

September 14, 2022

Levi Broyles, District Ranger
Paonia Ranger District
Grand Mesa Uncompahgre and Gunnison National Forests
PO Box 1030
Paonia, CO 81428
Submitted via <https://www.fs.usda.gov/project/?project=62711>

RE: Paonia Winter Wildlife Habitat Improvement Project

Dear Levi,

Thank you for the opportunity to comment on the proposed Paonia Winter Wildlife Habitat Improve Project (“PWWHIP” or the “Project”). These comments are submitted on behalf of High Country Conservation Advocates, Wilderness Workshop, and Western Slope Conservation Center. Our organizations and members have longstanding interests in areas that would be treated by the Project, including Mt. Lamborn and Landsend Peak, Cathedral Peak, Buckhorn Gulch, and McClure Pass.

High Country Conservation Advocates (HCCA) is located in Crested Butte, Colorado and has over 900 members. HCCA was founded in 1977 to protect the health and natural beauty of the land, rivers, and wildlife in and around Gunnison County now and for future generations.

Wilderness Workshop (WW) is based in Carbondale, Colorado and has approximately 700 members. WW was founded in 1967 with a mission to protect and conserve the wilderness and natural landscapes of local public lands. WW has long engaged in management of public lands within the Grand Mesa, Uncompahgre, and Gunnison National Forests.

The Western Slope Conservation Center (WSCC) is a 45-year-old grassroots organization based in Western Colorado. Our membership base now represents over 600 individuals, primarily in Delta County, but with representation throughout Colorado and a few countrywide. We began in 1977 when neighbors joined to stop coal mines from dumping tailings near the North Fork of the Gunnison River. Over the years, our work has expanded to meet the more varied needs of our rural communities surrounded by public lands. Today our program areas are centered on Wild Lands and Water Advocacy, Watershed Stewardship, and Community Building.

Below we raise a number of important issues related to the proposed Project. We look forward to additional opportunities to provide comment as the Forest Service develops this proposal and analyzes and discloses the potential impacts it will have on important public land values.

1. The Forest Service Must Not Foreclose Its Discretion in the GMUG Forest Plan Revision.

The Forest Plan for the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) is under revision, and the agency is currently considering alternative approaches to future management of lands that are subject to the PWWHIP. The agency is also now reviewing proposals and comments submitted by the public that may inform how these lands are managed moving forward. Values our members and organizations would like to see protected under a new Forest Plan are discussed in more detail below. As a primary matter, though, the Forest Service should avoid approving any activities that would foreclose management options currently under consideration in the Forest Plan revision.

2. The Forest Service Must Undertake a Thorough NEPA Process.

The National Environmental Policy Act (NEPA) requires all federal agencies to take a “hard look” at the environmental consequences of proposed federal actions.¹ In doing so, an agency must identify and disclose to the public the impacts of a proposed action on the environment.² If an action “may” have a significant impact on the environment, NEPA requires the agency to prepare an environmental impact statement (EIS).³ Where the impacts of a project are not significant, or the agency is uncertain about their significance, it can prepare a shorter analysis called an environmental assessment (EA).⁴

In taking the “hard look” at impacts that NEPA requires, an EA must “study, develop, and describe” reasonable alternatives to the proposed action.⁵ The Tenth Circuit explains that this mandate extends to EAs as well as EISs: “A properly-drafted EA must include a discussion of appropriate alternatives to the proposed project.”⁶ This alternatives analysis “is at the heart of the NEPA process, and is ‘operative even if the agency finds no significant environmental impact.’”⁷ Reasonable alternatives must be analyzed for an EA even where a FONSI is issued because “nonsignificant impact does not equal no impact. Thus, if an even less harmful alternative is feasible, it ought to be considered.”⁸ When an agency considers reasonable alternatives, it “ensures that it has considered all possible approaches to, and potential environmental impacts of, a particular project; as a result, NEPA ensures that the most intelligent, optimally beneficial decision will ultimately be made.”⁹

Here, the Forest Service is proposing to treat more than 25,000 acres over a ten-year period in areas with sensitive environmental values. The agency must take a hard look at potential impacts and consider

¹ 42 U.S.C. § 4332(C)(i)-(ii).

² 40 C.F.R. § 1502.1.

³ 40 C.F.R. § 1508.18; 42 U.S.C. § 4332(2)(C).

⁴ 40 C.F.R. §§ 1501.3, 1508.9.

⁵ 42 U.S.C. § 4332(2)(C) & (E); 40 C.F.R. § 1508.9(b) (an EA “[s]hall include brief discussions ... of alternatives”).

⁶ *Davis v. Mineta*, 302 F.3d 1104, 1120 (10th Cir. 2002) (granting injunction where EA failed to consider reasonable alternatives).

⁷ *Diné Citizens Against Ruining Our Env’t v. Klein*, 747 F. Supp. 2d 1234, 1254 (D. Colo. 2010) (quoting *Greater Yellowstone Coal. v. Flowers*, 359 F.3d 1257, 1277 (10th Cir. 2004)). See also *W. Watersheds Project v. Abbey*, 719 F.3d 1035, 1050 (9th Cir. 2013) (in preparing EA, “an agency must still give full and meaningful consideration to all reasonable alternatives” (emphasis added) (internal quotation and citation omitted)); 40 C.F.R. § 1502.14 (describing alternatives analysis as the “heart of the environmental impact statement”).

⁸ *Ayers v. Espy*, 873 F. Supp. 455, 473 (D. Colo. 1994) (internal citation omitted).

⁹ *Wilderness Soc’y v. Wisely*, 524 F. Supp. 2d 1285, 1309 (D. Colo. 2007) (quotations & citation omitted).

reasonable alternatives as required by NEPA. Given the scale and duration of this proposed Project, a full EIS may be appropriate.

3. The Forest Service Must Analyze and Protect Wilderness Values.

PWWHIP overlaps with areas the Forest Service has inventoried for wilderness values and found wilderness characteristics exist.¹⁰ The agency must fully analyze potential impacts to those wilderness characteristics from the Project and disclose those impacts in its environmental analysis; consider alternatives to avoid, minimize, and mitigate impacts to wilderness characteristics; and ultimately ensure that wilderness values are protected under the Project decision.

Additionally, the Project area overlaps with areas that citizens have proposed for wilderness management at Coal Mountain and Mount Lamborn.¹¹ The Forest Service must address citizen wilderness recommendations in the NEPA process for this Project and consider alternatives to protect citizen-identified wilderness values from potential impacts. This is particularly important given that the agency is considering protective management for those areas in the ongoing Forest Plan revision, as proposed in public comments on the Draft Forest Plan. The Forest Service cannot foreclose its ability to make management decisions in the Final Forest Plan that would protect the wilderness values proposed for protective management by the public.

The Project proposes use of helicopters to manage treatment in areas where the Forest Service has inventoried wilderness character and identified by the public for wilderness designation. Generally, the use of any motor vehicles in wilderness is prohibited under The Wilderness Act.¹² Exceptions are allowed for “minimum requirements for the administration of the area for the purpose of this Act.”¹³ The primary purpose of The Wilderness Act is to retain areas showing minimal human impact, i. e., land that:

Retain[s] its primeval character and influence...which is protected and managed so as to preserve its natural conditions”¹⁴

Measures may also be taken to control fire, insects, and disease.¹⁵ It is also Forest Service policy to “Discourage flights over wilderness within 2,000 feet of the ground surface, except in emergencies or for essential military missions.”¹⁶

¹⁰ See <https://www.fs.usda.gov/detail/gmug/landmanagement/planning/?cid=fseprd570149>.

¹¹ See [Attachment 1](#); see also <https://www.bennet.senate.gov/public/index.cfm?p=gunnison-public-lands-proposal>.

¹² 16 U. S. C. 1133(4)(c).

¹³ *Ibid.*

¹⁴ 16 U. S. C. 1131.

¹⁵ *Id.* at 1133(d)(1).

¹⁶ FSM 2326.03 3.

Accordingly, we appreciate that the Forest Service is not including agency-recommended wilderness that is under consideration in the Draft Forest Plan in the Project area. The Forest Service must similarly exclude citizen-recommended wilderness from the Project area because Project elements are inconsistent with wilderness management.

4. The Forest Service Must Consider and Protect Citizen Proposed Special Management Areas.

PWWHIP overlaps several proposed Special Management Areas (SMAs) that are currently under consideration by the Forest Service as part of the GMUG Forest Plan revision process. These include the Lamborn Special Interest Area and the Muddy Country Watershed and Wildlife Conservation Area.¹⁷ Generally, the goal of these SMA proposals is to protect the wildland and wildlife values in these areas, and the goals of PWWHIP are complimentary to the SMA proposals. Importantly, though, commercial timber harvest would be incompatible with the SMA proposals.

The Forest Service must consider and disclose any potential impacts PWWHIP would have on proposed SMAs and on values outlined in the SMA proposals.

5. The Forest Service Must Consider and Protect Roadless Values.

The Project area for PWWHIP overlaps several inventoried Colorado Roadless Areas (CRAs). Tree cutting and road construction in CRAs are prohibited under the Colorado Roadless Rule.¹⁸ However, this Project may fit within an exception allowing for tree cutting to maintain or restore the characteristics of ecosystem composition, structure and processes.¹⁹ Regulations do make clear that utilization of this exception is “expected to be infrequent,” which compels some explanation since PWWHIP proposes treatment of thousands of acres every year for a decade.²⁰ Nonetheless, we support the Project’s commitment to no new road construction, and we ask for a firm commitment in any final decision confirming that there will be no new roads of any kind, temporary or permanent, constructed within any CRAs as part of the Project. We also support the absence of any commercial timber component.

Mount Lamborn CRA

In addition to ensuring the protection of CRAs and roadless values, the Forest Service’s analysis of this Project must consider and disclose potential impacts to CRAs. For example, the Mount Lamborn/Landsend Peak treatment unit overlaps with the Mount Lamborn CRA which retains numerous environmental values that must be considered, including:

The southern portion of this CRA is within The Nature Conservancy’s Little Coal Creek conservation site. Two Colorado Natural Heritage Program areas are present. The Upper

¹⁷ See Attachments 2 and 3.

¹⁸ 36 C.F.R. § 294.42(a).

¹⁹ Id. at § 294.42(c)(3).

²⁰ Id.

Smith Fork Drainage is in the south, and the South Fork of Beaver Reservoir Potential Conservation Area is in the north. This area is a major wintering area for elk and deer in mild to normal winters. It also serves as a major migration route from and to the West Elk Wilderness. Little Coal Creek provides a bear concentration area. Bear from all over the West Elk Wilderness move into Cow Creek in the fall to feed on the mast. This area is also used by turkey for summer range. Lynx habitat is mapped in the forested cover at higher elevations. Bald eagle winter range extends into this area from the Gunnison River drainage. The upper end of Second Creek has a historic population of Colorado River native cutthroat trout which has been designated as a brood trout population. The South Fork of Minnesota Creek has Colorado River native cutthroat trout occurrence. This CRA includes Sand Mountain, as site identified as a bighorn sheep transplant site due to its roadless characteristics and proximity to a county road that can provide winter access for sheep trapping.²¹

The Landsend Peak Potential Conservation Area (PCA) is located on the southeast slope of Landsend Peak. It is rated as B4-Moderate Biodiversity Significance for supporting a small population of adobe beardtongue (*Penstemon retrorsus*), a globally vulnerable species. The Little Coal Creek PCA is located in the southeast section of the unit and is rated B2-Very High Biodiversity Significance owing to an excellent example of the globally imperiled Rocky Mountain thistle (*Cirsium perplexans*). The site also includes good quality examples of two riparian forests, *Pseudotsuga menziesii*/*Cornus sericea* and *Populus tremuloides*/*Pteridium aquilinum*.

In addition, this area contains numerous wet meadows, seeps, springs, creeks, and reservoirs, all of which contribute to a dependable water supply for farms, ranches, and communities in the North Fork Valley. A number of springs in this area feed into Paonia's drinking water supply, and could be affected by the Project. There is a private inholding in the western section of the CRA where many springs are located and have been tapped with infrastructure. There is also motorized access to other springs and reservoirs within the area. Please include a map showing locations of springs and other water sources to ensure sedimentation and erosion don't affect water resources for the Town of Paonia.

Mendicant CRA

The Cathedral Peak treatment unit overlaps with the Mendicant CRA. Please ensure that the Project protects this area and considers potential impacts to the numerous environmental values identified there, including:

A portion of the Upper Smith Fork Drainage Potential Conservation Area extends into this area in the north. Black bear use the area for summer range with fall concentration occurring in Virginia Creek. Turkey, mule deer, and elk use the area for summer range. The upper part of North Dyer Creek is an elk calf nursery, which indicates that the area

²¹ USDA Forest Service, Rocky Mountain Region, *Profiles of Grand Mesa, Uncompahgre, and Gunnison National Forests Roadless Areas* (2008), at 37.

is also an elk calving ground in the lower aspen grooves. Lynx habitat is mapped in this area. Colorado River cutthroat trout occurs in South Smith Fork within this CRA. Doug Creek located in the watershed below the Mendicant CRA is designated native cutthroat water as it contains a conservation population of Colorado River cutthroat trout.²²

Huntsman Ridge CRA

The McClure Pass treatment unit overlaps with the Huntsman Ridge CRA. While the Project scoping notice proposes treating mountain shrub oak and pinyon/juniper communities, existing vegetation within the McClure Pass unit is dominated by aspen and aspen mixed with Englemann spruce forests. Gambel oak occurs at lower elevations and as understory under aspen as elevation increases. There should be no direct or incidental burning of aspen or spruce forest as part of this Project.

Please ensure that the Project protects this area and considers potential impacts to the numerous environmental values identified there, including:

This area is within The Nature Conservancy's McClure Pass conservation site. This area provides calving areas, summer range, and winter range for elk. Summer range for black bear, mountain lion, mule deer, turkey, and over all range for moose also exists here. Lynx habitat is mapped in this CRA, and the McClure Pass lynx linkage area includes part of this area. Colorado River cutthroat trout can be found in Roberts Creek. Sensitive species dependent on aspen habitats such as the Northern goshawk, flammulated owl, purple martin, and American marten have potential habitat in this area.²³

6. The Forest Service Must Provide Additional Information to Support Its Analysis and Decision.

Historic Range of Variability - Our groups generally support utilizing prescribed fire to restore fire dependent ecosystems that are outside the historic range of variability (HRV). Here, the Forest Service must provide information on the role that fire has traditionally played in areas that would be treated, as well as analysis detailing how long ago the treatment areas burned and how that relates to the HRV.

Fuel Reduction – With limited resources to expend, it is unclear why the Forest Service is focusing on fuel reduction projects far from communities. The agency must provide a compelling rationale to justify prioritizing fuel reduction work so far from people and valuable community infrastructure.

Stand Density - As one of the justifications for the Project, the scoping notice states: "Additionally, reduction in mature and over-mature oakbrush and pinyon/juniper would provide reduced fuels available for wildfires which could threaten municipal and irrigation water systems, adjacent non-National Forest System (NFS) lands, and conifer stands on the flanks of Mt. Lamborn and Landsend."

²² USDA Forest Service, Rocky Mountain Region, *Profiles of Grand Mesa, Uncompahgre, and Gunnison National Forests Roadless Areas* (2008), at 35.

²³ Id. at 28.

While we agree that fire can be used to manage Gambel oak densities and growth forms, large oaks should be maintained. Several tactics may enhance survival of large oaks during prescribed fire: keeping pine slash away from oak boles, avoiding lighting near oaks or reducing fire intensity near oaks, and raking fuels away from oak boles.²⁴

However:

Recurring fires often result in oak stands developing into large thickets; younger thickets created in this way can become exceptionally dense and almost impenetrable for livestock and wildlife. Older stands tend to form clumps with a lush understory of grass and forbs, often attaining tree-like form with heights up to 20 feet.”²⁵

[....]

Fire readily kills the above-ground portions of oak brush. However, intense sprouting follows almost immediately and usually causes the stands to become even denser. With prescribed burning, a commitment to repeated burning on the same site is necessary to effectively reduce the oak brush over the long term. However, prescribed fire also can be an effective tool to produce younger plants that are more palatable to wildlife.²⁶

Given the likelihood that the Project’s prescribed fire could turn mature oak stands into denser young stands, how does the Project provide a solution to address the issue of stand density and fuel loading?

Age-Class Diversity - Please provide for the public a map of the area showing the extent and age-class diversity of forest stands in and around the Project area. Reducing or eliminating a large amount of mature forest cover would be problematic if that constitutes the majority of this age-class in the area. Because Rocky Mountain Gambel Oak-Mixed Montane Shrubland is sparsely represented within existing wilderness both nationally and on the GMUG, please disclose why eliminating or reducing this forest cover in the backcountry is appropriate.

Old-growth – On April 22, 2022, the Biden Administration released Executive Order 14072: “Strengthening the Nation’s Forests, Communities and Local Economies.” Among a longer list of priorities, the order reiterates the Administration’s policy to “pursue science-based, sustainable forest and land management;” “conserve America’s mature and old growth forests on federal lands;” “invest in forest health and restoration;” and “deploy climate-smart forestry practices and other nature-based solutions to improve the resilience of our lands, waters, wildlife, and communities in the face of increasing disturbances and chronic stress arising from climate impacts.”²⁷

²⁴ See <https://www.fs.usda.gov/treearch/pubs/29458>.

²⁵ See <https://extension.colostate.edu/topic-areas/natural-resources/gambel-oak-management-6-311/> (emphasis added).

²⁶ Id. (emphasis added).

²⁷ See <https://www.fs.usda.gov/managing-land/old-growth-forests>.

The policy makes clear that protecting old-growth is a priority of the Forest Service. It requires the agency to define old growth and mature forests and to inventory old growth forests on federal lands. And while implementation of those policies agency-wide will take some time, the Forest Service should be working to inventory and protect old-growth at the project level in furtherance of the policy.

As part of this Project, the Forest Service should inventory proposed treatment units for old-growth. The agency should take a hard look at the potential impacts this Project would have on old-growth, and consider reasonable alternatives to protect old-growth in the Project area.

Impacts to Aspen – While the Project proposal says nothing about treating aspen, units in the Project area have extensive stands of aspen that may be impacted by proposed treatments. The McClure Pass unit, for example, is dominated by large aspen groves. The Forest Service must analyze and disclose potential impacts to aspen from the proposed action.

7. The Project Must Include Monitoring

We ask that the Forest Service and partners adopt a robust monitoring regime to analyze and assess the proposed Project's effectiveness. Specific aspects needed for monitoring, at a minimum, are:

1. Oak and pinyon/juniper regeneration;
2. Watersheds and soils, including connected and disturbed area and stream sediment;
3. Source waters, as a number of springs that feed into Paonia's drinking water could be affected;
4. Noxious weed introduction and spread;
5. Effectiveness of mitigation measures.

Monitoring is extremely important and must be part of the Project. Prior to treatments it is critical that baseline data (including photos) are taken to provide a barometer for comparing with post-treatment conditions. Control areas (areas not treated) should also be established to provide for comparison to treated areas.

Thank you for your consideration of our comments.

Matt Reed
Public Lands Director
High Country Conservation Advocates
PO Box 1066
Crested Butte, CO 81224
(970) 349-7104
matt@hccacb.org

Peter Hart, Attorney
Wilderness Workshop
P.O. Box 1442
Carbondale, CO 81623
Office: (970) 963-3977
peter@wildernessworkshop.org

Ben Katz
Public Lands Program Director
Western Slope Conservation Center
PO Box 1612
Paonia CO 81428
ben@theconservationcenter.org

Attachment 1

Coal Mountain Recommended Wilderness (West Elk Wilderness Addition)

Gunnison National Forest
Paonia Ranger District
15,200 acres



General Description

The Coal Mountain Recommended Wilderness encompasses the backside of Mount Lamborn near Paonia and Crawford, and incorporates the headwaters of several streams into the adjacent 176,412-acre West Elk Wilderness. Collectively, the roadless areas contiguous with the West Elk Wilderness amount to 125,000 acres and comprise the largest wilderness opportunity on the national forest system in Colorado. The 15,200 acres of Coal Mountain comprise the westernmost of these wilderness-adjacent roadless areas.

Coal Mountain contains extraordinary wildlife values that should be maintained by protecting the area's wilderness character and ensuring minimal conflicts between wildlife species and land users. The area is particularly notable as a wintering area for elk, and as a migration route for elk moving to and from the West Elk Wilderness. Bears concentrate in Little Coal Creek. Second Creek and the South Fork of Minnesota Creek were historically occupied by Colorado River cutthroat trout. Predominant ecosystem types include aspen woodlands and Gambel oak, both characteristic of lower elevations and lacking in representation within the existing Wilderness system.

The Recommended Wilderness is remote with four low-use trails crossing the area, and with no trailheads in immediate proximity to the area. Trail use and visitation is infrequent at any time of year due to ruggedness and weather conditions, with the highest visitation occurring during the fall hunting seasons. Inter Ocean Pass Trail #890 and Trail #894 are currently open to mechanized use, however, these trails see little to no current use from mountain bikers.

Naturalness

Coal Mountain has a great degree of naturalness. The area is rugged and not easily accessible. None of its forest is considered suitable for timber production and thus has not experienced historic entry for logging. Other impacts related to human use and development are substantially unnoticeable, and the area feels exceedingly natural.



Outstanding Opportunities for Solitude or Unconfined Primitive Recreation

Two of the primary drainages in the area, Second Creek and South Fork of Minnesota Creek, lack trails paralleling the creeks as is common elsewhere on the national forest. The absence of trail infrastructure and frequent dense aspen ensure outstanding opportunities for solitude and unconfined primitive recreation.

One trail cuts across the higher reaches of the roadless area, the Little Elk Basin. This trail contours across the headwaters of Second Creek from Little Coal Creek en route to the West Elk wilderness boundary. The trail draws hunters in fall who are challenged by the remote, backcountry hunting opportunities the area provides and by the area's abundance of wildlife. It also offers hikers, anglers and equestrians an out-of-way access route into the West Elk Wilderness.

Size and Roadlessness

The Coal Mountain Recommended Wilderness is 15,200 acres and is contiguous to the 176,412-acre West Elk Wilderness. There are no roads within the unit.

Supplemental Values

Coal Mountain includes portions of two Potential Conservation Areas (PCAs) identified by the Colorado Natural Heritage Program. The South Fork at Beaver Reservoir PCA is located along the riparian zone of the South Fork of Minnesota Creek, below Coal Mountain. The PCA supports a good example of a globally vulnerable narrowleaf cottonwood/alder riparian forest (*Populus angustifolia*/*Alnus incana* ssp. *tenuifolia*). It is rated by CNHP as possessing B3-High Biodiversity Significance because it provides a high quality example of a common but usually degraded community. Wilderness designation would guard against degrading management activities upstream of the riparian corridor.

The Little Coal Creek PCA is rated B2-Very High Biodiversity Significance owing to an excellent example of the globally imperiled Rocky Mountain thistle (*Cirsium perplexans*). The site also includes good quality examples of two riparian forests, *Pseudotsuga menziesii*/*Cornus sericea* and *Populus tremuloides*/*Pteridium aquilinum*.

A primary migration route for elk moving to and from the West Elk Wilderness overlays the Coal Mountain unit. Little Coal Creek is identified as a concentration area for black bear, along the western edge of the proposed wilderness addition. Colorado River cutthroat trout have historically occupied Second Creek and the South Fork of Minnesota Creek, though these populations are not presently considered conservation populations owing to genetic introgression.

Coal Mountain's aspen woodlands and Gambel oak shrublands would significantly enhance ecosystem representation within the National Wilderness Preservation System. The area includes several thousand acres of Rocky Mountain Aspen Forest and Woodland, an ecosystem type with less than 20% representation within wilderness on the forest. It also hosts several thousand acres

of Rocky Mountain Gambel Oak-Mixed Montane Shrubland, which is sparsely represented within existing wilderness and only exists at less than 5% representation on the forest.

Manageability

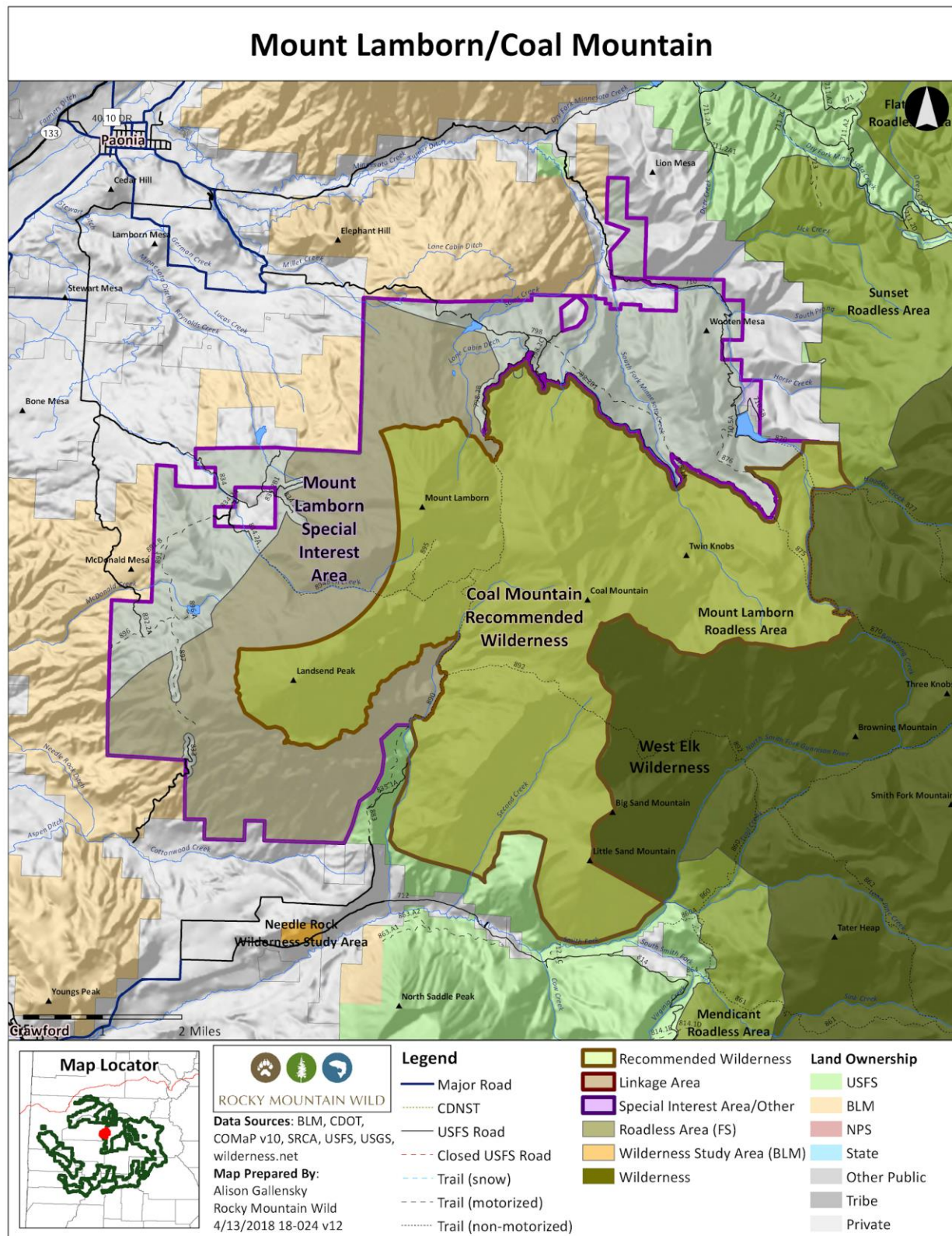
The Coal Mountain area is readily manageable as wilderness. The limited number of trails are non-motorized and lead directly into adjacent Wilderness. The Inter-Ocean Pass Trail forms the western boundary until it meets the upper-tier roadless boundary. We recommend limitations on mechanized use within this unit. The western boundary follows the upper-tier roadless boundary to the south until it meets the Little Coal Creek Trail, which forms the remaining western boundary, after which it follows the roadless area boundary to the south and east. The northern boundary excludes the Lone Cabin Ditch. The area has low potential for oil and gas resources, no likelihood of hardrock minerals, and is considered unsuitable for timber harvest.

If new management prescriptions or designations significantly limit existing mechanized recreation use or access, specifically in regard to mechanized use of Inter-Ocean Pass Trail (#890) as well as #894, then the Forest Service should consider reasonable mitigation of access impacts by identifying alternative routes more appropriate for ongoing and future mechanized use within relative proximity to the area. We are actively communicating with mechanized user groups and the local recreation community through an ongoing, and productive, process to address potential conflicts.

Historic and existing uses compatible with managing the area as Recommended Wilderness, including all grazing activities, should be allowed to continue by future management or designations.

Information Resources

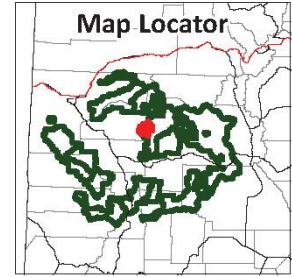
Item	Data Source
Roadlessness	Colorado Roadless Rule at 36 CFR part 294 et seq.
	Forest Service inventory pursuant to FSH 1909.12,chapter 70, section 71
Naturalness; Outstanding Opportunities for Solitude or Unconfined Primitive Recreation	Forest Service inventory pursuant to FSH 1909.12,chapter 70, section 72
	USDA Forest Service, R2, Profiles of Colorado Roadless Areas 2008
	GMUG Roadless Inventory & Evaluation for Potential Wilderness Areas, 2005
Supplemental Values	
Connectivity	SREP Wildlands Network 2003, USDA Forest Service Southern Rockies Lynx Amendment, 2008 Aplet et al, Indicators of Wildness 2000, Belote et al, Identifying Corridors among Large Protected Areas in the United States, 2016
Elk Severe Winter Range	Colorado Parks and Wildlife Species Activity Mapping 2017
Elk Winter Concentration Area	Colorado Parks and Wildlife Species Activity Mapping 2017
Gunnison Sage-grouse Historic Habitat	Colorado Parks and Wildlife Species Activity Mapping 2017
Lynx Potential Habitat	Colorado Parks and Wildlife Species Activity Mapping 2017
Little Coal Creek Potential Conservation Area with Very High Biodiversity Significance	Colorado Natural Heritage Program Potential Conservation Areas 2017
South Fork at Beaver Reservoir Potential Conservation Area with High Biodiversity Significance	Colorado Natural Heritage Program Potential Conservation Areas 2017
Land's End Peak Potential Conservation Area with Moderate Biodiversity Significance	Colorado Natural Heritage Program Potential Conservation Areas 2017
Second Creek Potential Conservation Area with Moderate Biodiversity Significance	Colorado Natural Heritage Program Potential Conservation Areas 2017
Occurrence of Colorado River Cutthroat Trout (<i>Oncorhynchus clarkii pleuriticus</i>)	Colorado Natural Heritage Program Element Occurrences 2017
Ecosystem Representation	TWS Ecosystem Representation 2016



Attachment 2

Lamborn Special Interest Area

Proposed Special Interest Area
Gunnison National Forest
Paonia Ranger District
14,100 acres



General Description

The Lamborn Special Interest Area (SIA) is located directly south-southeast of Paonia, east of Hotchkiss, and north of Crawford and contains a large portion of the Mount Lamborn Roadless Area. The remainder of this roadless area is adjacent to the proposed 15,200-acre Coal Mountain Recommended Wilderness Area, which is contiguous with the 176,412-acre West Elk Wilderness. BLM lands with high conservation and recreation values are contiguous with this special interest area to the north, northwest, and west.

This area is very diverse, ranging from about 6,300 feet to above 11,000 feet near the Mount Lamborn summit. Mount Lamborn and Landsend Peak to the south are the most prominent features near the eastern boundary of this unit. These mountains and the saddle and slopes between make up the majority of this unit's upper tier roadless area. Landsend Peak is the westernmost peak in the West Elk Mountains.

Vegetation in this area transitions from Gambel oak, serviceberry, and mountain mahogany shrublands to mixed aspen and spruce-fir forests at higher elevations, where large areas of snowberries can also be found. There are also many areas of exposed bare rock on the steep slopes of Mount Lamborn and Landsend Peak.



The proposed SIA contains many seeps, springs, creeks, and reservoirs. Many of the creeks' headwaters begin from the slopes of Mount Lamborn, including Sams Creek and Bells Creek. Reservoirs include Todd reservoir in the western portion of the unit and Lone Cabin Reservoir and Beaver Reservoir in the north-northeast section of the unit.

The wet meadows, springs, seeps, and reservoirs contribute to a dependable water supply for farms, ranches, and communities in the North Fork Valley. There is a private inholding in the western section of the unit where many springs are located and have been tapped with infrastructure. There is also motorized access to other springs and reservoirs within the unit.

The Lamborn SIA provides important wildlife habitat and migration areas due to the low-elevation meadows and riparian areas, which provide valuable connectivity for mule deer and elk herds between summer and winter ranges. This area also includes critical winter range for mule deer and winter range for elk.

Recreation Values

The Lamborn Special Interest Area is located in a large, mostly undeveloped roadless area. The dense vegetative cover, topographic variety, and untracked wild portions of the unit provide outstanding opportunities for solitude and respite. Despite its proximity to the town of Paonia, the area sees limited visitation at all times of year, with primary visitor use consisting of limited hunting and grazing access, along with motorized use along permitted corridors.

The Lamborn SIA also provides excellent opportunities for unconfined and primitive recreation, including hunting, fishing, hiking, biking, horseback riding, wildlife viewing, photography, hiking, and scenic viewing. The abundance of wildlife and habitat in this unit make this a highly-valued area for hunting; it is located within prized Game Management Unit 53.

This area contains several designated motorized routes for full-sized vehicles and motorized vehicles under 50 inches wide. These routes mostly serve to access reservoirs and springs; nevertheless, they provide opportunities for a variety of motorized recreation.

Biological Values

The Lamborn SIA includes portions of two Potential Conservation Areas (PCA) identified by the Colorado Natural Heritage Program. The Landsend Peak PCA is located on the southeast slope of Landsend Peak. It is rated as B4-Moderate Biodiversity Significance for supporting a small population of adobe beardtongue (*penstemon retrorsus*), a globally vulnerable species.

The Little Coal Creek PCA is located in the southeast section of the unit and is rated B2-Very High Biodiversity Significance owing to an excellent example of the globally imperiled Rocky Mountain thistle (*Cirsium perplexans*). The site also includes good quality examples of two riparian forests, *Pseudotsuga menziesii*/*Cornus sericea* and *Populus tremuloides*/*Pteridium aquilinum*. (CNHP PCA Report, 2015.)

The Lamborn area aspen woodlands and Gambel oak shrublands would significantly enhance ecosystem representation within the wilderness preservation system. The area includes several thousand acres of Rocky Mountain Aspen Forest and Woodland, an ecosystem type with less than 20% representation within wilderness on the forest. It also hosts several thousand acres of Rocky Mountain Gambel Oak-Mixed Montane Shrubland, which is sparsely represented within existing wilderness and exists at less than 5% representation on the forest. (TWS ecosystem representation report, 2016.)

This Lamborn area provides an important elk migration corridor in the lower elevation areas and into the mountains of the Coal Mountain Recommended Wilderness. The areas below Mount Lamborn and Landsend Peaks also provide elk winter range and concentration area from the West Elk Wilderness to the east. The low elevation area includes critical winter range for mule

deer. Potential lynx habitat is mapped for the forested cover at higher elevations. The steep rocky and rugged cliffs also make for great raptor habitat, including the bald eagle.

Boundary, Size and Access

The Lamborn Special Interest Area consists of 14,100 acres, and is adjacent to the west of the 15,200-acre Coal Mountain Recommended Wilderness, with which it shares the Mount Lamborn Roadless Area. The 125,000 West Elk Wilderness is contiguous with Coal Mountain to the east.

The eastern boundary of the unit, adjacent to the Coal Mountain Recommended Wilderness, is defined by motorized routes USFS 883, 835.1A, 890, 798.2B, and 798.2B1 as well as the upper-tier roadless boundary as it wraps around Landsend Peak and Mt. Lamborn. Private property borders the unit to the north, south, and portions to the west. The remainder of the unit boundary, to the north, northwest, and west is contiguous with valuable BLM lands.

This unit is easily accessible from Paonia via Minnesota Creek Rd (USFS 710), Lone Cabin Rd (USFS 798), and Bell Creek Rd (USFS 894). There are a few designated motorized routes that begin from these roads, most of which are for motorized vehicles under 50 inches in width. Most of the motorized routes are rough and rocky and require high-clearance four-wheel drive vehicles or all-terrain vehicles on Forest Service land.

Proposed Management

There are several designated motorized and mechanized routes that exist within the Lamborn Special Interest Area, as well as infrastructure for springs and reservoirs.

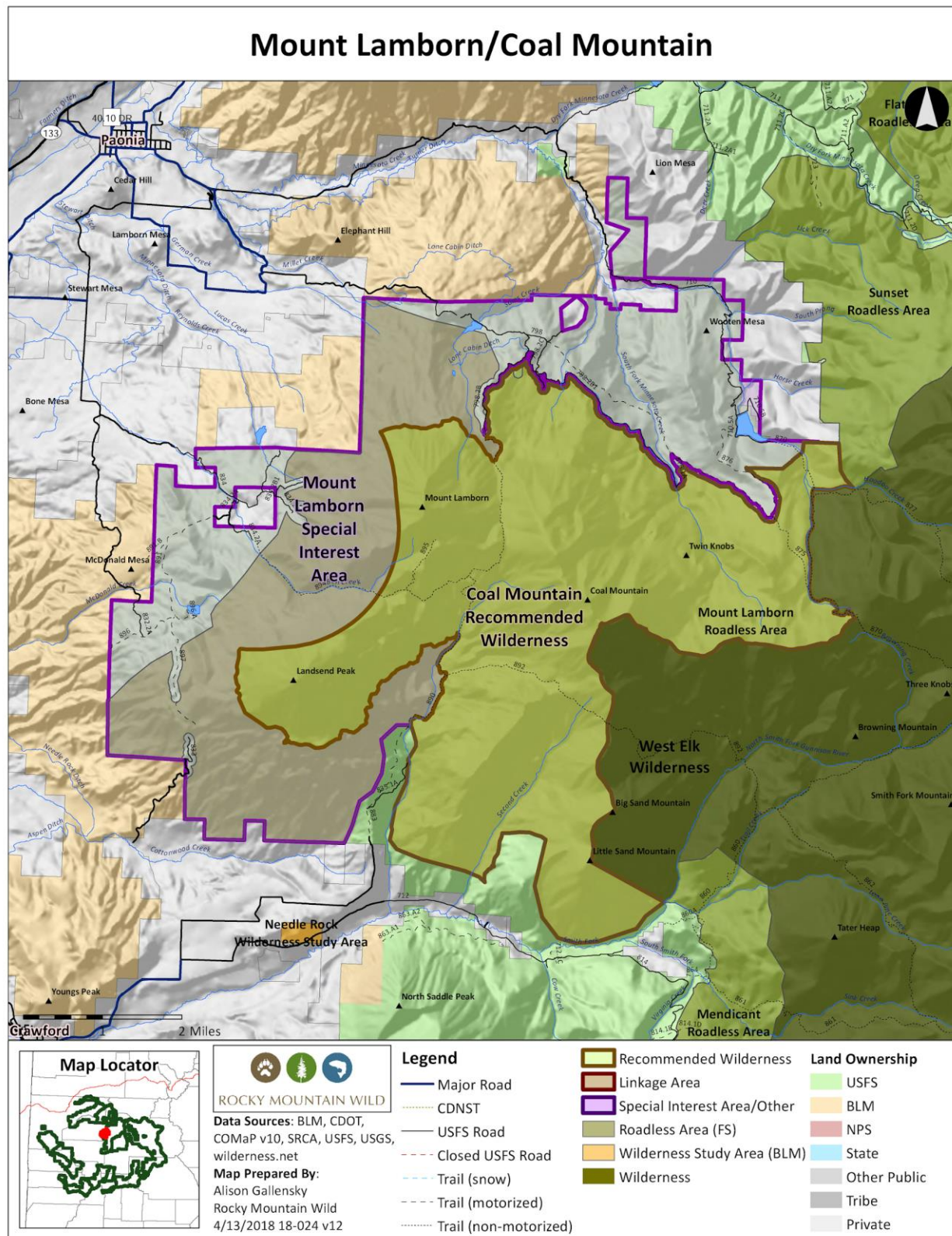
Recommended management direction includes:

- Lamborn SIA should be administratively closed to oil and gas leasing and mineral material sales, and a mineral withdrawal needs to be recommended for locatable minerals.
- Management direction should include a prohibition on timber harvest.
- The construction of new roads or motorized or mechanized trails within the area should be prohibited to emphasize primitive recreation opportunities, intact wildlife habitat, and the area's predominantly roadless character.
- Motorized and mechanized use should be limited to existing trails and currently allowable uses.
- Winter motorized use allowed.
- Historic and existing uses compatible with managing the SIA, including all grazing activities, should be allowed to continue.
- If new management prescriptions or designations significantly limit existing mechanized recreation use or access, then the Forest Service should consider reasonable mitigation of access impacts by identifying alternative routes more appropriate for ongoing and future mechanized use within relative proximity to the area. We are actively communicating with mechanized user groups and the local recreation community through an ongoing, and productive, process to address potential conflicts.

Information Resources

Item	Data Source
Roadlessness	Colorado Roadless Rule at 36 CFR part 294 et seq.
	Forest Service inventory pursuant to FSH 1909.12,chapter 70, section 71
Naturalness; Outstanding Opportunities for Solitude or Unconfined Primitive Recreation	Forest Service inventory pursuant to FSH 1909.12,chapter 70, section 72
	USDA Forest Service, R2, Profiles of Colorado Roadless Areas 2008
	GMUG Roadless Inventory & Evaluation for Potential Wilderness Areas, 2005
Supplemental Values	
Ecosystem representation	TWS Ecosystem Representation 2016
Wildlife	Colorado Parks and Wildlife All Species Activity mapping data, 2016

Map of Proposed Area



Attachment 3

Muddy Country Watershed and Wildlife Conservation Area



Proposed Special Management Designation
Gunnison National Forest
Paonia Ranger District
61,200 acres

General Description

The proposed Muddy Country Watershed and Wildlife Conservation Area (WWCA) encompasses 61,200 acres of National Forest land in the Muddy Creek headwaters. Muddy Creek is the northernmost major tributary of the North Fork of the Gunnison River, and conserving the water and wildlands of this area is vital to the health of the watershed.

The proposed WWCA is located north of Highway 133, which is a scenic byway, in the vicinity of McClure Pass. It is approximately 20 miles northeast of Paonia. Huntsman Ridge forms the eastern boundary, which is also the watershed boundary between the North Fork and Crystal Rivers and the administrative boundary between the White River and Gunnison National Forests.

The northern boundary largely tracks the forest boundary between the White River and Gunnison National Forests as well as the Muddy Divide, which separates the Muddy Creek and Divide Creek watersheds. The western and southwestern boundary tracks the same contours as the Mule Park Important Bird Area. Forest road 844.1A and the Forest Service boundary define the southern and southeastern extent of this proposed WWCA.

The proposed WWCA encompasses the U.S. Forest Service's Huntsman Ridge, Clear Fork, and Turner Creek Colorado Roadless Areas. It is adjacent to the Thompson Creek and East Willow Roadless Areas on the White River National Forest, as well as the Flattops/Elk Park Roadless Area on the GMUG National Forest. The WWCA is also a key part of the larger Thompson Divide landscape which encompasses 12 inventoried roadless areas. Thompson Divide represents one of the largest and least fragmented swaths of mid-elevation forest left in Colorado that has not been designated and protected as wilderness. The area has been proposed for withdrawal from future oil and gas leasing in Congress on several occasions due to broad-based public support for protecting the area's natural values, important wildlife habitat, traditional agriculture and backcountry recreation uses in the area. It provides connectivity between large swaths of National Forest on the Grand and Battlement Mesas and the mainstem of the Rocky Mountains. The proposed WWCA also overlaps with the Turner Creek Special Interest Area, proposed to the GMUG National Forest as part of the Community Conservation Proposal during the Forest Plan revision. And it overlaps with the proposed Mule Park Important Bird Area, which has been designated by the National Audubon Society. These proposals and designations show the extensive public support for protecting this area, and highlight the area's important natural values.

In addition to wildlife habitat and wildland values, the Muddy Creek watershed provides important water resources for agriculture production in the North Fork Valley. Muddy Creek is a major tributary to the Paonia Reservoir, which provides agriculture producers downstream with critical irrigation resources, as well as domestic water for the town of Somerset. Paonia Reservoir provides irrigation water to approximately 15,300 acres of land and has recreation and flood control benefits.

The proposed WWCA occupies elevations ranging from 11,786' atop Huntsman Mountain to around 7,600' where private lands border the National Forest in the valley bottoms. Huntsman Ridge is a prominent feature in the landscape with remarkable scenery, and is visible from miles around. The WWCA encompasses the Ridge and the Muddy Divide, as well as the varied forestland and multiple drainages flowing downhill, generally south and east, from the ridgelines to private lands closer to the valley floor.



Biological Values

The proposed WWCA includes some of the largest stands of aspen in the world and it represents the heart of a complex of roadless areas that extends from Battlement Mesa to Carbondale, providing a unique expanse of critically important mid-elevation backcountry. State wildlife officials have recommended that the roadless lands in this WWCA be protected to prevent habitat fragmentation and disturbance. Sensitive wildlife species dependent on both aspen and high elevation conifer habitats rely on this area. It provides calving areas, summer range, and winter range for elk; summer range and fall concentration areas for black bear; and important habitat for mountain lion, mule deer, turkey, mountain goat, and moose. Lynx habitat is mapped throughout this area, and the McClure Pass lynx linkage area includes part of this area. Clear Fork Muddy Creek contains green lineage Colorado River cutthroat trout, one of only 28 known conservation populations on the GMUG. Colorado River cutthroat trout can be found in Roberts Creek, Clear Fork Muddy Creek, Second Creek, North Twin Creek, and South Twin Creek. Beavers are also active in the area.

Sensitive species dependent on aspen habitats such as the Northern goshawk, flammulated owl, purple martin, and American marten also have important habitat in this area. As mentioned above, the National Audubon Society has designated portions of the proposed WWCA and nearby lands as the Mule Park Important Bird Area due to the presence of purple martin nesting colonies.

Vegetation in the area is rich and diverse. The highest elevations on Huntsman Ridge are alpine environments. The forests descending from the ridge are dominated by aspen and aspen mixed with Englemann spruce. Gambel oak occurs at lower elevations and as understory in aspen groves as elevation increases. Vast fern forests are also prominent understory in the aspen groves. There are open parks scattered throughout the WWCA. Riparian habitat occurs along Roberts Creek and around the numerous ponds in the area.

Historical Resources/Uses

There are existing oil and gas leases in the WWCA, though there is strong support for closing the area to new leasing. The Huntsman, Deadhorse, West Turner, and Muddy sheep allotments are located within this area. The Bull Mountain Pipeline also crosses this area, separating the Clear Fork and Turner Creek roadless areas. The Forest Service previously found portions of the area tentatively suitable for producing timber for wood fiber production within this unit. Coal exploration occurred north of the unit between the 1950s-1980s, but has not occurred in the area in recent decades since a deadly accident shut down the Midcontinent mine in Redstone. Most surface mine facilities are located on private land within the White River National Forest, though there is some historic evidence of mine activity in the area—mostly in some state of decomposition.

Recreation Values

The Muddy Country WWCA is a large swath of rich mid-elevation habitat that provides phenomenal opportunities for solitude and unconfined recreation. The area maintains a high level of naturalness. It is increasingly hard to find areas like this WWCA in Colorado, because mid-elevation forests have largely been fragmented by development and/or altered by intensive recreational activity and human use.

Recreation uses in this area are traditional and include hiking, horse packing, camping, fishing, photography, and hunting. There is limited backcountry skiing off of Huntsman Ridge, and some snowmobile use in the winter. Hunting season is typically the busiest time of year in the area due to healthy game populations in the area. People come from all over the country to hunt the Muddy Country WWCA in the fall. The area falls within Game Management Unit 521.

Developed access into the WWCA is limited to a few trailheads, including the Drift Creek Trail (TR 815), the Clear Fork Trail (810), Rock Creek Trail (814), Jones Creek Trail (812), and Forest Service Trail 522.1A. These trails are generally quiet except during hunting season. There is a designated motorized trail located in the western half of the Turner Creek portion of the WWCA. Limited biking occurs on some of the trails, but the trails are primitive and undeveloped by contemporary standards. This area is not a destination for mountain bikers. Those who do venture into the area do so looking for a unique, primitive backcountry experience. Opportunities to see wildlife are a big motivation for visitors to the area.

Proposed Management

The Muddy Country WWCA is proposed for the purpose of protecting and enhancing values such as unfragmented wildlife habitat, solitude, and scenic integrity and to preserve socioeconomic opportunities that emphasize traditional agriculture, and backcountry and primitive recreation. The area is remote and there is limited motorized access. Opportunities for solitude abound within this landscape, and evidence of human development is inconspicuous where it exists. The setting provides solitude, unique scenery, and exceptional habitat for wildlife. Protecting these values should be the Forest Service's primary objective.

The WWCA encompasses wild country that provides exceptional wildlife habitat and increasingly rare opportunities for backcountry hunting and fishing, and other traditional forms of recreation, in a large and predominantly unfragmented swath of rich mid-elevation forest. While it has many of the attributes associated with wilderness, the existence of oil and gas leases and some motorized use (e.g., administrative use along the Bull Mountain Pipeline and limited trail use) likely make WWCA designation more appropriate for this area.

We recommend the following management approach for the Muddy Country WWCA in the Forest Plan:

Desired Conditions

- Management should emphasize sustaining wildlife populations and primitive backcountry recreation opportunities.
- Examples of primitive-type recreation activities to be emphasized include observing wildlife, hiking, backpacking, horseback riding, fishing, cross-country skiing, dispersed camping, enjoying nature, and big game hunting.
- Apparent naturalness reflects ecological conditions normally associated with the area without human intervention.
- Motorized access remains limited to protect high-value natural resources within the area, as well as to maintain the emphasis on backcountry and primitive recreation opportunities.

Standards

- The Muddy Country WWCA should be administratively unavailable for oil and gas leasing and mineral material sales. At a minimum, the Forest Plan should apply a No Surface Occupancy (NSO) stipulation to the full WWCA that is not subject to waiver, exception or modification.
- Timber harvest should be prohibited.
- The construction of new roads or motorized or mechanized trails within the area should be prohibited to emphasize primitive recreation opportunities, intact wildlife habitat, and the area's predominantly roadless character.
- Motorized and mechanized use should be limited to existing trails and currently allowable uses.
- The Forest Plan should recommend a mineral withdrawal for locatable minerals.
- The area should be managed to exclude or avoid new rights-of-way such as pipelines and transmission lines.

Information Resources

Item	Data Source
Roadlessness	Colorado Roadless Rule at 36 CFR part 294 et seq.
	Forest Service inventory pursuant to FSH 1909.12,chapter 70, section 71
Naturalness; Outstanding Opportunities for Solitude or Unconfined Primitive Recreation	Forest Service inventory pursuant to FSH 1909.12,chapter 70, section 72
	USDA Forest Service, R2, Profiles of Colorado Roadless Areas 2008
	GMUG Roadless Inventory & Evaluation for Potential Wilderness Areas, 2005
Supplemental Values	
Connectivity	SREP Wildlands Network 2003, USDA Forest Service Southern Rockies Lynx Amendment, 2008 Aplet et al, Indicators of Wildness 2000, Belote et al, Identifying Corridors among Large Protected Areas in the United States, 2016
Elk Production Area	Colorado Parks and Wildlife Species Activity Mapping 2017
Elk Winter Concentration Area	Colorado Parks and Wildlife Species Activity Mapping 2017
Lynx Potential Habitat	Colorado Parks and Wildlife Species Activity Mapping 2017
Moose Concentration Area	Colorado Parks and Wildlife Species Activity Mapping 2017
Moose Priority Habitat	Colorado Parks and Wildlife Species Activity Mapping 2017
Occurrence of Colorado River Cutthroat Trout (<i>Oncorhynchus clarkii pleuriticus</i>)	Colorado Parks and Wildlife Species Activity Mapping 2017
Boreal Toad Overall Range	Colorado Parks and Wildlife Species Activity Mapping 2017
Elk, black bear, mountain lion, and mule deer habitat	Colorado Parks and Wildlife Species Activity Mapping 2017
Water Resources	Bureau of Reclamation, Paonia Project, 2015

Map of Proposed Area

