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Comments: From: Scott Jones [mailto:scott.jones46@yahoo.com]

Sent: Thursday, June 27, 2019 2:23 PM

To: Stewart, Chad -FS &lt;chad.stewart@usda.gov>;

Subject: Wilderness one pager

Chad

I drew up a one page summary of our Wilderness concerns with the draft RMP that we discussed last week so you don't have to try and digest the entire comments - I will send out wilderness inventory comments in a second but they are pretty long as we are trying to lay out the history of these areas and establish the fact that Colorado has designated a lot of Wilderness and also had released a lot of areas as well for non-wilderness. Since we have discussed this the complete comments are probably overkill.

I have attached maps the "further wilderness inventory" areas from the GMUG draft, the 1980 Colorado Wilderness Act and related Congressional memo and maps from the Primitive area inventory reports so you can compare the boundaries. I am not going to send you the complete reports as they are huge(100 page each) but the overlap of primitive area boundaries and further wilderness inventory is pretty apparent

Also if you need more info on the fact the wilderness inventory folks were clearly not aware of the Congressional mandate of "no buffers for Wilderness in Colorado" - those specific references are in the full comments

Any questions please give me a yell.

Scott

From ex 2 House attachment: At the same time, the Committee recognizes that the public currently relies on motorized access to certain key areas, and therefore amended the bill to exclude lands in the vicinity of Nellie Creek and to excise two road corridors which extend part of the way up the Middle and West Fork Cimarron River drainages. Another boundary adjustment was made on the extreme western end of the area near Baldy Peak to exclude about 1,500 acres which are used by grazing permittees for frequent motorized access and intensive management activities associated with livestock grazing. The bill abolishes the Un[shy]compahgre and

Wilson Mountain Primitive Area designations for those residual Primitive Area lands lying outside the boundaries of the three proposed wildernesses. Most of these remaining lands are so interspersed with patented mining claims that their management as wilderness would prove infeasible.

## 1. Two levels of the Wilderness Act

Federally [ndash] Wilderness Act of 1964 [ndash] obviously consistent [ndash] well known

State level [ndash] each state has its own Wilderness Act [ndash] awareness is much more limited and these acts were far broader in scope than just designation of Wilderness

### 1.

- \* Generally Congress stepped in to resolve the litigation around the RARE and RARE 2 processes
- \* Some states simply designated Wilderness (South Dakota PL 95-560 [sect]201- [sect]203) while others took this opportunity to make larger scale land management decisions (Colorado)
- \* compare [sect]101 of Colorado to [sect]201 for South Dakota

## 2. Colorado Wilderness Act was passed in 1980 (PL 95-560 generally [sect]101- 111)

### 1.

- \* Resolved possibility of litigation around Roadless Rule/wilderness inventory by Congressional determination that RARE inventories were sufficient [sect]101(A)(1)& A(2) and [sect]107(a)
- \* Clearly stated areas not designated shall be returned to management for non-wilderness multiple use [sect]101(a)(3) & [sect]101(b)(2)
- \* Designated 20 Wilderness areas throughout the state [sect]102 (a)
- \* Created 9 new WSA [sect]105(a)
- \* Abolished two existing primitive area designations- [sect]102(b)- Wilson Mesa, Uncompahgre and Uncompahgre Adjacent (not sure why inventoried separately)
- \* Specifically identified basis for many of the boundaries of particular Wilderness areas with great detail ( bill memo )- unprecedented
- \* Modified Wilderness Act to allow grazing related activities and forest treatments with mechanical means ([sect]109)
- \* Stated buffers for Wilderness areas are not allowed or required ([sect]110)

## 3. Colorado Wilderness Act has been amended several times since [ndash] most recently Hermosa

### 1.

- \* Continued to designate and release areas for Wilderness and non-Wilderness usage

## 4. All the further inventory areas for Wilderness GMUG areas addressed in draft RMP were the subject of previous Congressional Action with release of primitive areas for non-wilderness multiple use

### 1.

- \* Additionally we must question the inventory on the buffer issue ([sect]110) as previous inventory on the GMUG specifically designated areas because of their characteristics as a buffer for existing Wilderness

[ndash] clearly that violates the no buffer management requirements of Colorado Wilderness Act