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Sent by electronic mail only

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Dear Sam and Levi,

I write to thank you both for meeting with us on March 25, 2022 to discuss the Grand Mesa, Uncompahgre, and Gunnison National Forest (GMUG) forest plan revision process. Our meeting provided us with context to better understand the Forest Service's concerns over flexibility, climate change, and wildfire.

Based on that meeting, we are deeply concerned about how the GMUG draft plan will be implemented on the ground. As you know, and we discussed, Wilderness Workshop has worked to secure meaningful protections in and adjacent to roadless areas in the North Fork for almost two decades. In early 2020, we submitted proposed special management areas (SMAs) and recommended wilderness areas (RWAs) to the Forest Service for consideration and analysis in the GMUG draft environmental impact statement (DEIS). This letter specifically concerns the proposed Muddy Country Watershed and Wildlife Conservation Area, Pilot Knob Backcountry Wildlife Conservation Area, Hubbard Park RWA, Coal Mountain RWA, Mendicant Ridge RWA, and Lamborn Special Interest Area. Our March 25th conversation confirmed that the Forest Service has not analyzed our proposed SMAs and RWAs in the DEIS.

The management prescriptions analyzed in the DEIS are woefully inadequate to protect the locations we submitted for SMAs and RWAs, specifically in Muddy Country, Pilot Knob, Hubbard Park, and Lamborn SIA. The ambiguous plan components and management prescriptions considered in the DEIS will impede efficient National Forest Management Act consistency determinations and lead to confusion about allowable uses. One benefit to SMAs is

that these discrete units clarify the allowable uses (e.g., no new routes). The Forest Service’s reliance on a combination of the recreation opportunity spectrum and scenic integrity objectives to protect these areas in the DEIS fail to give agency staff and the public a clear direction for what is allowed in certain landscapes, and overall subverts the intent of NFMA and the 2012 Planning Rule.

The Forest Service should adopt SMAs with specific plan components to improve the alternatives under consideration and implement a forest plan that provides clear, concise management direction for the Forest Service and the public. We have attached Carson National Forest revised forest plan, which uses SMAs to communicate allowable uses in certain areas. This plan is consistent with Forest Service guidance for the 2012 Planning Rule, which requires the agency’s forest plan components “[a]re written clearly and with clarity of purpose and without ambiguity so that a project's consistency with applicable plan components can be easily determined.” FS Handbook 1901.12 at 33. SMAs specify the geographic location where plan components are applicable. *Id.* We previously highlighted these proposed plan components in our letter to the GMUG dated May 28, 2020. At the time, we referenced the Carson National Forest draft plan, which has since been finalized.

The Carson National Forest’s treatment of SMAs should provide the GMUG with an example for why SMAs support the Forest Service in determining allowable uses within an area, and a replicable framework for SMA designation.¹ As you will see in this attachment, the Carson National Forest explicitly states allowable uses within SMAs. These standards are not solely prohibiting uses like timber management, but rather putting clear sideboards on use. *See Carson NF Final Plan at 176* (stating “Temporary roads that support ecosystem restoration activities, fuels management, or other short- term projects must be closed and rehabilitated upon project completion, to protect watershed condition, minimize wildlife disturbance, and prevent illegal motorized use.”). While we understand the Forest Service’s desire for more flexibility, we strongly believe that SMAs and their required plan components add to the clarity, consistency, and overall strength of a forest plan.

We appreciate you both taking the time to meet with us and explain the revised forest plan as it relates to the North Fork. We will continue to advocate for these landscapes and stay engaged in the forest planning process. Please let us know if there is additional information we can provide to ensure more meaningful protections are considered and implemented for the areas highlighted in our prior comments.

Sincerely,

/s/Oliver Wood

Oliver Wood
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¹ See Attachment 1 for the Carson National Forest’s Final Land Management Plan, Chapter 3: Plan Components for Designated Areas and Management Areas.

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