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Title:

Comments: WSCC Supplemental Comments for GMUG Working Draft

Hi Sam and Brittany,

Attached are additional comments for the Working Draft of the GMUG Forest Plan Revision from us at the Western Slope Conservation Center. Again, thank you both for all of your hard work in this process!

Ben

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Ben Katz

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Grand Mesa, Uncompahgre, and Gunnison National Forests Attn: Plan Revision Team

2250 Highway 50

Delta, CO 81416

Dear GMUG Planning Team,

Please accept the following supplemental comments on the Working Draft of the Grand Mesa, Uncompahgre, and Gunnison National (GMUG) Forest Plan Revision on behalf of Western Slope Conservation Center (WSCC). We thank you for providing this opportunity for public input at this early stage of the revision process. While not required, we are fortunate to be able to provide valuable input on how the US Forest Service will manage the National Forests that provide invaluable natural resources and benefits that will impact our community. We are glad the US Forest Service is considering ways to protect important natural resources like wildlife habitat, water supplies and sources, wild and scenic rivers, air quality, and recreation throughout this process. Please include this supplemental comment in the administrative record.

We appreciate the time and effort that the US Forest Service has given to updating their Forest Management Plan. We look forward to continuing to work with you as this process moves forward. If you have questions,

please do not hesitate to contact us to discuss in further detail.

Sincerely,

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I. Introduction

This comment is a supplemental document to be considered in addition to our coalition comments (HCCA et al 2019), specifically regarding feedback on the forestwide direction, management area direction, and monitoring direction within the Working Draft of the Grand Mesa, Uncompahgre, and Gunnison National Forests Plan Revision (Working Draft). We are particularly interested in how the working draft will impact the watersheds and forests that surround the North Fork Valley and Lower Gunnison Watersheds. With this feedback document, we offer specific recommendations on how certain plan components should be adjusted to protect critical values of concern to the western slope communities.

We incorporate additional documents, which have been previously submitted to the US Forest Service, to be used for reference as indicated below:

1. Scoping Comments on the Grand Mesa, Uncompahgre, and Gunnison National Forests Revised Management Plan. Defenders of Wildlife, Rocky Mountain Wild, Rocky Smith, Quiet Use Coalition, Grand Junction Area Chapter [ndash] Great Old Broads for Wilderness, Western Colorado Congress, Northern San Juan Broadband [ndash] Great Old Broads for Wilderness, Sheep Mountain Alliance, The Wilderness Society, Colorado Native Plant Society, Western Environmental Law Center. June 1 2018. 56 pgs. (Referenced as: Defenders et al. 2018)

2. Supplemental Scoping Comments specific to Lamborn and Coal Mountain Areas. Western Slope Conservation Center. July 26 2018. (Referenced as: Lamborn and Coal Mountain Scoping Comments 2018)
3. Comments on Draft Watershed Assessment Report. Western Slope Conservation Center. December 8, 2017. (Referenced as: Watershed Assessment Report Comments 2017)

II. Management Area Recommendations

As mentioned within the Community Conservation Proposal, referenced in our coalition's most recent comments to the US Forest Service Planning Team, WSCC recommends that additional management areas be administratively designated within the North Fork area, including the Electric Mountain Recommended Wilderness, Chalk Mountain Recommended Wilderness, Elk Park Recommended Wilderness, Mule Park Important Bird Area, Flattops Special Interest Area, Currant Creek Special Interest Area, and Priest Mountain Special Interest Area.

a. Coal Mountain Recommended Wilderness

WSCC recommends that the GMUG Forest Planning team adopt the Coal Mountain Recommended Wilderness area in the Draft EIS of the GMUG Forest Plan. As noted in our Lamborn and Coal Mountain Scoping Comments from 2018, this recommendation is based on community involvement, on-the-ground fieldwork, and best-available science.

Mount Lamborn provides critical values to the town of Paonia and the North Fork Valley. Protecting this area under landscape-level Recommended Wilderness and Special Management Area designation would

safeguard drinking water resources for the town of Paonia. Furthermore, these designations would protect the scenic background of the town of Paonia and would demonstrate the importance this area has to the town.

In the Wilderness Evaluation process, the Forest Service has found that Mount Lamborn exhibits a high degree of wilderness characteristics. From the GMUG Revised Wilderness Evaluation, the US Forest Service notes:

[Idquo][hellip][Mount Lamborn exhibits] very naturally-appearing vegetation and wildlife communities, lack of

improvements, and quality opportunities for solitude or primitive and unconfined recreation. The area also possesses high-quality habitat and scenic traits. The shape of the area is contiguous, it is adjacent to West Elk Wilderness, and natural features could provide manageable boundaries. The entire polygon is currently managed as an Upper Tier Colorado

Roadless Area.”

Mount Lamborn is the picturesque pinnacle of all viewsheds within the North Fork Valley, and deserves the highest level of protection land can attain. Please see Appendix 1 for additional mapping and reference documents concerning specific recommendations for this area.

b. Lamborn Special Interest Area

The Lamborn Special Interest Area is located south/southeast of Paonia, east of Hotchkiss, and north of Crawford, and contains a large portion of the Mount Lamborn Roadless Area. The Lamborn Special Interest Area provides important wildlife habitat and migration routes due to 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. As the scenic backdrop for the towns of Paonia, Hotchkiss, and Crawford, as well as heavily contributing to the drinking water resources for the town of Paonia, management in this area should be administratively removed from oil and gas development and include prohibition on timber harvest.

Please see Appendix 1 for additional reference documents concerning recommendations for this area.

c. Clear Fork of Muddy Creek Special Interest Area

General Description

The Clear Fork of Muddy Creek Special Interest Area is roughly located northeast of the West Muddy Guard Station, west of McClure Pass, and encompasses a significant percentage of the headwaters for Paonia Reservoir and source water for downstream communities, including the North Fork Valley and beyond. WSCC recommends additional landscape-level protections to specifically manage for wildlife habitat within Clear Fork of Muddy Creek watershed.

Almost entirely contained within the Clear Fork Roadless Area, the Clear Fork of Muddy Creek Special Interest Area provides invaluable landscape connectivity for big game species, and management of this area for its wildlife values, as oil and gas development further encroaches on this area, is essential.

Furthermore, Colorado Parks and Wildlife notes this area as an important area for cutthroat trout restoration.

Supplemental Values

This area contains some of the most important big game habitat in the state, and is encompassed within game management unit 521, one of the highest producing GMU[squo]s in the country, and significantly impacts the economies of the North Fork Valley. Furthermore, CPW has conducted recent studies and

confirmed that Clear Fork contains genetically pure populations of [ldquo]Green Lineage[rdquo] Colorado River cutthroat trout (CRCT). With this information, CPW believes there is a strong possibility of [ldquo]Green Lineage[rdquo] CRCT throughout the Clear Fork of Muddy Creek watershed.

Management Area Recommendations

Projects that may occur within the Clear Fork of Muddy Creek SIA should be designed to minimize negative impacts to wildlife, specifically the CRCT and big game species that occur in this area.

Management recommendations for this SIA should include monitoring programs that ensure the critical wildlife values are maintained as projects occur. Furthermore, incorporating the Clear Fork watershed within an SIA designation would manage this landscape to enhance the hunting economy of the North Fork Valley.

III. Invasive Species

FW-STND-IVSP-04 mentions that [ldquo]contract and permits for activities on the Forests[hellip]will include requirements to both prevent the introduction and/or spread of invasive species and treat invasive species on National Forest System lands and resources that occur as a result of their actions.[rdquo] We believe this should be altered to include invasive species monitoring after ground-disturbing projects are completed, and monitoring should continue until vegetation has become established throughout the project area. Monitoring is crucially important to managing invasive species on the Forests, and without diligent monitoring and retreatment, invasive species can re-establish even after successful mitigation and removal.

IV. Conservation Watershed Network

We like the concept of conservation watershed networks, which [ldquo]have high-quality habitat and functionally intact ecosystems that contribute to and enhance conservation and recovery of specific target species[rdquo], however more definition is needed. We would like to know what protections are

included within a Conservation Watershed Network designation, and how will the objectives meet the desired

condition? Also, what is the level of prioritization of sub watersheds included within the Conservation Watershed Network as opposed to sub watersheds that are excluded?

[Oslash] Recommendation: The working draft designates 11 sub watersheds. This seems like a small number given the enormity of the GMUG. We would recommend that the forest service consider more watersheds to cover a wider geographic area, including but not limited to:

- [bull] Colorado River Cutthroat Trout, Hubbard Creek, 140200040405
- [bull] Colorado River Cutthroat Trout, Smith Fork of the Gunnison River, 140200021205
- [bull] Any sub watersheds that include endangered or at-risk fish or riparian plant species

[Oslash] Recommendation: Guideline: To protect each species within the subwatershed, any ground- disturbing project approved within each subwatershed must have additional monitoring and

protection frameworks in place at the beginning of each project that identifies how disturbances and impacts to target species will be managed

[Oslash] Recommendation: Guideline: To monitor subwatersheds and target species within the Conservation Watershed Network, an analysis should be developed and maintained every 1 to 3 years for watersheds that may need to be added or removed from the Conservation Watershed Network.

[Oslash] Recommendation: Standard: Activities within each subwatershed identified shall not create detrimental conditions for target species.

V. Priority Watersheds

While we appreciate the Forest Service designating the need for the identification of Priority Watersheds throughout the Forests, only designating one watershed seems like an oversight. The Working Draft defines Priority Watersheds as [ldquo]those watersheds where plan objectives for restoration would concentrate on maintaining or improving watershed condition.[rdquo]

Additional language is needed in defining [ldquo]watershed condition[rdquo], and what objectives will lead us to [ldquo]maintaining or improving[rdquo] this condition. Specifics should also be established for how these watersheds will be managed. Furthermore, there are several watersheds within the North Fork area that should be considered as priority watersheds, including:

Coal Creek, 140200021205, is a popular hiking spot, with relatively easy access from the town of Paonia to the West Elk Wilderness and will likely see increased recreational use within the time the Forest Plan is active throughout the Forests. Along FS-709, there are several dispersed camping sites within 100 feet of Coal Creek. As more recreation occurs along this watershed, it should be a priority for maintaining or improving watershed condition.

Hubbard Creek, 140200040404 and 140200040405, is in a degraded state at this current point in time, mainly due to many diversions. It is an important ecological area due to its significant wildlife habitat and has potential for significant restoration projects for Colorado River Cutthroat Trout. Additional management priority for this watershed would have a significant impact on ecological concerns.

VI. Energy and Minerals

FW-OBJ-ENMI-09 states that [ldquo]within 3 years of plan approval, revise oil and gas leasing analysis to identify lands open or closed to oil and gas leasing.[rdquo] While we appreciate a separate oil and gas suitability analysis specific to leasable minerals on the Forest, it is important to include within the

Working Draft a series of standards and guidelines for how oil and gas leasing will interact with other Working Draft plan components, such as Wildlife Management Areas, Special Interest Areas, Roadless Areas, subwatersheds within the Conservation Watershed Network, invasive species management, and the transportation system.

VII. Recreation

WSCC appreciates the GMUG Planning Team[rsquo]s effort to address recreation throughout the Forests. As outdoor recreation continues to increase throughout Colorado and within the GMUG Planning area it is

vitally important to manage human impacts on the landscape. Within the North Fork Area, the most widely used recreation area is Kebler Pass, and it[rsquo]s inclusion as a priority area within the High-Use Recreation Area MA 4.2 is recommended.

Furthermore, the summer and winter Recreation Opportunity Spectrum (ROS) for the North Fork area should be revised to more accurately depict the desired conditions of the landscape. Much of the area along the southern boundary of Grand Mesa National Forest extending through Gunnison National Forest through the Iron Point area to Buck Mesa and Springhouse Park is shown on the Summer ROS to be directed towards the semi-primitive motorized desired condition. While motorized routes in this area are present, the portion of Forest which

is being changed from semi-primitive non motorized to semi- primitive motorized occurs in between the motorized trails. WSCC believes that this area should not be managed for motorized recreation. While motorized recreation is and should still be allowed on the trails in this area, managing for motorized recreation in areas off-trail open up public lands to increased wildlife habitat disturbances and soil and vegetation damage.

When looking at the Winter ROS, we support the Forest Services efforts in moving the area near Mount Lamborn and Landsend Mountain towards a semi-primitive non-motorized desired condition. This area should be considered for additional management area designations as well, as noted above and in Appendix 1.

Appendix 1

Coal Mountain Addition to West Elk Wilderness

Proposed Wilderness Designation Gunnison National Forest

Paonia Ranger District

15,200 acres

General Description

The Coal Mountain wilderness addition encompasses the back side 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 will be protected via wilderness designation, 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 proposed 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 very small at any time of year due to ruggedness and weather conditions, with the largest number of visitors 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.

Outstanding Opportunities for Solitude or Unconfined Primitive Recreation

Two of the primary drainages that comprise the area, Second Creek and South Fork of Minnesota Creek, lack trails paralleling the creeks as commonly occurs elsewhere. The absence of trail infrastructure and frequent dense aspen creates a strong sense of seclusion and isolation, providing outstanding opportunities for solitude.

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

Size and Roadlessness

The Coal Mountain proposed wilderness addition 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 Area 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 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 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 wilderness addition 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 Western Slope Conservation Center supports 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 including all grazing activities should be allowed to continue by future management or designations.

Information Resources

Item	Data Source
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Roadlessness	Colorado Roadless Rule at 36 CFR xx
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	Forest Service inventory pursuant to FSH
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	1909.12,chapter 70, section 71
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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
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	Colorado Roadless Areas 2008
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	GMUG Roadless Inventory & Evaluation for
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	Potential Wilderness Areas, 2005
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Supplemental Values

Connectivity	SREP Wildlands Network 2003,
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	USDA Forest Service Southern Rockies Lynx
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	Amendment, 2008
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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 (*Oncorhynchus clarkii pleuriticus*) Colorado Natural Heritage Program Element

Occurrences 2017

Ecosystem Representation TWS Ecosystem Representation 2016