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First name: Scott

Last name: Braden

Organization: Conservation Colorado

Title: Wilderness and Public Lands Advocate

Comments: Conservation Colorado appreciates the opportunity to make scoping comments in the forest plan revision process for the Grand Mesa, Uncompahgre and Gunnison National Forest. This large and diverse forest are critical to the communities and environment of Colorado. Our 36,000 member activists care deeply about the GMUG and the choices made in the forest plan that will have a direct and hopefully beneficial impact on habitat, forest health, climate change, sustainable recreation, water resources and more.

We hope that the forest service will prioritize each of those areas and identify concrete steps to assure improvement and progress in each.

While we are engaged across the whole forest, Conservation Colorado and our members have been focusing in particular on the Grand Valley Ranger District. We have identified a set of three priorities that seem most relevant to this portion of the forest: protecting wild lands, creating opportunities for sustainable recreation, and conserving watersheds.

We have signed on to numerous coalition letters that build out much detail on these aspects. In particular, the Citizens' Wilderness and Designations Proposal represents an enormous opportunity to protect public lands. Conservation Colorado and other coalition members have engaged with the outdoor recreation community (the Outdoor Alliance in particular) in an ongoing dialogue to make sure there are no conflicts between their recreational goals and our conservation goals. Indeed our members are often shared, and many people identify as both outdoor recreationists and conservationists. We may amend the Proposal as a result of this dialogue. Conservation Colorado believes it is important to align recreation and conservation to the extent practicable.

To protect wild lands, the Forest Service should use recommended wilderness where appropriate, but also management prescriptions to maintain primitive nature of the forest's primitive backcountry and unbroken habitat lands. In particular, we strongly endorse the following areas on the Uncompahgre Plateau for recommended wilderness designation: Dominguez, Kelso Mesa and Unaweep. The Uncompahgre Plateau in particular, and the Grand Valley Ranger District more broadly, are underrepresented in wilderness areas. This makes recommending for wilderness remaining qualifying areas critically important, and this process is probably the last opportunity ever to get these parcels into protective designations.

Although Unaweep may appear small, when considered in tandem with the contiguous BLM lands with wilderness characteristics, the overall unit is much larger. Additionally, the forms an important complex of wildlands on both BLM and Forest in the Dolores River basin that also include The Palisade and Sewemup Mesa wilderness study areas and other associated BLM lands with wilderness characteristics. Dominguez Canyon is contiguous with, and would complement, wilderness protections already designated by Congress and within the Dominguez-Escalante National Conservation Area. Finally, Kelso Mesa has been managed to protect its primitive backcountry character, and subsequent road decommissioning in the area have only improved its wilderness character. The Forest Service should extend the highest level of administrative designation to this important wildland popular with backcountry hunters.

The Forest Service should take the opportunity of the forest plan revision to create a framework for manageable and sustainable recreation, especially in the busy Grand Valley Ranger District. The population of Mesa County is likely to grow, but more importantly, the economy of the region is starting to be redefined as home to a growing outdoor recreation hub. The GMUG should plan proactively for this, both the assure the sustainability of the recreational resource, but also to do its part to support this economic diversification effort in Western Colorado. Make sure that the range of recreational opportunities is balanced, and reflects the increasing use of human-

powered recreational pursuits. Hiking, biking, backcountry and nordic skiing are examples of rising recreational uses. They are importantly less impactful, less polluting and cheaper to access than motorized recreation. However, they still have impacts on the land and wildlife, so the Forest Service should plan to accommodate growth in these activities. In particular, Grand Mesa and the Fruita Division will see increasing human powered recreational growth, and we urge the Forest Service to actively seek partnership with local governments, conservation and recreation organizations to help plan and steward for the future.

Finally, the Forest Service should act decisively in the plan to protect the Kannah Creek and other key watersheds. It is critically important that Kannah Creek be protected from any significant surface disturbance that could negatively impact the watershed. Given the worsening drought conditions driven by climate change, the stakes are even higher. Please consider a special watershed protection designation for Kannah Creek that imposes a mineral withdrawal and prohibition on other significant surface disturbance, while allowing for sustainable recreational opportunities with appropriate regulation.