

High Country Conservation Advocates • Defenders of Wildlife • The Wilderness Society • Conservation Colorado • Western Slope Conservation Center • Western Colorado Alliance • Rocky Mountain Wild • Great Old Broads for Wilderness • Wilderness Workshop • Western Environmental Law Center • Sheep Mountain Alliance

April 5, 2021

Chad Stewart  
Forest Supervisor, GMUG National Forest  
2250 Highway 50  
Delta, CO 81416  
[chad.stewart@usda.gov](mailto:chad.stewart@usda.gov)

Frank Beum  
Regional Forester, Rocky Mountain Region  
1617 Cole Blvd., Building 17  
Lakewood, CO 80401  
[frank.beum@usda.gov](mailto:frank.beum@usda.gov)

Dear Forest Supervisor Stewart and Regional Forester Beum,

The Grand Mesa, Uncompahgre, and Gunnison National Forest (GMUG) is revising its forest plan, with a Draft Plan/Draft Environmental Impact Statement scheduled to be released this summer. There is a once-in-a-generation opportunity on the 3.16-million acre GMUG to proactively tackle biodiversity loss, climate change, equitable access, and other issues so important to Coloradans and the forest's many visitors. Meeting these challenges is at the heart of the nation's 30x30 commitment, and we offer this letter to highlight how the GMUG revision process could provide a pathway in Colorado for achieving meaningful conservation outcomes. We respectfully request you consider how the GMUG planning process can further 30x30 goals.

On January 27, 2021, President Biden issued Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*, which committed his administration to the ambitious conservation goal of protecting 30 percent of U.S. lands and waters by 2030. Colorado's Senator Michael Bennet and Congressman Joe Neguse are original cosponsors of the 30x30 resolution in Congress, and Congresswoman Diana DeGette, Senator John Hickenlooper, and many others have expressed support. In fact, on March 16, 2021, 116 members of Congress sent a bipartisan, bicameral letter to President Biden in support of the national 30x30 goal in order to slow the loss of habitat and prevent the collapse of natural systems.<sup>1</sup> Community groups, such as those engaged in GMUG Forest Plan revision and signatories to this letter, are also building a groundswell of enthusiasm for implementation of the 30x30 vision on Colorado's Western Slope.

The U.S. Geological Survey reports that only 12 percent of U.S. lands are permanently protected, and only about 10 percent of Colorado is conserved with permanent or otherwise durable land protections

---

<sup>1</sup> See

<https://naturalresources.house.gov/imo/media/doc/Grijalva%20Blumenthal%20Neguse%20Lujan%20Bicameral%2030x30%20EO%20Letter%20March%202016%202020.pdf>.

managed for biodiversity.<sup>2</sup> With those stark numbers in mind, the GMUG Forest Plan revision process presents a path to further ecosystem resilience and integrity, combat climate change, and ensure that the beauty and naturalness of Colorado remain accessible to all for future generations.

The signatories to this letter developed and are garnering support for the *Community Conservation Proposal*, a vision for landscape-level protection consisting of specific wilderness and special management area recommendations that was submitted to the GMUG in 2018.<sup>3</sup> Protecting and connecting diverse undeveloped areas like those in the *Community Conservation Proposal* is an important action that agencies can take to enhance climate change adaptation and safeguard biodiversity. ***Protection of diverse ecosystem and habitat types through wilderness and other designations*** is a cornerstone of regional, national, and international efforts to conserve biological diversity, ecological processes of natural ecosystems, and carbon strongholds to combat climate change.

A key part of the revision process is its determination of which lands the Forest Service will recommend to Congress for wilderness designations. The GMUG has stated that “[t]here is a need, per requirements of the 2012 planning rule, to consider additional areas for designation including areas suitable for inclusion in the National Wilderness Preservation System . . . and to review existing information to evaluate what opportunities have been identified in the area and what needs could be met with other special designations.”<sup>4</sup> Designating wilderness and special management areas to protect national forest lands with high conservation values, such as those identified in the *Community Conservation Proposal*, is an important tool afforded the Forest Service under the agency’s planning regulations and reflects widespread public support for conserving our wild forests.

Lands protected under the Colorado Roadless Rule allow for limited energy development and motorized recreation, including the possibility of motorized trail construction. A more permanent level of protection for these areas is needed. And while 19 percent of the GMUG is protected as wilderness and therefore already contributing to 30x30 goals, many of the Forest’s ecosystems are underrepresented in the National Wilderness Preservation System (NWPS). ***For protected areas to conserve genetic, species, and community diversity – as well as the composition, structure, function, and evolutionary potential of natural systems – they must encompass a full variety of ecosystems.*** Indeed, protecting ecosystem diversity is a central purpose of forest planning under the 2012 planning rule:

Plans will guide management of [National Forest System] land so that they are ecologically sustainable and contribute to social and economic sustainability; consist of ecosystems and watersheds with ecological integrity and diverse plant and animal communities; and have the capacity to provide people and communities with ecosystem services and multiple uses that provide a range of social, economic, and ecological benefits for the present and into the future.<sup>5</sup>

---

<sup>2</sup> United States Geological Survey, Gap Analysis Project, Protected Area Database of the United States 2.1 (2020). See <https://www.doi.gov/pressreleases/fact-sheet-president-biden-take-action-uphold-commitment-restore-balance-public-lands>.

<sup>3</sup> See [www.gmugrevision.com](http://www.gmugrevision.com).

<sup>4</sup> U.S. Dept. of Agriculture, *Grand Mesa, Uncompahgre, and Gunnison National Forests Revised Draft Forest Assessments: Designated Areas*, 48 (March 2018).

<sup>5</sup> 36 C.F.R. § 219.1(c).

To provide the Forest Service with what we believe to be the best available science on this issue, The Wilderness Society in 2016 conducted an analysis of ecosystem representation in the NWPS at the national- and forest-level scales.<sup>6</sup> ***That analysis shows that the NWPS suffers from a significant under-representation of many ecosystems.*** Specific to the GMUG National Forest, this analysis found that only 11 of the 47 ecosystem types found on the GMUG are adequately represented in wilderness on the forest level.<sup>7</sup> The story is even more extreme on the federal level, with only 7 out of the 47 ecosystems showing adequate representation.<sup>8</sup> Underrepresented ecosystems on the forest level cover over 58% (1,718,474 acres) of the GMUG, with federally underrepresented ecosystems spanning over 41% (742,213 acres) of the GMUG.

A majority of the GMUG's Colorado Roadless Areas (CRAs) contain high proportions of inadequately represented ecosystems at both the forest-level and national scales.<sup>9</sup> Additionally, all the CRAs contain at least one underrepresented ecosystem. Out of the 76 CRAs on the GMUG, over half of the units are mostly (>50%) composed of underrepresented ecosystems on both forest and federal levels. Additionally, over 550,000 acres of the 900,100 acres of CRAs on the forest have ecosystems that are underrepresented on forest and federal levels.

In many instances, the addition of one CRA would elevate ecosystems into adequate representation.<sup>10</sup> For example, adding Kannah Creek CRA into the NWPS would elevate the Inter-Mountain Basins Mat Saltbush Shrubland into adequate representation (>20% representation). Even one of the more prevalent ecosystems on the GMUG, the Colorado Plateau Pinyon-Juniper Woodland, could achieve adequate representation with the addition of three CRAs (Kannah Creek, Sunnyside, and Kelso Mesa). In addition to these ecosystems, seven others could achieve adequate representation on the forest level with the addition of one CRA.

Notably, many under-represented ecosystem types on the GMUG are also some of the most common.<sup>11</sup> The most prevalent ecosystem on the GMUG, the Rocky Mountain Aspen Forest and Woodland, covers over 17% (524,280 acres) of the GMUG but is underrepresented on both forest and federal levels. Four other ecosystems span over 100,000 acres of the forest but are inadequately represented on forest and federal levels and include the Rocky Mountain Gambel Oak-Mixed Montane Shrubland, the Rocky Mountain Lodgepole Pine Forest, the Inter-Mountain Basins Montane Sagebrush Steppe, and the Colorado Plateau Pinyon-Juniper Woodland.

It was disappointing that the GMUG planning team recommended only 22,400 acres across the entire GMUG for wilderness designation in the agency's 2019 Working Draft, all of it in areas contained within the San Juan Wilderness bill component of the Colorado Outdoor Recreation and Economy (CORE) Act. This ignores tens of thousands of acres that were recommended by the GMUG itself in 2006 in the last

---

<sup>6</sup> Appendix 1; Dietz et al. 2015; Belote et al. 2015.

<sup>7</sup> Appendix 1: Table 3, Tabs 1 & 2.

<sup>8</sup> Appendix 1: Table 3, Tabs 1 & 3.

<sup>9</sup> Appendix 1: Tables 1 & 2; Maps 2 & 3.

<sup>10</sup> Appendix 1: Table 4.

<sup>11</sup> Appendix 1: Table 3, Tabs 2 & 3.

public revision process, as well as widely supported endeavors such as the *Community Conservation Proposal* and *Gunnison Public Lands Initiative*.<sup>12</sup> There is still time for the GMUG to include these science-based and widely supported proposals in its preferred alternative in the draft plan. We hope the draft plan provides a significant improvement over the working draft with a range of proposed designations and management prescriptions that will contribute to biodiversity conservation, wildlife habitat connectivity, climate adaptation, and ecosystem representation consistent with the requirements of the 2012 planning rule. The GMUG plan has great potential to be a model for how planning can be an important vehicle for achieving 30x30.

President Biden's executive order directing federal officials to protect 30 percent of the country's lands and waters by 2030 will be a key part of America's effort to slow the species extinction crisis and curb global warming. We urge the Forest Service to incorporate conservation measures consistent with the 30x30 vision in its planning efforts. The GMUG Forest Plan revision process provides that pathway to a more sustainable, resilient, and biologically diverse future through new wilderness and special management area recommendations.

Thank you for your consideration.

Matt Reed  
Public Lands Director  
High Country Conservation Advocates  
PO Box 1066  
Crested Butte, CO 81224  
[matt@hccacb.org](mailto:matt@hccacb.org)

Beau Kiklis  
Public Lands Advocate  
Conservation Colorado  
1536 Wynkoop St. #510  
Denver, CO 80202  
914.330.3993  
[beau@conservationco.org](mailto:beau@conservationco.org)

Robyn Cascade  
Broadband Leader, Northern San Juan Chapter  
Great Old Broads for Wilderness  
c/o PO Box 2924  
Durango, CO 81302  
970.385.9577  
[northernsanjuanbroadband@gmail.com](mailto:northernsanjuanbroadband@gmail.com)

Jim Ramey  
Colorado State Director  
The Wilderness Society  
1660 Wynkoop St., Unit 850  
Denver, CO 80202  
720.647.9667  
[jim\\_ramey@twso.org](mailto:jim_ramey@twso.org)

Nick Allan  
Community Organizer  
Western Colorado Alliance  
2481 Commerce Blvd.  
Grand Junction, CO 81505  
719.310.9345  
[nick@westerncoloradoalliance.org](mailto:nick@westerncoloradoalliance.org)

---

<sup>12</sup> See <https://www.gunnisonpubliclands.org/>.

Juli Slivka  
Conservation Director  
Wilderness Workshop  
P.O. Box 1442  
Carbondale, CO 81623  
970.963.3977  
[juli@wildernessworkshop.org](mailto:juli@wildernessworkshop.org)

Ben Katz  
Public Lands Program Director  
Western Slope Conservation Center  
PO Box 1612  
Paonia, CO 81428  
203.521.5134  
[ben@theconservationcenter.org](mailto:ben@theconservationcenter.org)

Kelly Nokes  
Shared Earth Wildlife Attorney  
Western Environmental Law Center  
P.O. Box 218  
Buena Vista, CO 81211  
575.613.8051  
[nokes@westernlaw.org](mailto:nokes@westernlaw.org)

Lexi Tuddenham  
Director  
Sheep Mountain Alliance  
218 W. Colorado Ave #B  
Telluride, CO 81435  
970.728.3729  
[lexi@sheepmountainalliance.org](mailto:lexi@sheepmountainalliance.org)

cc:  
Samantha Staley  
GMUG Forest Planner  
[Samantha.j.staley@usda.gov](mailto:Samantha.j.staley@usda.gov)

Lauren McCain  
Senior Federal Lands Policy Analyst  
Defenders of Wildlife  
600 17<sup>th</sup> St., Suite 450N  
Denver, CO 80202  
720.943.0453  
[lmccain@defenders.org](mailto:lmccain@defenders.org)

Alison Gallensky  
Principal Conservation Geographer  
Rocky Mountain Wild  
1536 Wynkoop St., Suite 900  
Denver, CO 80202  
303.546.0214x9  
[alison@rockymountainwild.org](mailto:alison@rockymountainwild.org)

Sherry Schenk  
Grand Junction Area Broadband  
Great Old Broads for Wilderness  
379 Ridge View Drive  
Grand Junction, CO 81507  
970.596.8510  
[gjbroads2008@gmail.com](mailto:gjbroads2008@gmail.com)