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BOARD OF COUNTY COMMISSIONERS

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September 5, 2018

Samantha Staley
Grand Mesa Uncompahgre and Gunnison National Forest All Units
2250 South Main Street, Delta, CO, 81416
via email to: samanthajstaley@fs.fed.us

RE: Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision #51806: Draft Wilderness Evaluation

Dear Responsible GMUG officials,

Thank you for this opportunity to provide comments on the Draft Wilderness Evaluation dated August 6, 2018.

While the period to review the Draft Wilderness Evaluation and provide these comments has only been open for 30 days, and we have been consumed with many other issues during this time that compete for our small county's attention, one of our Board members was able to attend the webinar held on August 7, as well as review the published materials, and draft these comments on behalf of the County. Commissioner Tisdell has additionally become familiar with many of the areas studied in the Draft Evaluation through years of backpacking and hiking through the existing Wilderness areas as well as through those areas evaluated here. These comments are based on this on-the-ground experience and a thorough review of the published evaluation documents, as well as a thorough understanding of current county-based concerns including watershed and forest health matters; wildfire matters; existing and potential water infrastructure; road issues including OHV use and winter travel; weed control; evolving private property use and ownership patterns; and many other matters relating to the US Forest Service lands that we become familiar with during the normal course of conducting County business. In addition, the County has received testimony from Ouray County citizens and businesses regarding the merits of many of the parcels in the Draft Wilderness Evaluation.

We have previously commented on the draft Forest Assessments; Wilderness Inventory; and Wilderness Criteria, the draft scoping materials; and are pleased to provide these comments on draft Wilderness Evaluation.

In producing today's comments, we have tried to keep in mind the purpose and organization of the evaluation materials and the framing questions posed by GMUG during the webinar and in the draft evaluations, as summarized here:

- I. Are the narratives clear, and do they reflect the considerations outlined in the criteria?
- II. Does each narrative include all relevant information available?
- III. If you have personal experience with a particular area / polygon evaluated in the materials, what are those experiences?

Ouray County's comments are as follows, with reference to particular polygon identifications per the draft evaluations.

Our comments will be contained to the following polygons in the draft evaluation:

Polygon Number	Polygon Name	Acres	Draft Evaluation Rating	Ouray County Rating	Ouray County Concerns
O5	Whitehouse Mountain	24,314	High	High	Conform Boundaries to SJMWB
O6	Leopard Creek	611	High	High	
O1-NW	Cimarron Ridge	16,919	Moderate	Moderate	
O1-SW	Owl Creek	7,094	Moderate	Low	Water Infrastructure
O1-E	Turret Ridge	6,156	High	High	
O2	Baldy Mountain	2,973	Moderate	Moderate	
O3	Amphitheatre	8,598	Moderate	Low; High	Break into two Areas for analysis
O4	Hayden Mountain	9,018	Moderate	Low	County Roads, Active Mining,
O7	Dave Wood	9,264	Moderate	Moderate	
OG1	Little Cimarron	26,163	Moderate	Moderate	
G27	Nellie Creek / Matterhorn	15,920	Moderate	High	Western isolated polygon should be High

Discussion of Ratings and Evaluation of Wilderness Characteristics

Polygon O5 Whitehouse Mountain

The Whitehouse Mountain polygon in the Draft Evaluation includes boundaries that have been modified in the current version of the San Juan Mountains Wilderness Bill. The current evaluation should reflect the newly revised boundaries within the Bill. We concur and strongly support the finding within the Draft Evaluation that this area should be ranked as High wilderness potential.

Polygon O6 Leopard Creek

While the overall acreage of this polygon is too small (less than 5,000 acres), this evaluation area's contiguity to the existing Mount Sneffels Wilderness Area, along with the other criteria found in the Draft Evaluation, should justify its rating as High.

Polygon O1-NW Cimarron Ridge

We would like to call attention to the noted existing water developments within this evaluation area. While the purpose of this Draft Evaluation phase of the Forest Plan Revision is only one of several steps toward possible eventual designation by Congress, we believe that it is important to highlight any and all water infrastructure at this point that would necessarily have to be taken out of any future steps towards actual designation. In this particular polygon, the Draft Evaluation points out the existing water infrastructure in the Southern portion. Where this would be called out in any eventual designation, and its other characteristics are analyzed, we would concur with the ranking of Moderate found in the Draft Evaluation.

Polygon O1-SW Owl Creek

In addition to the comments for Polygon O1-NW that concern existing water infrastructure, we believe that it is important to also highlight potential water infrastructure. There are potential water storage opportunities within this evaluation area, and due to that potential, we would suggest lowering the assessment for this polygon to a Low or No characteristic.

Polygon O1-E Turret Ridge

We concur with the rating contained in the Draft Evaluation.

Polygon O2 Baldy Mountain

The acreage of this evaluation area is less than the desired minimum size of 5,000 acres. In addition, existing grazing allotments exist within the area. We would suggest reducing the evaluation for this area to a designation of Low.

Polygon O3 Amphitheatre

This evaluation should be split into two separate evaluation areas. On the West side of the existing polygon, in addition to the noted uses, there is active rockfall mitigation to protect Highway 550. The rating for this West side should be reduced to Low. On the East side of the existing polygon, we agree that there is a very high degree of wilderness characteristics across all evaluation criteria.

Polygon O4 Hayden Mountain

This polygon exhibits many characteristics similar to Polygon N3, which earned a No Wilderness Characteristics rating. It contains or is adjacent to active mining, significant historic mining, designated county roads, water infrastructure, an active hydroelectricity facility, adjacent residential subdivision, and proximity to highway 550 on the eastern portion of this evaluation area. However, the portions of this polygon higher in elevation demonstrate high values of all wilderness characteristics. Therefore, we would suggest splitting both Polygons O4 (Hayden Mountain) and N3 (Bridal Veil) into two additional polygons and then going through a further evaluation. If that is done, we would expect that the higher elevation portions of both O4 and N3 might achieve Moderate, while the lower portions of each might also earn a Low or No.

In addition to these comments regarding Polygon 4, the same comments relevant to the boundaries of the San Juan Mountains Wilderness Bill ("the Bill") made above in reference to Polygon O5 are repeated here. The boundaries in the Bill have been updated, and the Draft Evaluation should reflect the boundaries in the current Bill. In line with our comments in the paragraph above, we feel that the current evaluation rating found in the Draft Evaluation materials is appropriate to be applied to this Southwestern portion of Polygon O4.

Polygon O7 Dave Wood / Spring Creek

We concur with the draft evaluation analysis for this polygon.

Polygon OG1 Little Cimarron

Does this area contain treatment areas designated under SPEADMR?

Polygon G27 Nellie Creek / Matterhorn

The furthest West section of this evaluation area should be rated as High rather than Moderate. It contains upper tier Roadless designation, was ranked as a High in the 2007 recommendations, and its other merits described in the Draft Evaluation should earn this isolated section of this polygon a High while the other non-contiguous sections of this polygon should remain as Moderate.

Ouray County wishes to thank you for the opportunity to comment on these vital elements of the Forest Plan Revision process.

Sincerely,



Don Batchelder
BOCC, Chair