁹ <https://www.rivers.gov/colorado.php>

⁷⁰ <https://www.gunnisontimes.com/articles/gmug-draft-revision-reexamines-wild-and-scenic-eligibility/>

To be eligible for wild and scenic designation, the segment must be “free of impoundments and waters are free flowing.” However, “low dams, diversion works, or other minor structures at the time any river is proposed for inclusion” should not bar a river’s consideration as a wild and scenic river.⁷¹ The river segment must also possess at least one outstanding remarkable value (ORV), which are “river-dependent natural, cultural, or recreational resources that are unique, rare, or exemplary at a regional or national scale.”⁷² As per the Forest Service Handbook, additional criteria include scenery, recreation, geology, fish, wildlife, and historic and cultural values.⁷³

The Forest Service should broaden their interpretation of the ORV criteria to include river segments that do in fact possess those ORVs. The Forest Service imposes stricter definitions on what constitutes an ORV than as suggested in the Handbook. For example, in the Handbook, “scenery” is considered an ORV, and “[o]utstandingly remarkable scenic features may occupy only a small portion of the river corridor.” In the definition section of Appendix 11 however, segments should demonstrate “highly diverse scenery and visual attractions over most of the segment.” These definitions set a very high standard that exclude many segments that would otherwise be eligible. Apart from a brief explanation that the criteria were modified “to be more meaningful within the State of Colorado,” the justification for the imposition of stricter criteria for ORVs is not apparent.⁷⁴ While it is within the scope of the Forest Service to impose stricter criteria, the Forest Service should, at minimum, provide an explanation for this decision, considering it significantly narrows the eligibility for wild and scenic rivers. Broadening the

⁷¹ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd543613.pdf

⁷² <https://www.nps.gov/orgs/1912/eligible-and-suitable.htm#:~:text=To%20be%20eligible%20for%20designa tion,a%20regional%20or%20national%20scale.>

⁷³ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd543613.pdf

⁷⁴ Revised Land Management Plan, p. 290

criteria would better support the purpose of the Wild and Scenic Rivers Act and would ensure more river miles are protected,

In a previous inventory of eligible segments of Wild and Scenic Rivers, 18 segments were found to qualify. In this Plan, only 13 segments were determined to be eligible as wild and scenic rivers. The Forest Service should reconsider adding those segments, or providing a detailed explanation of the rationale for their disqualification. For many of the segments that are disqualified, the Forest Service relies upon W-2 Appendix of the 2005 Wild and Scenic Eligibility Evaluation or the 1983 Land Management Plan, while merely listing segments as ineligible without further justification. It should be acknowledged by the Forest Service that conditions have changed since both the 1983 plan and the 2005 evaluation, which have made ORVs even more valuable when considering the loss of 36 eligible miles of wild and scenic rivers in the recent past. The Forest Service should further reevaluate these segments and to determine if they would be eligible given the current circumstances and to provide an updated explanation should they continue to be excluded.

B. Taylor River segments should be recommended as eligible

The 2012 Planning Rule requires forests in their land plans to identify, evaluate, and potentially recommend eligible areas for wilderness designation.⁷⁵ The lower Taylor segment was found to be eligible as a wild and scenic river classified as a “recreation” river in a previous assessment.⁷⁶ The upper Taylor segment was evaluated in the 1983 management plan, a decision that was then reviewed in 2005, and was not considered eligible with little explanation why.⁷⁷

⁷⁵ §219.7 (v)

⁷⁶ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd502020.pdf

⁷⁷ <https://www.gmugrevision.com/wp-content/uploads/2019/03/WSRReviewNotes.pdf>

For both the upper and lower segments of the Taylor River, the Forest Service should revisit this decision and determine that they are eligible.

i. Upper Taylor Segment Should Be Eligible

To be eligible for wild and scenic designation, the segment must be free flowing. The Upper Taylor River, above the Taylor Reservoir from the Headwaters to the Forest Service Boundary near Illinois Creek, satisfies this criterion. While the river does flow into the Reservoir, diversions are minimal and the river has a significantly natural flow regime above the Reservoir.

Secondly, the upper Taylor possesses an ORV through the recreational opportunities it offers. The upper segment of the river provides outstanding rapids and beginner-intermediate paddling runs, which are rare in the GMUG and make this river unique. It provides a range of whitewater experiences, from Class II to Class IV rapids, for novices to advanced rafters and paddlers. The river is also a popular fly-fishing location. These opportunities draw visitors to the river from across the region and the nation, and many locals value this segment for its recreational value. In 2019, the Forest Service even acknowledged the “outstanding recreational value” of the Taylor.⁷⁸ It is unclear why this segment was not found to be an eligible wild and scenic river.

While only one ORV is sufficient to find a river eligible, this segment also provides unique scenery. The upper portion of the river is located in an alpine meadow setting with views of the surrounding peaks. In the March 2018 report on the scenic character of the GMUG Forest, the Forest Service acknowledged the need to integrate scenery management with other cultural

⁷⁸ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd947425.pdf

and natural resources.⁷⁹ The same report further acknowledged that alpine landscapes “provide a unique opportunity for scenic viewing.”⁸⁰ Many other rivers in the GMUG are in highly forested areas and do not offer the same viewing opportunity. It would therefore fit the definition of scenery and align with Forest Service scenery management goals to determine that the upper Taylor is eligible as a wild and scenic river.

ii. Lower Taylor Should Be Eligible

The Lower Taylor River, below the Reservoir from Lottis Creek to the Forest Service Boundary near Almont, is also free flowing and satisfies the first criterion for eligibility as a wild and scenic river. USDA-USDI guidelines state that river segments that flow between an impoundment will not necessarily preclude the segments from eligibility. Below the dam, the river retains its natural flow regime and there are minimal diversions.

Similar to the Upper Taylor River segment, the Lower Taylor also provides great recreational value. This segment of the river has Class III+ rapids and provides opportunities for rafting and paddling for novice to advanced recreationists. This segment attracts visitors from all over the State of Colorado. Furthermore, as a gold-medal fishery, the lower Taylor’s fishing opportunities for large trout attract anglers from all over the nation.⁸¹ The Forest Service has previously stated that Colorado has 322 miles of gold-medal fisheries, and that this does not make the lower Taylor unique in the region of comparison.⁸² As there are approximately 107,000 miles of river in the state, this means gold-medal fisheries represent less than 1%. The extremely

⁷⁹ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd573544.pdf

⁸⁰ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd573544.pdf

⁸¹ <https://cpw.state.co.us/placestogo/Pages/Fishing.aspx>

⁸² https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd610128.pdf

low percentage of gold-medal fisheries indicates that the Lower Taylor provides rare fishing opportunities and is unique to the State of Colorado, and it should be recognized and protected as such. These experiences appeal to a wide range of skill levels and attract visitors from both inside and outside the State of Colorado, meeting the definition provided in the Plan of “recreation.”⁸³ To best preserve the “recreation” ORV, the Lower Taylor should be classified as a recreation river under the Wild and Scenic Rivers Act.

iii. Importance of Designating the Segments as Eligible

Even without formal designation by Congress as a wild and scenic river, finding the Taylor segments to be eligible for inclusion will ensure that they will be managed under the appropriate standard to protect the values that made them eligible. An eligibility designation will protect the free flowing qualities of the river. As “people seek out . . . streams for a variety of recreation activities,” future use of the GMUG indicates an emphasis on water sources.⁸⁴ The Forest Service has further acknowledged that “rivers that provide the most diverse opportunities to the widest range of recreationists are of higher value” in addition to the economic value of recreation in the GMUG.⁸⁵ Because both segments of the Taylor provide whitewater experiences for a wide range of skill levels, both segments of the Taylor should be recommended as eligible and should be classified as recreational to best preserve these opportunities. As an eligible wild and scenic river, interim protection will be guaranteed, providing recreational opportunities to future generations and supporting local businesses who depend on the Taylor.

C. Riparian areas near Wild and Scenic Rivers should be protected

⁸³ Revised Land Management Plan, Appendix 11, p. 293

⁸⁴ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd573544.pdf

⁸⁵ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd939801.pdf

The draft EIS notes that riparian areas are “among the most important and diverse parts of forest ecosystems.”⁸⁶ In the Management Approaches outlined in FW-DC-LSU-01, “lands and associated riparian ecosystems” should be prioritized to “help achieve broader resource protection goals.” “With more water-related special uses than any other national forest, the GMUG serves as critical headwaters. Protecting and sustaining these watersheds provides a high-quality, local source of 1.9 million acre-feet of water that is consumed by the population of western Colorado and the southwestern part of the United States and sustains the region’s ecosystems and wildlife habitat.”⁸⁷ Rivers and watersheds in the GMUG, while generally high quality, are still at risk for “ecosystem stressors, including dams and diversions, roads, mining, invasive species, disease, and climate change.”⁸⁸

The Forest Service should adopt Alternative D in the Plan and not allow timber production near any eligible wild and scenic rivers, to best protect these valuable riparian areas and assure their availability for future designation. Alternatives B and C in the Plan do not reflect a managerial approach that prioritizes the health of wild and scenic rivers and their ecosystems. Only eligible rivers classified as “wild” in both of these alternatives would be exempt from commercial logging and timber production.⁸⁹ Eligible wild and scenic rivers classified as “scenic” and “recreational” would be available for commercial timber production. In Alternative D, all eligible wild and scenic rivers, regardless of their classification, would be protected from all timber production activity. While some timber activity is necessary for trail maintenance, it is unclear how allowing timber production at a commercial scale on rivers

⁸⁶ <https://www.nrs.fs.fed.us/fmg/nfmg/docs/mn/Riparian.pdf>

⁸⁷ Draft Plan p. 8

⁸⁸ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd575500.pdf

⁸⁹ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd939809.pdf

classified as “scenic” and “recreational” will maintain the river “in its near natural environment” in accordance with the act. This policy seems particularly harmful for the several segments with a “scenery” ORV, as commercial timber production would most likely harm the scenic quality of these segments and have a direct and adverse effect on the value for which these segments were deemed eligible.

The effects of timber production on riparian areas are well documented. Timber production and deforestation can alter habitat, causing channel narrowing and compromising in-stream processing of pollutants.⁹⁰ Removing riparian forest can also increase stream temperature, negatively impacting trout species which require cooler waters.⁹¹ Furthermore, commercial logging operations typically involve a network of roads,⁹² which can serve as a “long-term source of fine sediment input into water bodies.”⁹³ The draft EIS also states that timber production “could result in more short-term impacts to scenic character and recreational access, would alter the vegetation structure, and would change existing wildlife habitat.”⁹⁴

Considering the Act’s anti-degradation principle “that pollution should be reduced and eliminated on designated rivers,” it is unclear how Alternatives B and C could achieve this goal.⁹⁵ Allowing timber production places wild and scenic rivers and their riparian areas at risk for ecosystem stressors. As management cannot affect the eligibility or classification of any river, allowing timber production seems impractical to preserve wild and scenic rivers. While the draft EIS states that “[p]olicies would provide protection for river flow characteristics and water

⁹⁰ <https://www.pnas.org/content/101/39/14132>

⁹¹ [A Review of the Efficiency of Buffer Strips for the Maintenance and Enhancement of Riparian Ecosystems](#)

⁹² https://www.gmugrevision.com/wp-content/uploads/2019/03/Gunnison_County_Wetlands.pdf

⁹³ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd575500.pdf

⁹⁴ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd939809.pdf

⁹⁵ <https://www.mdpi.com/2071-1050/13/4/1878/htm>

quality” for the designated segments, it further acknowledges that “the reduction of suitable timber base due to an increase in the acreage of recommended wilderness would result in reduced watershed impacts from timber harvest.”⁹⁶

Stewardship of wild and scenic rivers is consistent with the Forest Service’s mission of securing favorable conditions of water flows. Further, the Forest Service has acknowledged the importance of riparian areas in maintaining biodiversity and in the overall health of the ecosystem.⁹⁷ The draft EIS states that “alternatives that limit disturbances or focus protection on key watershed components such as wetlands and riparian vegetation will most successfully function under a variety of climate scenarios” and identifies Alternative D as the best option to meet this goal.⁹⁸ Alternative D would further “have the fewest cumulative watershed resource impacts,”⁹⁹ whereas Alternatives B and C would have greater negative impacts.¹⁰⁰ Therefore, with the greatest amount of recommended wilderness and greatest protections for wild and scenic rivers, Alternative D would have the most beneficial impacts and should be adopted.

V. Conclusion

Thank you for this opportunity to submit comments on the GMUG Draft Land Management Plan. We commend the agency’s work creating this new plan, and hope the Forest Service adopts Alternative D in the plan’s final version.

⁹⁶ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd939809.pdf

⁹⁷ https://www.fs.fed.us/rm/pubs_journals/2017/rmrs_2017_rothlisberger_j001.pdf

⁹⁸ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd939809.pdf

⁹⁹ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd939809.pdf

¹⁰⁰ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd939809.pdf

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