



**Sheep  
Mountain  
Alliance**

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November 25, 2021

Grand Mesa, Uncompahgre, and Gunnison National Forests  
Attn: Chad Stewart Forest Supervisor and Plan Revision Team  
2250 Highway 50  
Delta, CO 81416

Submitted online via: email and comment form at <https://cara.ecosystemmanagement.org/Public/CommentInput?Project=51806>

Dear GMUG Planning Team,

Please accept the following comments on the GMUG's Draft Plan and Draft Environmental Impact Statement on behalf of Sheep Mountain Alliance and our more than 700 members and supporters. Our members use the national forest in many varied ways. They are hikers, hunters, anglers, bikers, horseback riders, foragers, photographers, climbers, boaters, guides, business owners, and ranchers. They rely on the GMUG national forest to support their livelihoods, provide opportunities for solitude and recreation, and to support their health and wellness through a wide range of ecosystem services.

We appreciate the tremendous amount of effort and resources this planning process has required of the Forest Service to date. We are glad that the GMUG has remained committed to public outreach and has held public workshops and opportunities for comment along the way. We particularly appreciate the GMUG's willingness to meet with groups like us to discuss issues of concern and provide more detailed information about how certain assessments and decisions were made.

We support the November 24th, 2021 comments submitted by High Country Conservation Advocates (HCCA) et. al., to which we are signatories, as well as the Town of Ophir's 2021 comments. Since many of our concerns as an organization are addressed in depth within the HCCA et. al. comments, we will simply say here that we have profound concerns about the limited amount of wilderness being considered for management designation in Alternative B, as well as the vast overestimates of suitable timber acreage across the forest throughout all alternatives.

We generally support alternative D for its emphasis on conservation of the landscapes we all rely on, but even this alternative needs to be revised in order to provide better ecosystem and habitat protection by reducing the amount of so-called suitable timber across the forest. The significant increase in suitable timber in this draft plan could interfere with responsible future management of the forests that allows uses other than timber production, while opening up the backcountry through logging roads. Meanwhile, broadly designating vast swathes of the forest to be “suitable timber” impedes the prioritization of wildfire mitigation to protect critical infrastructure, including watersheds. It is worth noting that wildfire mitigation can happen outside of timber suitability areas as needed. Despite the GMUG’s current interpretation of the 2012 planning rule, the Forest Service is not in fact required to analyze slopes over 40%. That latitude has been demonstrated in the difference in timber suitability between Alternative B and D. Slopes over 40%, where it has not yet been shown that these slopes can be economically and ecologically harvested, should be eliminated from suitable timber through all alternatives.

Other general concerns for us include whether or not there was robust and meaningful tribal consultation; considerations to provide equitable access to historically marginalized communities on the GMUG; and the lack of integration of socioeconomic benefits analysis outside of the timber industry. We would like to see the integration of climate change mitigation and adaptation throughout all components of the plan, including calculating the carbon sequestration and water storage benefits of standing timber and intact ecosystems. While we support the Wildlife Management Areas listed in Alternative B, it is concerning to us that the GMUG only adopted approximately 50% of the areas proposed by CPW. In addition, the Species of Conservation Concern (SCC) listed did not include all species on the GMUG that require greater conservation focus. In particular, bighorn sheep MUST be considered, as in many places on the GMUG their populations are extremely vulnerable to disease transmission due to proximate domestic sheep grazing allotments. Other species that should have been included are purple martin, black swift, northern leopard frog, American marten, northern goshawk, boreal owl, Lewis’s woodpecker, flammulated owl, several species of potentially imperiled bats, ptarmigan, western bumblebee, House’s sandwort, reindeer lichen, Colorado Divide whitlow-grass, and Tundra buttercup, amongst others. Finally, we are very concerned about the insufficiency of the fen analysis in the draft Forest Plan. These are groundwater-dependent systems, not riparian zones, as they are described in the plan. The current inventory needs to be reworked, as it is currently missing many existing fens.

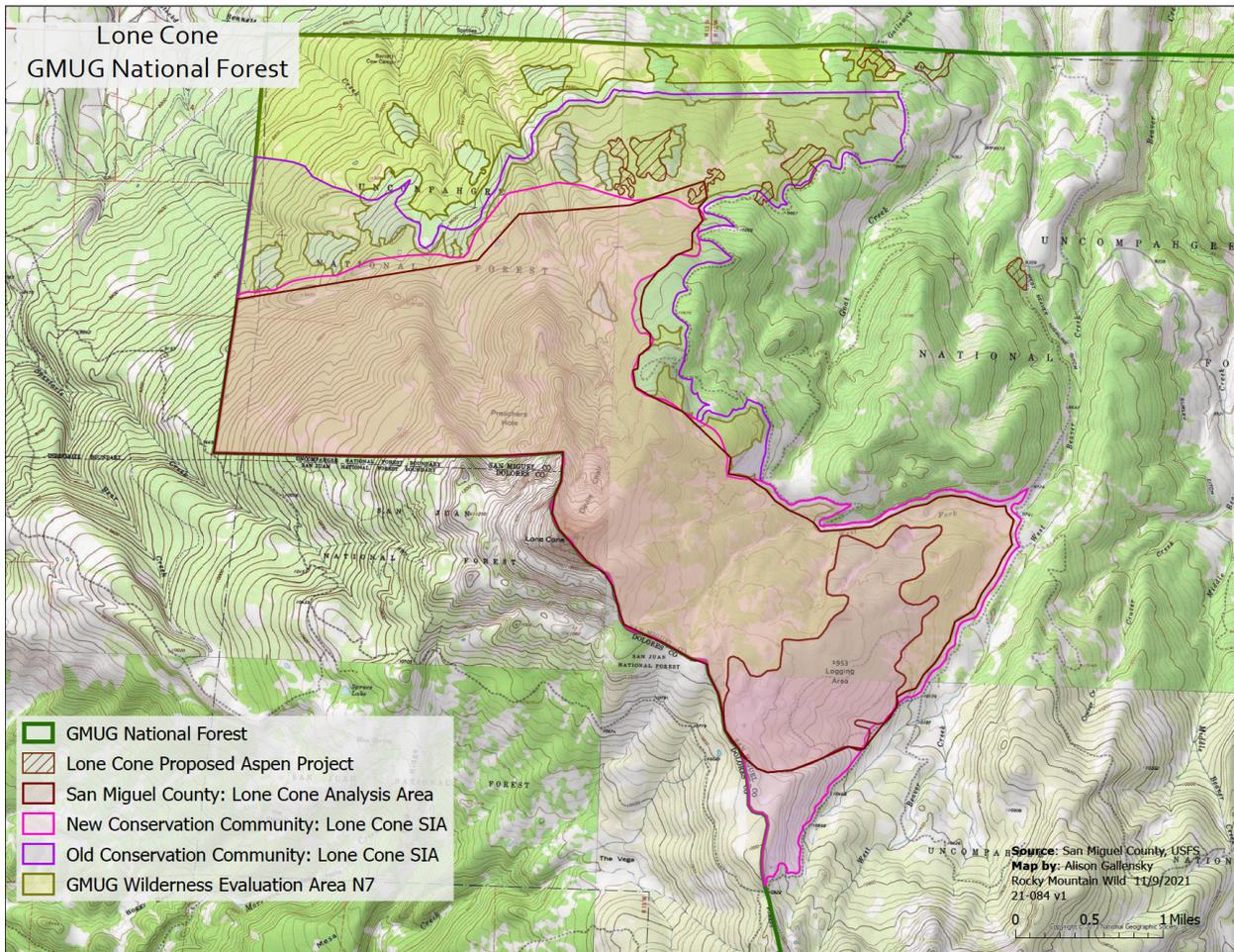
Provided below are some specific comments pertaining to wilderness, special management, recreation, and wild and scenic suitability.

### **Wilderness Inventory and Special Management Designations**

Sheep Mountain Alliance has been an active participant and contributor to the Community Conservation proposal, available online at [www.gmugrevision.com](http://www.gmugrevision.com). We support the entirety of the recommendations put forth in the proposal, with some small modifications at the local level.

In 2018 San Miguel County described a 5000 acre parcel surrounding Lone Cone as having a high level of wilderness characteristics. This did not make it into alternative D as recommended

wilderness, despite the GMUG's insistence on prioritizing county comment. Instead, what was included was the Community Conservation proposal area that had described a slightly larger area (around 7000 acres) and asked that it be considered for a lower level of Special Management designation. The entire Lone Cone Area contains significant wilderness characteristics (these are extensively described in the San Miguel County comments dated 10.9.2018) and has also been noted to have important wildlife habitat. San Miguel County's 2018 findings were that the smaller, undiluted area they proposed should be not just a special management area, but a potential wilderness. For these reasons, as well as the detailed descriptions we provided in our conservation community comments starting in 2017, we believe that a revised Lone Cone area should be analyzed for wilderness management at this stage of the Forest planning process. The Community Conservation proposal is currently being edited to reflect a portion of San Miguel County-proposed boundaries. In accordance with the findings of wilderness characteristics it is clear that in the absence of a scientifically-based reason to eliminate it, this area should be managed in a manner that would maintain these characteristics going forward. We ask that you include the area mapped below as the Lone Cone Proposed Wilderness Area. The relevant shapefiles are attached in our email comments.



The new Lone Cone proposed Wilderness\* Area is mapped in pink above. (\*The legend mistakenly calls an SIA). It is mapped here in comparison with the previously proposed SIA.

Alternative D includes East Beaver Creek for a proposed Wilderness addition. We support the management of this area with the original boundaries proposed in the Community Conservation Proposal for maintenance of its wilderness characteristics, which gave it one of the highest ratings of wilderness quality across the GMUG during the wilderness inventory stage. For this reason, as well as the many which we described in our initial proposal, the East Beaver Creek is worthy of consideration for eventual wilderness designation, and it is critical that its wilderness attributes be protected.

Finally, the areas within the GMUG that are part of the Colorado Outdoor Recreation and Economy Act have gone through an extensive public stakeholder process over the last decade that has honed their boundaries and eliminated multiple user conflicts. They should be incorporated in their entirety, including Special Management Areas around the Liberty Bell and Sheep Mountain Areas, into Alternative B.

### **Recreation Opportunity Spectrum**

#### Lone Cone and East Beaver Creek

As we noted in our last round of comments, the winter ROS in some specific areas of the GMUG is in need of extensive modification. In the area near Lone Cone and East Beaver Creek on the Norwood Ranger District of the Forest in Alternative B the Roded Natural ROS appears to be buffered out very far from the existing road, which does not reflect actual or possible conditions on the ground. This ROS is then bounded on two sides by a semiprimitive motorized ROS on Lone Cone that covers the entire area up to the summit, as well as to the East by a semiprimitive motorized ROS that goes up the steep, forested slopes of the East Beaver Creek area up to the existing Lizard Head Wilderness boundary. These ROS settings are not only unrealistic, but unsafe and unsuitable for these areas. Not only should no OSV be accessing these steep slopes, as they would be endangering themselves and any other backcountry users (Lone Cone is a backcountry ski destination that is growing in popularity), but both of the areas have been recognized as Wildlife Management Areas, critical for big game and other habitat. While big game have historically moved to lower elevation areas during the winter, changing climatic conditions have also been changing migratory patterns, and any additional stressors placed on animals in the area during the winter would only contribute to the already worrisome decline in elk and deer populations in Southwest Colorado. In addition, the Colorado Natural Heritage Program has recognized both areas for their habitat attributes-- namely lynx habitat and sensitive fens--that could be impacted by OSV use in the winter and OHV use in the summer.

We commend the Forest Service for creating the Wildlife Management area designations offered in Alternative B for this zone, but we strongly believe that both the East Beaver Creek and the Lone Cone area are uniquely wild, highly scenic locations with wilderness characteristics that must be protected at a higher level. Therefore, the summer ROS settings in Alternative B are also problematic in that the semi-primitive motorized ROS is buffered very far off of the road in the Lone Cone area. We are pleased to see part of these designations reflected in Alternative D, but the entire Lone Cone area (within the boundaries highlighted in

our above comments) should be designated “Primitive” for summer and winter ROS, as should the East Beaver Creek area. In addition to the habitat reasons highlighted above, we believe that this spectacular zone of the GMUG National Forest could see rapid development with increased user numbers over the next few years that would severely degrade the quality of the existing critical habitat recognized by CPW if not carefully managed and protected. Water resources for the residents and agricultural users of Wright’s Mesa are also dependent on the integrity of this zone, and we believe that proposed timber projects must carefully consider downstream impacts as they move forward. Finally, this is a particularly wild and unique part of the state--one of the last remaining areas where quiet users can truly feel like they are “out there” in a spectacular setting of some of the westernmost peaks in Colorado. Quiet users on the small patches of land that could be put off-limits to motorized use would provide a much-needed boost to the local economy, as visitors might come from far away to visit this landscape if its wilderness values are protected.

We have been in conversation with members of a local trails planning group based out of Norwood who are looking at possible expansion of motorized singletrack trails in the area. Their proposal will be dependent on the travel management decisions that the GMUG reaches. However, we have also found that there is no evident conflict between the Community Conservation Proposal and their plans. There are ample routes on roads and in the road corridor to provide for their future project developments.

### Ophir ROS

The Town of Ophir has expressed its concerns to us as well as to the Forest Service over the winter ROS designation at the West End of Ophir Valley leading up to Ophir Pass. In both Alternatives B and D, the road corridor is given a roaded natural ROS setting and the areas surrounding it are designated semi-primitive motorized. Ophir has repeatedly asked to have these settings changed to semi-primitive non-motorized, due to their very real concerns about avalanche hazards, backcountry safety, and potential impacts to lynx, which have been sighted in the area. We ask you to heed these concerns and change the designation for the entire West side of the Ophir valley to semi-primitive non-motorized.

## **Wild and Scenic**

### Fall Creek and Muddy Creeks

Thank you for finding Fall and Muddy Creek eligible as “wild” with Fish ORVs. However, we ask that in addition, the GMUG recognize these rivers for their Scenic, Geologic and Botanical ORV’s in order to guide future management practices.

### Tabeguache Creek and tributary North Fork of Tabeguache Creek

Thank you for finding Tabeguache and the North Fork of Tabeguache Creek eligible as “wild” with Scenery ORVs. However, we request that further Wildlife, Geologic and Botanical ORV’s be expressed in the GMUG plan as well.

### San Miguel Segments N5 and N6

Thankyou for finding segments N5 and N6 of the San Miguel and its tributaries eligible as “wild and recreational.” We firmly agree with the finding that the San Miguel has Recreational, Wildlife and Paleontological ORV’s and request that its Botanical and Heritage ORV’s be reconsidered. We additionally ask that the Keystone Gorge section of San Miguel be recognized as “wild” (free-flowing), and recreationally and scenically significant.

Bridal Veil and Ingram Falls

Bridal Veil and Ingram Falls had been considered by the Forest Service in the past to be eligible segments, but were dropped without explanation in this draft. The two small falls segments of Bridal Veil Creek and Ingram Creek are free-flowing, and have wildlife and historical values. The scenery of both these locations are undeniably spectacular, qualifying both falls for a Scenic ORV. Both areas are also significant recreation areas, which means they should be recognized as having a Recreation ORV as they did in the past.

To the entire Forest Planning team: Thank you for your hard work and continued effort. We appreciate your consideration of Sheep Mountain Alliance’s comments on behalf of our organization, staff, and members.

Regards,

Karen Tuddenham  
Executive Director  
Sheep Mountain Alliance