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Comments: Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision #51806

GMUG National Forests Plan

Forest Supervisor: Chad Stewart

In my comments on the draft Plan and DEIS, the objector (Mike Burkley) asked the GMUG to more fully consider that qualifying areas be recommended for wilderness designation. These requests were largely ignored.

#### I. NORTH FORK AREA POTENTIAL WILDERNESS AREAS

##### A. THE FOREST SERVICE FAILS TO ACCOUNT FOR HOW WILDERNESS QUALITY LANDS WILL BE PROTECTED IN THE FOREST PLAN

I objected to this in my comments - " The preferred alternative's 46,000 acres of additional recommended wilderness is a small reflection of lands that should be recommended. Our Wilderness resources in the North Fork are worth protecting, and GMUG Forest must prioritize these resources before they are lost forever. The Forest Service does not adequately consider the designations in the Gunnison Public Lands Initiative (GPLI) or Community Conservation Proposal. Takeaway: These must be better reflected - and incorporated - in the final plan - especially due to the threat of Climate Change. Gunnison, Ouray, San Miguel, and Hinsdale Counties united to submit a letter to the GMUG stating that "at this time we cannot support the pre-Draft plan and Preferred Alternative B as presented." One of their four reasons they stated was the lack of management policies related to Carbon Sequestration. According to the GMUG DRAFT EIS Volume 1. Page 90

Climate Change - Decades of research shows the Earth's climate warmed rapidly during the 20th century and this trend is expected to intensify in the future (USDA Forest Service 2016, Furniss et al. 2010). These changes result in impacts to ecosystem processes including the timing, amount and type of precipitation, invasive species encroachment, shifts in fire regimes and intensity, insect infestations, carbon storage, and species health and resilience (USDA Forest Service 2016, Peterson et al. 2011). As such, climate change is a major ecological stressor in the GMUG. Page 253:

Climate change-driven extreme weather events will likely have rapid, dramatic effects on ecosystems. " Unlike most landscapes that are dominated by human influence, Wilderness is managed so people can enjoy the natural beauty with minimal impact. Areas which have ample wilderness characteristics offer places for community members and visitors alike to reflect and unwind, where humans are merely visitors and natural forces are allowed to dominate in order to preserve natural conditions.

Throughout the GMUG Forest planning process, the Forest Service has undergone an evaluation of wilderness characteristics throughout the Forest. In my comments I advocated for protections of Wilderness characteristics. Plans must include plan components, including standards and guidelines, "to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation." Any area recommended for wilderness or wilderness study designation is not available for any use or activity that may reduce the wilderness potential of an area.

Table 166 of the final Environmental Impact Statement (FEIS at 611-612) outlines the agencies final Wilderness evaluation, which includes specific polygon ID's with evaluation ratings and whether they were included in the preferred alternative. The following polygons are listed with a high evaluation rating but were not included as recommended Wilderness in the preferred alternative:

? G1 East Elk (11,245 acres) - only 1,423 acres in preferred alternative

? G2 Steuben (13,404 acres)

? G4 Pass Creek (3,175) - only 1,775 acres in preferred alternative

? G20-N Sawtooth (28,041 acres)

? G20-E Sylvan Canyon (6,055 acres) - only 2,429 acres in preferred alternative

? G26-W Cataract (10,405 acres)

? GP1 Soap Creek/Mendicant (27,685 acres) - only 10,018 acres in preferred alternative

? P7 Mount Lamborn (8,644 acres)

? GV01 Kelso (44,021 acres)

? N12 East Beaver (3,562 acres)

? O5 Whitehouse Mountain (24,314 acres) - only 12,159 acres in preferred alternative

Total acres with high wilderness characteristics but not included in the final recommended

Wilderness management area = 152,747 acres. Based on an analysis of these areas, only 27,627 acres previously analyzed as having high wilderness characteristics are included as recommended Wilderness areas in the final plan. While 176,797 acres of areas analyzed to have high wilderness characteristics have overlapping boundaries with other management designations, such as Roadless or Wildlife Management Areas, these designations do not offer sufficient protections for the wilderness characteristics in these areas, as they may allow motor vehicle use, mechanized travel, logging and other activities inconsistent with wilderness.

Furthermore, over 40,000 acres of areas with high wilderness characteristics would fall under the General Forest management area, providing no protections for wilderness characteristics.

The Forest Plan and associated Environmental Impact Statement do not address how the wilderness characteristics of the above areas will be managed. Recreation Opportunity Spectrum and Scenic Integrity Objectives do not include standards or guidelines to address these qualities.

The Draft Record of Decision notes that almost 100,000 acres of citizen-proposed Wilderness would require very little change in management structure. Approximately 30% (97,000 acres) of the citizen-proposed wilderness overlap with existing designated Upper-Tier Colorado Roadless Areas. The Colorado Roadless Rule already heavily restricts more impactful development and tree harvest in Upper-Tier Colorado Roadless Areas, and the shift from existing management to management as Recommended Wilderness in these areas would be slight. Draft Record of Decision at page 18. While the Roadless Area designation does provide some protection for these areas regarding additional roads, it does not fully protect wilderness character. In fact, the response to comments section of the Colorado Roadless Rule specifically notes that Upper tier Roadless Areas are not de-facto wilderness Upper tier acres are not a designation of de facto wilderness. Upper tier only restricts tree cutting, road construction and use of LCZs. Upper tier allows for the use of motorized and mechanized equipment, while official wilderness does not. Upper tier allows for motorized recreation, including future development of off-highway vehicle trails; official wilderness prohibits motorized recreation. Upper tier prohibitions can be modified through rulemaking, while wilderness changes require an act of Congress. Colorado Roadless Rule Preamble, 77 Fed Reg at 39589, July 3, 2012.

As is discussed below, many areas not recommended for wilderness designation have strong wilderness character. These wilderness characteristics are under threat from current and future management directives, surrounding land use, population increases, and climate change. Our fear is that during the next planning process, areas that currently carry a high wilderness characteristic evaluation will be significantly declined.

Recommended Improvement: The Forest Service should include significantly more lands as recommended Wilderness in the final plan to accurately protect Wilderness resources.

## B. THE FOREST PLAN FAILS TO INCLUDE THE COAL MOUNTAIN RECOMMENDED WILDERNESS PROPOSAL IN THE FINAL PLAN

My original comments focused on the following poly's: Mt. Lamborn/Coal Mountain - Area P7: The Coal Mountain Recommended Wilderness, proposed in the Community Conservation Proposal, is an incredible landscape which 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.

As an avid hiker in this backcountry area, I have been advocating for the designation of this area as a recommended Wilderness throughout my 7 years of advocacy efforts during the GMUG Forest planning process:

The Community Conservation Proposal provided a thorough assessment of the full area's naturalness, outstanding opportunities for solitude and unconfined recreation, its roadless character, and detail on the area's numerous important supplemental values.

The Community Conservation Proposal also makes a strong case for the manageability of the full 15,200 acre Recommended Wilderness. The agency must take a hard look at protecting the wilderness values identified in my comments and the full citizen proposal, not just the substantially smaller area considered in Alternative D. See my comments:

The Forest Service evaluated this parcel as having high wilderness characteristics in the final Wilderness evaluation:

The Coal Mountain Recommended wilderness is analyzed as "Lamborn (P7a)" and included as recommended wilderness in alternative D of the EIS. The final, full wilderness analysis process can be found in Chapter 3, Volume I of the EIS, Designated and Special Areas, Recommended Wilderness section", and detailed notes for the evaluation of wilderness characteristics are in the project record. The final inventory, final evaluation, and preliminary analysis are in the 2023 Draft EIS, Volume II, Appendix 6 - together these sections compose the full FSH Chapter 70 Wilderness Process. III FEIS at 70.

The final Wilderness evaluation (2023 Draft EIS, Volume II, Appendix 6) finds that the Lamborn (P7a) area has high wilderness characteristics, yet neither the evaluation nor the EIS provides reasoning behind why this parcel was left out of recommended Wilderness designation or how the wilderness characteristics will be managed in the future in the absence of a recommendation for wilderness. While mechanized use is allowed on the Interocean Pass Trail which traverse through the recommended Wilderness area, this type of use on this trail is severely limited due to topology and steepness of the trails. However, recent trail improvements by contractors for the US Forest Service including the use of a mini-excavator have likely degraded the wilderness character on this trail system.

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 human users. The area is particularly notable as winter range for elk, and as part of 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 GMUG's Wilderness Evaluation rated this area with a HIGH degree of wilderness characteristics, which I agree with. Yet your Preferred Alternative does not include this as recommended wilderness. It is included in Alt. D. I've hiked just about every part of the established trails in this area and have climbed most of the surrounding peaks - including the top of Coal Mt from the Inter-Ocean Pass. This entire area certainly meets every criteria that qualifies it for wilderness. There is extraordinary wildlife. For instance, it's importance as a wintering and migrating elk range. Little Coal Creek and Minnesota Creek contain Colorado Cutthroat Trout. This Roadless Area has minimal conflict between humans and its abundant wildlife. The main trails through this area are mostly rugged and have much solitude - its main use is during hunting season. And the accessibility to the 3 main trailheads are pretty difficult, thus enhancing the primitive recreational appeal. The local community seems to be quite receptive to trail stewardship. The historic grazing rights should not be changed with this Wilderness designation. With its bio-diversity, the naturalness and its size, this would be a great addition to the adjacent West Elk Wilderness.

Recommended Improvement: The Forest Service should include the full area identified in Alternative D in the Mt. Lamborn area as recommended Wilderness in the final forest plan.

#### C. THE FOREST SERVICE FAILS TO TAKE A HARD LOOK AT THE MENDICANT RIDGE RECOMMENDED WILDERNESS PROPOSAL IN THE FINAL PLAN

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.

Based on my review, the USFS failed to analyze the Mendicant Ridge Recommended Wilderness in the proposed GMUG land management plan. This area was originally submitted as part of the Community Conservation Proposal during the draft Environmental Impact Statement. On page 74, the Forest Service responds to comment advocating for inclusion of this area as a recommended Wilderness.

Mendicant Ridge: The Preferred Alternative does not include this area in your recommended wilderness, whereas Alternative D does. It is adjacent to The West Elk Wilderness western boundary and has the same wilderness characteristics. I spent 4 days two summers ago with my feet on the ground - from Bald Mt. Reservoir down the entire Mendicant Ridge; also from the Piburn Trail to Curecanti Creek down to Trail Creek Trail; and then back up to that trailhead. So I basically had a first-hand look along much of this recommended wilderness. Most of it border on the West Elk Wilderness land. As my hiking partner stated - "If this isn't wilderness, I don't know what is?".

Electric Mountain (P1-60), Mendicant (GP1a), and Lamborn (P7a) are included as recommended wilderness in alternative D of the EIS. The final wilderness analysis can be found in Chapter 3, Volume I of the final EIS, Designated and Special Areas, Recommended Wilderness section, and detailed notes for the evaluation of wilderness characteristics are in the project record. The final inventory, evaluation, and preliminary analysis in accordance with the FSH Chapter 70 Wilderness direction is located in the draft EIS, Appendix 6. III FEIS at 74.

The Forest Service completes its Wilderness Evaluation in Volume 1, Chapter 3, Part 2, Designated Special Areas, Recommended Wilderness. Within this evaluation, the Forest Service analyzes GP1a, GP1b, and GP1c in the Mendicant Ridge area, and includes several acres in the recommended Wilderness management area designation. However, these analysis areas do not include the proposal area originally included in the Community Conservation Proposal as well as my recommendations, which overlaps with the Mendicant Upper-tier Roadless Area boundary. Originally, this entire 27,68 acre parcel was included as Evaluation Polygon ID GP1, which was found by the Forest Service to have a High rating for wilderness characteristics. The FEIS fails to include a reasoning for why the area encompassed by the Mendicant Upper-tier Roadless Area is left out of inclusion as a recommended Wilderness management area designation.

Recommended Improvement: The Forest Service should include the full Mendicant Ridge Recommended Wilderness, as proposed by the Community Conservation Proposal, in the final forest plan.

#### D. CHALK MOUNTAIN/FLATTOP WILDLIFE MANAGEMENT AREA BOUNDARIES SHOULD BE CHANGED

The Chalk Mountain/Flattop Wildlife Management Area, located north of the towns of Hotchkiss and Paonia, is an incredibly important area for wildlife. The Forest Plan accurately reflects this area as a Wildlife Management Area. Chalk Mountain offers diverse ecosystems, in large part due to its topographic variety, ranging from below 9,000 feet up to 11,146 feet at Chalk Mountain, the most prominent feature in this unit. On the eastern face of Chalk Mountain, a large slump exposes very well defined sandstone and shale bedding of the Tertiary Green River Formation. The ecology of this area consists of aspen forests mixing into spruce-fir conifer forests, with large open park meadows that offer wetlands, beaver ponds, and a number of creeks that traverse or begin in this unit, including Buzzard Creek, Willow Creek, Dyke Creek, and West Muddy Creek.

The Forest Plan combines two Roadless areas, the Flattops/Elk Park Roadless Area and the Currant Creek Roadless Area, into one large 86,000 acre WMA, the largest WMA across the entire Forest, and approximately 40,000 acres larger than the second largest WMA. In doing so, we believe that this skews the route density for this area, as most of the roads and trails across this polygon exist in the Flattops/Elk Park Roadless Area. Splitting this Wildlife Management Area into two WMAs would avoid this problem. Recommended Improvement: The Forest Service should split this Wildlife Management Area up into two separate WMAs at the Roadless Area boundary.

Electric Mountain: Electric Mountain area should be considered as a HIGH degree of wilderness characteristics. Your evaluation came up with Moderate. I recommend it be included as recommended wilderness. It certainly has the naturalness. The only trail that cuts through from west to east does allow Mechanized Vehicles, but due to its ruggedness and difficulty, it doesn't seem to get any of that activity once you get into the current actual roadless area. The area is surrounded by private lands and infrastructure - such as FR701. But those would be outside the boundaries of this area. Likewise, the only cherry-stemmed road that I see on the map is just outside the roadless area. Your evaluation does mention improvements such as fences and ponds and ditches. But they, as you note, do not distract from the naturalness of the landscape as a whole.

Chalk Mountain and Elk Park: The Chalk Mountain area and part of the Elk Park area are not included in the Preferred Alternative recommended wilderness. They are included in Alternative D. Chalk Mt area is bordered on every side with either trails or forest roads that form a perfect boundary for the rugged Chalk Mountain area. In my frequent travels here, I've observed no evidence of access of motorized or mechanized vehicles along this entire route. In fact, it is tough enough to just hike into this remote place. It certainly contains all the criteria for HIGH wilderness consideration. Likewise, I've explored along the Elk Park Trail west of Overland Reservoir up to the ridge line above the Leroux Creek drainage. It also seems to contain a HIGH degree of wilderness qualities. It is the source of the Main, Middle and West branches of Hubbard Creek - an important water source for the North Fork Valley. It is rugged country, with very little, if any, access once you get off the Elk Park Trail. Both Chalk Mountain and Elk Park should be considered recommended wilderness.

McClure Pass/Munsey Ruby Stock trail:

The Preferred Alternative includes a small section of this trail in your Recommended Wilderness, whereas Alternative D includes a much larger portion. I support your Alt. D recommendation. This narrow strip of land would be adjacent to the current Ragged Wilderness land, and just to the east of The Ragged Trail. It shares the same characteristics as the adjacent wilderness.

The GMUG's preferred plan includes a mere 46,200 acres of recommended wilderness - and most of that is in the northern San Juan Mts. I feel this is highly inadequate. Local community groups provided detailed input in the Forest's Draft planning stages, which included a recommendation of an additional 340,000 acres for wilderness protection, None of these are near towns or wildlife urban areas. I've hiked countless mile in the Coal Mountain, Mendicant Ridge, Electric Mt, Elk Park, etc... areas and none of these areas are included in the GMUG plan. Each time I've ventured into these and similar areas I experience a great feeling of wilderness-like characteristics - solitude, wildlife, scenic wonders, and no evidence of human infrastructure. Our wilderness-like areas are worth protecting and this plan does not come close. And this is especially true during the times when climate change is becoming more and more of an serious problem

This is the perfect opportunity to adopt community supported conservation protections while helping the nation reach the goal for protecting 30% of our lands and water by 2030, a priority of the Biden administration. While currently 19% of the GMUG is protected as wilderness, many of the forest remains unprotected by wilderness or other land designations. The preferred alternative's 46,000 acres of additional recommended wilderness is a small reflection of lands that should be recommended. Our Wilderness resources in the North Fork are worth protecting, and GMUG Forest must prioritize these resources before they are lost forever. The Forest Service does not adequately consider the designations in the Gunnison Public Lands Initiative (GPLI) or Community Conservation Proposal. Takeaway: These must be better reflected - and incorporated - in the final plan - especially due to the threat of Climate Change. Gunnison, Ouray, San Miguel, and Hinsdale Counties united to submit a letter to the GMUG stating that "at this time we cannot support the pre-Draft plan and Preferred Alternative B as presented." One of their four reasons they stated was the lack of management policies related to Carbon Sequestration. According to the GMUG DRAFT EIS Volume 1. Page 90

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