



April 10, 2008

Mark Stiles  
San Juan Public Lands Center Manager  
15 Burnett Court  
Durango, CO 81301

Dear Mark,

We are pleased to offer the following comments on the draft San Juan Public Lands Center management plans with our joint suggestions for future management of the Hermosa and Bear Creek watersheds. Please reference the attached map for more precise description of our boundaries.

The Hermosa watershed encompasses one of Colorado's largest and most biologically diverse forests, including at least 17 separate ecosystems, ranging from rocky scrub oak and pinyon-juniper at lower elevations to aspen, spruce, and fir. Tracts of virgin timber exist at elevations as low as 7,000 feet, well below the typical elevation of most protected forested areas in Colorado. Hermosa contains some of the largest stands of old-growth ponderosa pine remaining in the San Juan Mountains. Hermosa Creek's tributaries host thriving populations of native Colorado River cutthroat trout. One of Hermosa's most compelling attributes is the large majority of the watershed is roadless and generally unimpacted by past human activities.

Together, San Juan Citizens Alliance, Trails 2000 and The Wilderness Society represent thousands of residents across southwest Colorado. Our collective memberships utilize the Hermosa watershed for a multiplicity of recreational activities include hiking, cycling, horsepacking, skiing, hunting and fishing. Our members also highly value the Hermosa watershed for its exceptional ecological resources noted above. Because of this shared appreciation of Hermosa's values gained from personal recreational experiences combined with a desire to maintain Hermosa in a wild and pristine condition for generations to come, we have jointly crafted a management proposal for your consideration in the San Juan National Forest plan revision.

Our longer-term intention is to translate this proposal into formal legislation with the support of our congressional delegation in order to obtain permanent protection for the

resources and activities described. This permanent legislative protection would take the form of a designation applied to the entire Hermosa watershed with smaller wilderness units contained within it.

### **1) Manage the entirety of the Hermosa watershed as a single landscape**

We propose that essentially all of the Hermosa Creek watershed as defined by its hydrologic boundary be managed for a single, focused management purpose that preserves and restores its watershed integrity while maintaining and enhancing backcountry recreation opportunities. This landscape management unit might be variously called the “Hermosa Watershed Protection Area,” the “Hermosa National Conservation Area,” the “Hermosa Scenic Area” or some other iteration. This designation would be legislated permanent protection for the Hermosa watershed with specific management direction spelled out in the legislation, including two distinct wilderness units managed according to the Wilderness Act.

The area would be defined by the Hermosa hydrologic boundary described generally as the Colorado Trail/Hermosa Creek-Dolores River watershed boundary on the west; Hotel Draw/Bolam Pass/Graysill Mountain on the north; the public-private boundary along Highway 550 on the east; and the Junction Creek Road to the south. We intend that the boundary be pulled back far enough from Falls Creek subdivision to accommodate necessary fuels reduction or other wildlife prevention activities. Our boundary incorporates the majority of the Hermosa inventoried roadless area, but also previously logged and roaded lands in the Hermosa headwaters in Hotel Draw and on Graysill Mountain, for example. We initially propose excluding the Durango Mountain Resort permit area and using the extent of its current permit boundary as our unit boundary, pending further discussions with DMR.

### **2) Incorporate the entirety of Bear Creek watershed into the management unit**

In addition to the Hermosa watershed, we incorporate the entire length of the Bear Creek valley into the management unit. This retains the concept of large landscape protection that underlies the Forest Service’s draft proposal for a West Hermosa Wilderness, which combined the Hermosa watershed with the headwaters of Bear Creek and of the West Fork of the Mancos River into a single unit. Our Bear Creek component is generally described as the rims of the valley on north and south, running from the confluence of Bear Creek with the Dolores River all the way upstream to its headwaters including Sharkstooth and Centennial Peak.

### **3) Designate wilderness within the larger management landscape**

Within the larger management landscape of the Hermosa Watershed Protection Area or Hermosa National Conservation Area, we recommend a **West Hermosa Wilderness**. The proposed West Hermosa Wilderness is defined by the Colorado Trail on the west, the Corral Draw Trail on the north, Hermosa Creek on the east, the watershed divide between Buck Creek and Tripp Creek on the south, and the Junction Creek Road to the southwest. We specifically propose to omit from the wilderness the Colorado Trail, Corral Draw Trail, and main Hermosa Creek Trail, while specifically including the Clear Creek Trail,

South Fork of Hermosa Creek Trail, Big Bend Trail, Salt Creek Trail, and Neglected Trail.

#### **4) Require Travel Management Planning to designate motorized/non-motorized routes**

Specific trail designations would be formally determined in ongoing or future travel management planning. Recommended trail designations include:

- a) retain non-motorized designation of the Colorado Trail (i.e., foot, horse, bicycle);
- b) change Corral Draw Trail to non-motorized;
- c) include Clear Creek Trail, South Fork of Hermosa Creek Trail, Big Bend Trail, Salt Creek Trail, and Neglected Trail in Wilderness (i.e., foot, horse travel only);
- d) retain non-motorized designation of Sharkstooth Trail, upper Bear Creek Trail, Owens Basin Trail, Grindstone Loop Trail, lower Morrison Trail and West Fork of Mancos Trail (east of its junction with the Owens Basin Trail).
- e) change lower Bear Creek Trail, and the sections of Gold Run, Little Bear, and Grindstone Trails within Bear Creek canyon (below the rim) to non-motorized;
- f) retain existing designation for main Hermosa Creek Trail;
- g) retain existing designations for Jones Creek Trail and Dutch Creek Trail;
- h) retain Elbert Creek Trail and Little Elk Creek Trail as non-motorized;
- i) retain Pinkerton Flagstaff trail north of Dutch Creek Trail junction as non-motorized.

#### **5) Create a watershed restoration objective for headwaters areas**

Our recommended management designation incorporates areas in the Hermosa Creek headwaters that have experienced past development activities, including logging, road construction, and mining. These areas located generally in Hotel Draw, Bolam Pass, and Graysill Mountain are targeted for watershed restoration activities that might include road removal and restoration, more intensive forest revegetation and planting, and abandoned mine reclamation. Incorporating these areas into the management unit provides for the enhancement of the overall watershed function and integrity, and highlights them for future funding opportunities.

#### **6) Wild and Scenic River designation for Hermosa Creek and tributaries**

Our recommended management includes the proposed Wild and Scenic River designation for the 62 miles of Hermosa Creek and its tributaries as recommended in the draft Forest Plan.

### **SPECIFIC FOREST PLAN MANAGEMENT RECOMMENDATIONS**

The foregoing describes the overall desired future conditions we envision for the Hermosa/Bear Creek watershed. In terms of translating this proposal into Forest Plan management prescriptions, we suggest that the entire Hermosa/Bear Creek watersheds be labeled as a Theme 2 Management Area, with specific desired future conditions spelled out as described previously. Within this overall Theme 2 Management Area, the translation of our larger vision requires additional specific management decisions in the Forest Plan, as follows:

- 1) Theme 2 management area prescription for entire Hermosa watershed plus Bear Creek**, with management recommendations/desired future condition as described above.
- 2) Recommended Wilderness designation for West Hermosa**, with boundaries as detailed previously.
- 3) Over-ground travel categories** – no opportunity areas would be available within the Theme 2 area, and motorized opportunity zones would be limited to those trails specifically highlighted for motorized use.
- 4) Hermosa Creek Wild and Scenic Recommendation** – retained as proposed in the draft plan.
- 5) Off-limits to oil and gas leasing** – entire Theme 2 Management Area would be administratively unavailable for mineral leasing.
- 6) Withdraw from mineral location** – entire Theme 2 Management Area would be proposed for administrative withdrawal from mineral location (1872 Mining Law).
- 7) Remove from suitable timber base** – entire Theme 2 Management Area would be not be included in the suitable timber base, although non-roadless portions could potentially still be accessible for fuel reduction and other specific purposes.

We appreciate the extended public comment period that made possible our joint comments for the Hermosa watershed. We look forward to working with you and your staff in refining these recommendations for incorporation into your final plan.

#### **Remaining unresolved issues**

We also discussed intensively the prospect of a wilderness unit on the east side of Hermosa Creek. We were unable to reach a definitive agreement for this proposed wilderness in the time allotted for public comment on the plan. The proposed East Hermosa Wilderness would be generally defined by the Elbert Creek Trail (the Big Lick Creek segment) on the north, the main Hermosa Creek Trail on the west, the Dutch Creek Trail on the south, and the Pinkerton Flagstaff Trail on east. The wilderness would consist primarily of the Elk Creek and Little Elk Creek drainages, for a total of 18,187 acres. However, because we were unable to involve several key stakeholders in these discussions, we could not agree on a final recommendation for the proposed East Hermosa Wilderness. San Juan Citizens Alliance and The Wilderness Society will be offering separate comments in support of this wilderness unit, while Trails 2000 declines to endorse it at this time.

**Conclusion:** Our proposed Hermosa/Bear Creek watershed management unit encompasses about 142,000 acres, including an agreed West Hermosa Wilderness that consists of about 43,817 acres according to our GIS figures, as compared with the draft proposal for 50,895 acres.

Our proposal keeps the Colorado Trail, Corral Draw Trail, and upper Bear Creek Trail available for non-motorized recreation activities including mountain biking. Our proposal

incorporates the Clear Creek Trail (among others) into the proposed wilderness and removes it from future mountain bike use.

We believe this proposal is a realistic compromise that accommodates existing recreational activities while providing for permanent protection of Hermosa's wilderness values.

Sincerely,

A handwritten signature in cursive script that reads "Mark Pearson".

Mark Pearson  
Executive Director  
San Juan Citizens Alliance

Mary Monroe  
Executive Director  
Trails 2000

Michael Carroll  
Associate Director  
Wilderness Support Center  
The Wilderness Society