

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

January 7, 2020

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

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

Dear Mr. Stewart and Ms. Staley,

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

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

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

---

<sup>1</sup> <https://www.gmugrevision.com/>

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

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

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

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

---

<sup>2</sup> 36 C.F.R. § 219.19.

<sup>3</sup> 36 C.F.R. § 219.7(d).

<sup>4</sup> Carson National Forest. Draft Land Management Plan. July 2019. Available online at: [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd631756.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd631756.pdf).

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

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

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

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

With sincere thanks,

Patrick Dooling, Executive Director  
Western Slope Conservation Center  
[patrick@theconservationcenter.org](mailto:patrick@theconservationcenter.org)  
(970) 527-5307

Peter Hart, Staff Attorney  
Wilderness Workshop  
[peter@wildernessworkshop.org](mailto:peter@wildernessworkshop.org)  
(970) 963-3977

Aaron Kindle, Sr. Manager, Western Sporting Campaigns  
National Wildlife Federation  
[kindlea@nwf.org](mailto:kindlea@nwf.org)  
(303) 868-2859

Daly Edmunds, Policy and Outreach Director  
Audubon Rockies  
[daly.edmunds@audubon.org](mailto:daly.edmunds@audubon.org)  
(970) 416-6931

Bruce Ackerman, President  
Black Canyon Audubon Society  
[BruceAckermanAUD@aol.com](mailto:BruceAckermanAUD@aol.com)  
(727) 858-5857

---

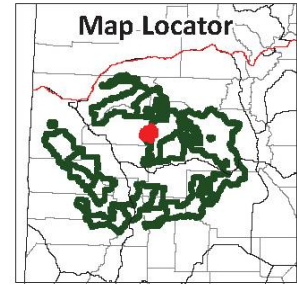
<sup>6</sup> U.S. Dept. of Agriculture, *Grand Mesa, Uncompahgre, and Gunnison National Forests Revised Draft Forest Assessments: Designated Areas*, 48 (March 2018).

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

## 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.

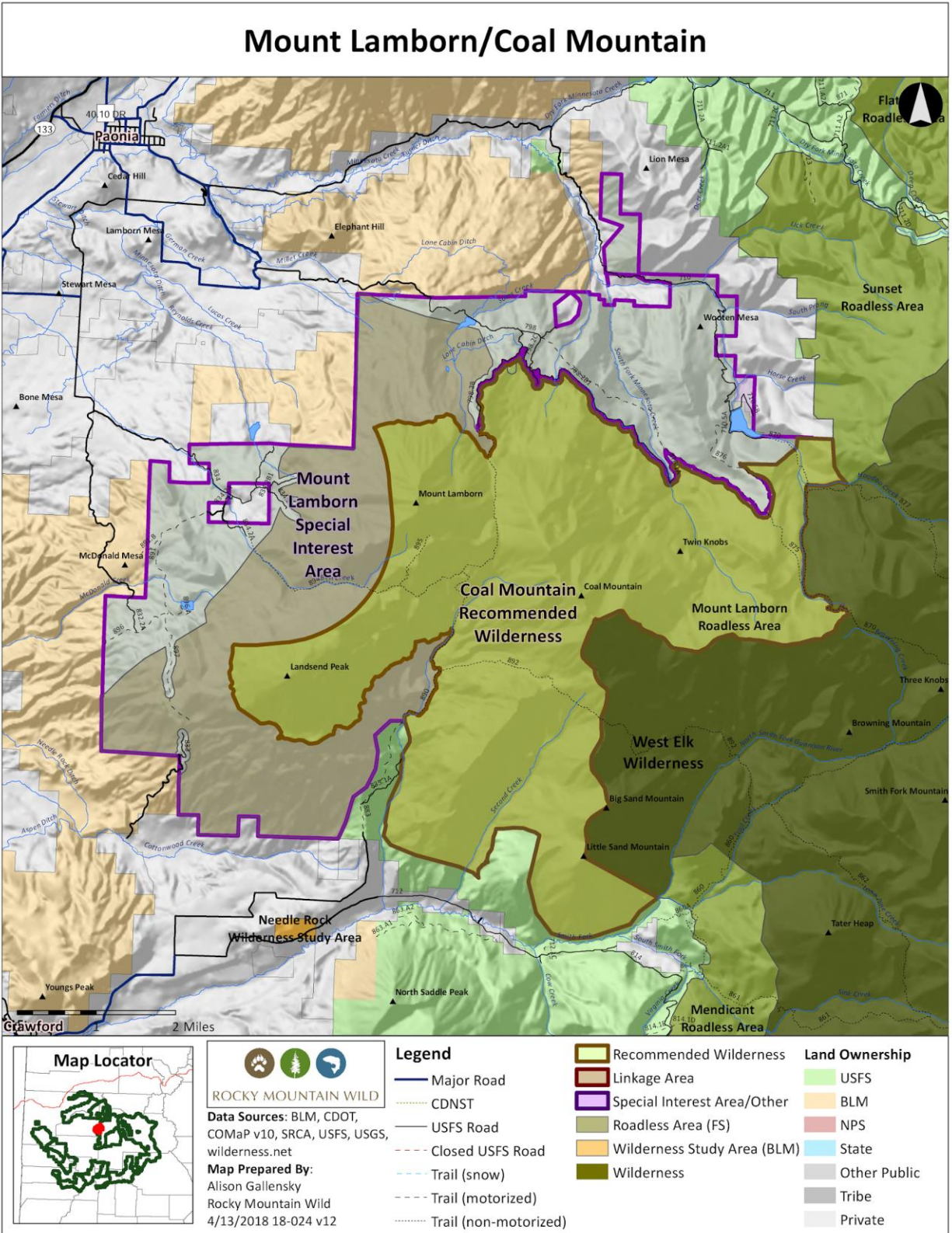
If new management prescriptions or designations significantly limit existing mechanized recreation use or access, specifically in regard to mechanized use of Inter-Ocean Pass Trail (#890) as well as #894, then the Forest Service should consider reasonable mitigation of access impacts by identifying alternative 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
<b>Roadlessness</b>	Colorado Roadless Rule at 36 CFR part 294 et seq.
	Forest Service inventory pursuant to FSH 1909.12,chapter 70, section 71
<b>Naturalness; Outstanding Opportunities for Solitude or Unconfined Primitive Recreation</b>	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
<b>Supplemental Values</b>	
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







# 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*

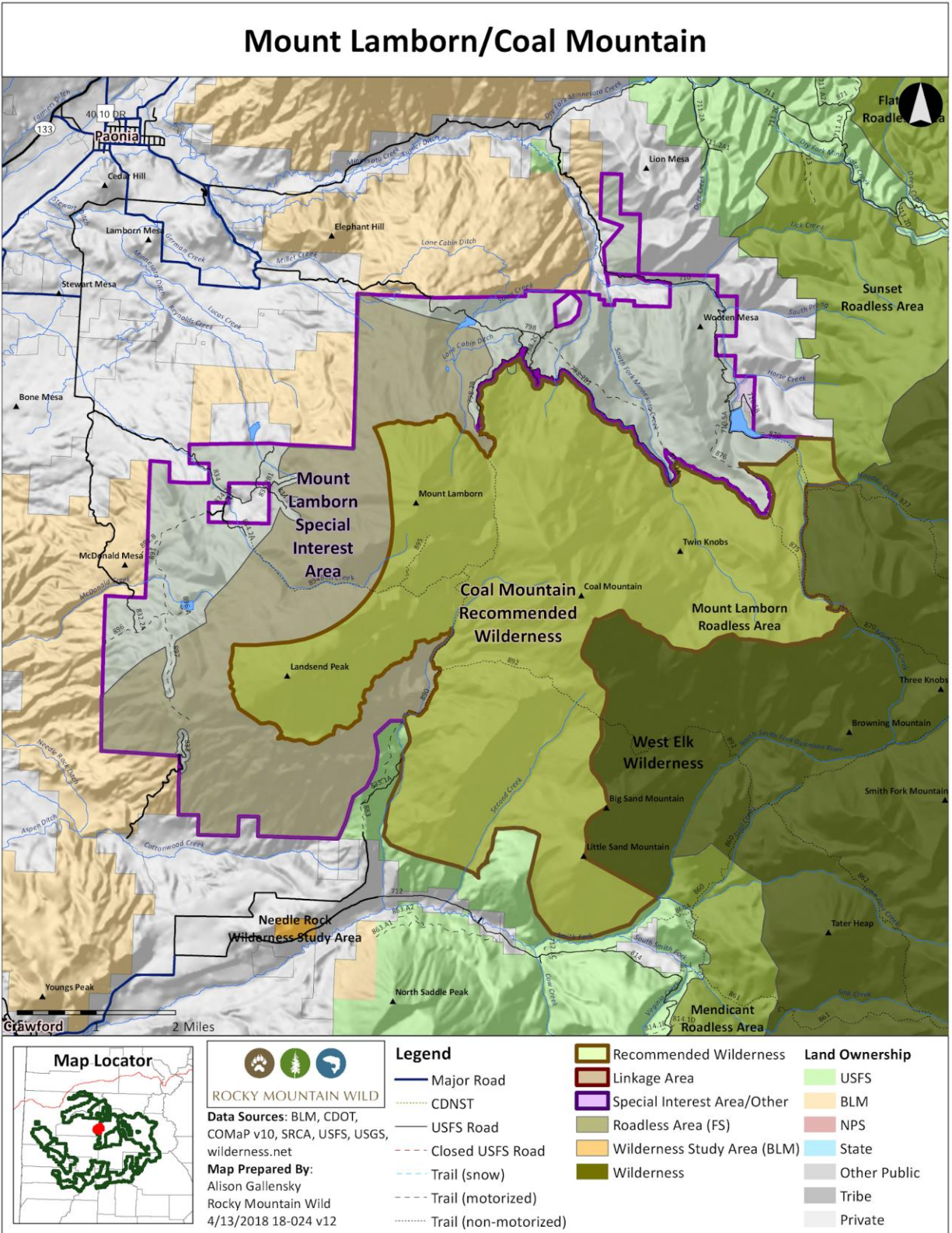
There are several designated motorized and mechanized routes that exist within the Lamborn Special Interest Area, as well as infrastructure for springs and reservoirs.

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*

<b>Item</b>	<b>Data Source</b>
<b>Roadlessness</b>	Colorado Roadless Rule at 36 CFR part 294 et seq.
	Forest Service inventory pursuant to FSH 1909.12,chapter 70, section 71
<b>Naturalness; Outstanding Opportunities for Solitude or Unconfined Primitive Recreation</b>	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
<b>Supplemental Values</b>	
Ecosystem representation	TWS Ecosystem Representation 2016
Wildlife	Colorado Parks and Wildlife All Species Activity mapping data, 2016





## Mendicant Ridge Recommended Wilderness



**Gunnison National Forest**  
**Paonia Ranger District**  
**11,279 acres**

---

### *General Description*

Mendicant Ridge and the roadless area that surrounds this striking and exposed ridgeline is a unique landscape that retains the highest degree of wilderness character. The size, ruggedness, vast opportunities for solitude and critical wildlife values of the area make it a worthy landscape to be managed as Recommended Wilderness in the GMUG Forest Plan. This Recommended Wilderness is contiguous with the West Elk Wilderness. This area is currently managed as an upper-tier roadless area and Forest Service officials determined that the area had a high degree of wilderness character during the 2018 GMUG Wilderness evaluation. Managing this area as Recommended Wilderness would ensure the protection of the area's wilderness character and preserve the opportunity for it to be included in the National Wilderness Preservation System in the future.

The Mendicant Ridge Recommended Wilderness is within the Northern-Central Highlands and Rocky Mountain Eco-Section (M33IH) with elevations ranging from 7,760 to 12,000 feet. The area lies to the west of the southern flank of the West Elk Wilderness, north of Black Mesa, and southeast of Saddle Mountain. The eastern flank of this addition is bound by Curecanti Creek.

The western portion of the area is generally bound by Mendicant Ridge and North Dyer Creek and encompasses Castle Rock and Slide Down. West Dyer Creek and the West Dyer Trail #885 create the southern boundary of the western flank of the area. The Recommended Wilderness also has a small buffer around the trails just north of Bald Mountain.

Accessibility to this area is limited due to its ruggedness and remoteness. The Recommended Wilderness has five low-use trails. Visitation to the area is highest during the fall hunting season. The Curecanti Trail #870, Slide Down Trail #880, Mendicant Ridge Trail #884, and West Dyer Trail #885 are open to mechanized uses, however, due to remoteness and minimal maintenance, these trails see little mechanized traffic.

### *Naturalness*

The Mendicant Ridge addition retains a great degree of naturalness within its boundaries. The vegetation throughout the area provides for excellent wildlife habitat. The area is dominated by spruce and mixed conifer and includes ponderosa pine, Gambel oak, Douglas-fir, aspen, serviceberry, some spruce-fir, and sagebrush. Scattered small areas of shrub and grass/forb are scattered throughout. Exposed cliff areas also occur throughout, including Mendicant Ridge itself extending to Castle Rock.

The topography is steep and soils are unstable. None of the Recommended Wilderness is considered suitable for timber production and there is no evidence of historic logging. There is little evidence of human use or development and the area remains a very natural-appearing landscape.

The Recommended Wilderness contains sensitive wildlife habitat, including an important migration corridor, high-quality winter range, a production area, and summer concentration areas for elk; suitable habitat for lynx; winter concentration areas, nesting sites, and winter forage areas for bald eagle; breeding range for northern goshawk; black bear fall range and summer concentration areas; mule deer summer range; and potential nesting areas for peregrine falcon near Castle Rock at the western tip of Mendicant Ridge. Watersheds in the area sustain sensitive populations of Colorado River cutthroat trout, including in the South Smith Fork and Doug Creek.

### *Outstanding Opportunities for Solitude or Unconfined Primitive Recreation*

Rugged terrain and challenging access make opportunities for solitude easily attainable in this area. The Curecanti Creek trailhead lies at the southern boundary of the easternmost flank of the Recommended Wilderness, and travel to this trailhead is limited to a four-wheel-drive road. The Crystal Creek Road provides access to Bald Mountain and divides the eastern and western portions of this polygon, however, the road is approximately 12 miles from the Forest Service boundary and approximately 20 miles from the town of Crawford, making it quite a long trek. For those who make the trip, there are abundant opportunities for hunting, fishing, horseback riding, and hiking, and chances are good that there won't be many other people around.

The Slide Down Trail #880 is often washed out in the spring and the trail can become hard to find and extremely rocky. The Mendicant Ridge Trail #884 is also hard to follow and an inexperienced hiker may get lost quite easily. The majority of traffic in this area occurs during hunting season, with one outfitter operating in this region. The Black Mesa grazing allotment is active within this Recommended Wilderness proposal. Managing the area as Recommended Wilderness will not affect any grazing activities in this area.

#### *Size and Roadlessness*

The Mendicant Ridge Recommended Wilderness is 11,279 acres and is contiguous to the 176,412-acre West Elk Wilderness. There are no roads within the unit. The unprotected roadless area offers needed additions to the wilderness network and could significantly enlarge the West Elk Wilderness.

#### *Manageability*

The Mendicant Ridge addition is readily manageable as Recommended Wilderness. The limited number of trails in this area are not open to motorized uses. We recommend limitations on mechanized use within this unit. The area has a low potential for oil and gas resources, no likelihood of hard rock minerals, and is considered unsuitable for timber harvest. Historic and existing compatible uses, including all grazing activities and valid existing rights, should be allowed to continue by future management or designations.

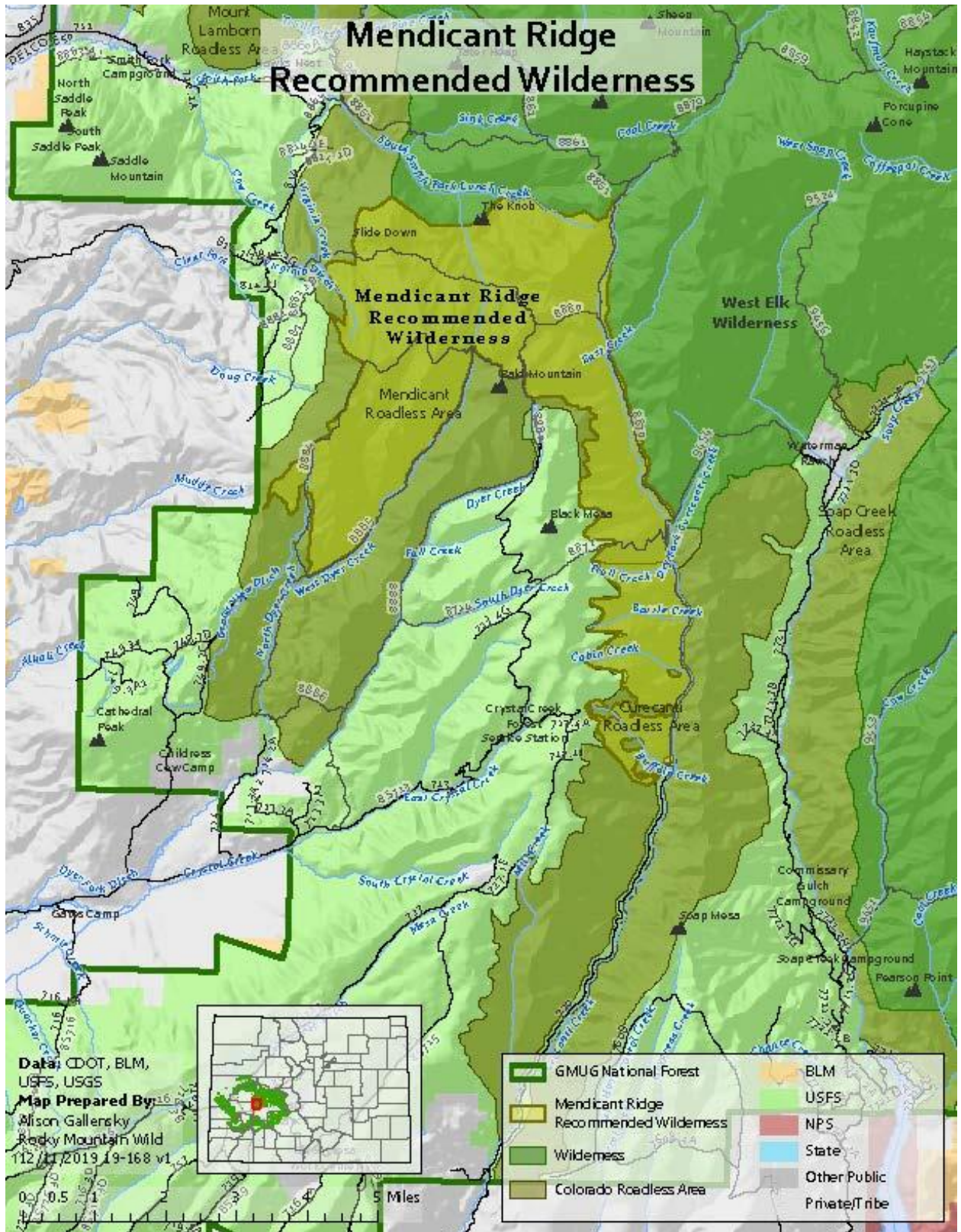
This area can receive significant use during hunting season. There is ATV use on the southern tip of Bellmire Ridge, just outside this unit. Winter snowmobile use is heavy up to Bald Mountain, although topography limits access much further west, north, and east. Buffers around the trails in this area will allow for this use to continue if this recommended Wilderness proposal is adopted. This polygon does not include Bellmire Ridge and has a 150-foot buffer around the West Dyer #885, Mendicant Ridge #884, and Bald Mountain Tie-in #882 trails in the Bald Mountain area. This Recommended Wilderness is within several state-defined source water assessment areas (municipal water supply).

*Information Resources*

<b>Item</b>	<b>Data Source</b>
<b>General Description</b>	GMUG Revised Wilderness Evaluation Report, March 2019
	Outdoor Alliance GMUG Vision, West Elk Backcountry Area, 2019
<b>Size and Roadlessness</b>	Colorado Roadless Rule at 36 CFR part 294 et seq.
	Forest Service inventory pursuant to FSH 1909.12, chapter 70, section 71
<b>Naturalness; Outstanding Opportunities for Solitude or Unconfined Primitive Recreation</b>	Forest Service inventory pursuant to FSH 1909.12, chapter 70, section 72
	USDA Forest Service, R2, Profiles of Colorado Roadless Areas 2008
	GMUG Revised Wilderness Evaluation Report, March 2019
<b>Connectivity</b>	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
<b>Lynx Potential Habitat</b>	Colorado Parks and Wildlife Species Activity Mapping 2019
<b>Peregrine Falcon Nesting Habitat</b>	Colorado Parks and Wildlife Species Activity Mapping 2019
<b>Elk Habitat and Calving Areas</b>	Colorado Parks and Wildlife Species Activity Mapping 2019
<b>Cutthroat Trout Habitat</b>	USDA Forest Service, R2, Profiles of Colorado Roadless Areas 2008



Map of Proposed Area





## Pilot Knob Backcountry Wildlife Conservation Area



**Proposed Special Management Area**  
**Gunnison National Forest**  
**Paonia Ranger District**  
**24,100 acres**

---

### *General Description*

The Pilot Knob Backcountry Wildlife Conservation Area (BWCA) is located approximately two miles north of Somerset. Most of this proposed BWCA is managed by the Paonia Ranger District as an inventoried roadless area under the Colorado Roadless Rule. Springhouse Park is in the geographic center of the roadless area and Pilot Knob (9,682') is the highest point in the roadless area. The BWCA boundary extends north of the roadless area to include important habitat around Sheep Mountain. The proposed BWCA is bound on the west by the National Forest boundary, forest road 851, and the Springhouse Park Trail (TR 704.4D). The eastern boundary



generally tracks the National Forest boundary and forest road 849. The border between National Forest land and BLM land represents the southern boundary of this proposed BWCA.

Aspen forests dominate this proposed BWCA. Gambel oak occurs at the lower elevations and snowberry occurs in the species mix at higher elevations. Spruce is mixed with aspen on the north-facing slopes at higher altitudes. Riparian habitats occur in Springhouse Park and around scattered ponds and lakes. There are also sensitive fens in the Springhouse Park area. Additionally, there are numerous open meadows with healthy amounts of native sage in the area.



The proposed Pilot Knob BWCA provides summer range for mule deer, black bear, mountain lion, and elk; calving areas and winter range for elk; priority habitat and summer range for moose; bald eagle winter range; and Lynx habitat. Aspen dependent sensitive species such as the Northern goshawk, purple martin, flammulated owl, and the American marten also have suitable habitat in the area.

The Springhouse Park Trail is a primitive road within the proposed BWCA. The road forks just southeast of Pilot Knob and both branches tie into trails. These trails see consistent use during hunting season, but they are quiet for the rest of the year. The area overlaps two sheep allotments, and sheepherders are the most frequent visitors to the area. Carved trees throughout the area show signs of the area's long sheepherding history.

Portions of the area north of NFST 804 Buck Mesa Trail retain a very high degree of naturalness and provide opportunities for solitude and a sense of remoteness. The southern portion shows some evidence of historic coal exploration. Vegetation in the southern portion of this unit is not so dense, generally characterized by gambel oak. Sights and sounds from adjacent private and BLM lands are more noticeable in the southern portion of this unit.

This area lies within a source water assessment area (municipal water supply). Over 70% of this assessment area is managed by the FS and is recognized as having a high value for domestic water supply. Headwater rivers flow from runoff in the area, which connect to the North Fork of the Gunnison River and ultimately provide the water for irrigation.

As a whole, the area provides phenomenal and increasingly scarce unfragmented, mid-elevation habitat for wildlife. The area remains relatively pristine while lands around it have undergone a significant transformation from development related to agriculture, mining, and oil and gas exploration. Even though Pilot Knob encompasses a portion of the Gunnison National Forest that is moderate in elevation and only a few miles from the nearest community (Somerset), the area is natural and unspoiled. It is challenging to access, and Pilot Knob does not attract crowds that other parts of the National Forest do. The Pilot Knob BWCA maintains an important range of habitat types to support wildlife and backcountry hunting, and it supports historic grazing operations. Protecting this increasingly scarce unfragmented habitat should remain the management goal for this area.

### *Management Recommendation*

The Pilot Knob BWCA should be managed to protect and enhance its uninterrupted wildlife habitat, solitude, and scenic integrity and to provide socioeconomic opportunities that emphasize backcountry hunting, primitive recreation, and traditional grazing. Access to the area should remain limited to existing routes and maintenance of existing routes should be minimal. The Forest Service should work to maintain opportunities for solitude in this predominantly unfragmented forest, and scenic views. We recommend the Forest Plan adopt the following management approach for the BWCA:

#### Desired Conditions

- Management emphasis should be on maintaining the area's premier hunting, wildlife viewing, and high-quality wildlife habitat.
- Recreation management should emphasize primitive backcountry recreation opportunities.

#### Standards

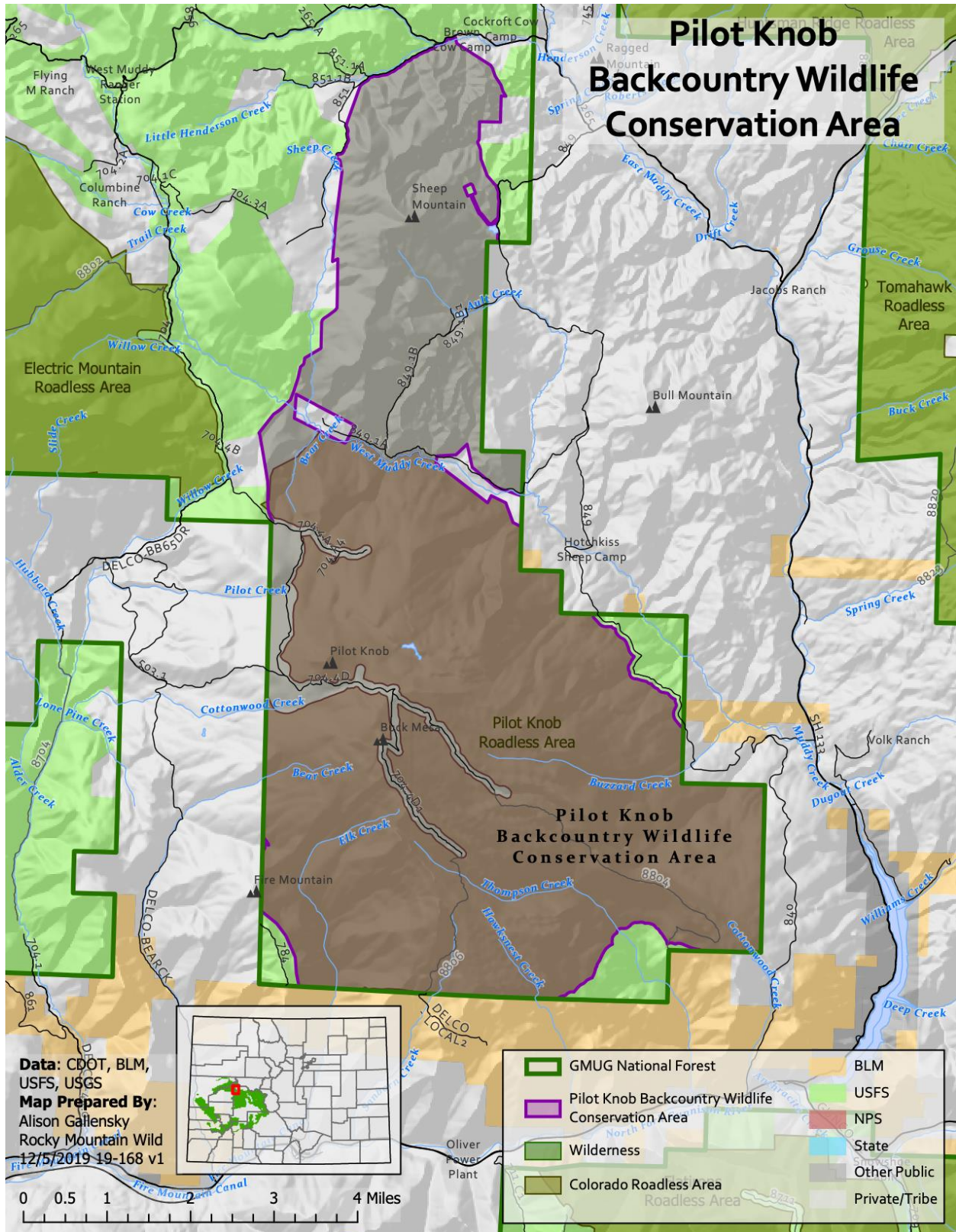
- The Pilot Knob BWCA should be administratively unavailable for oil and gas leasing and mineral material sales. At a minimum, the Forest Plan should apply a No Surface Occupancy (NSO) stipulation to the full BWCA that is not subject to waiver, exception or modification.
- Timber harvest should be prohibited.
- 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
<b>Roadlessness</b>	Colorado Roadless Rule at 36 CFR part 294 et seq.
	Forest Service inventory pursuant to FSH 1909.12,chapter 70, section 71
<b>Naturalness; Outstanding Opportunities for Solitude or Unconfined Primitive Recreation</b>	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
<b>Supplemental Values</b>	
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
Elk Severe Winter Range	Colorado Parks and Wildlife Species Activity Mapping 2017
Gunnison Sage-grouse Historic Habitat	Colorado Parks and Wildlife Species Activity Mapping 2017
Gunnison Sage-grouse Overall Range	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
Gunnison Basin Potential Conservation Area with Outstanding Biodiversity Significance	Colorado Natural Heritage Program Potential Conservation Areas 2017
Ecosystem Representation	TWS Ecosystem Representation 2016



Map of Proposed Area





## **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
<b>Roadlessness</b>	Colorado Roadless Rule at 36 CFR part 294 et seq.
	Forest Service inventory pursuant to FSH 1909.12,chapter 70, section 71
<b>Naturalness; Outstanding Opportunities for Solitude or Unconfined Primitive Recreation</b>	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
<b>Supplemental Values</b>	
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

