

Grand Mesa, Uncompahgre, Gunnison National Forests
Attn: Forest Plan Revision Team
2250 S Main St
Delta, CO 81416

November 5, 2021

GMUG Forest Planning Team:

On behalf of the Ridgway Ouray Community Council (ROCC) please accept these comments on the GMUG Forest Plan. The Ridgway Ouray Community Council (ROCC) is a nonprofit community organization whose mission is to build, nourish and protect the healthy spirit of our community. ROCC is dedicated to quality of life issues that will help shape the future of Ouray County. We appreciate the opportunity to be a part of the GMUG planning process, and we recognize the huge scope and amount of work that has been invested by the USFS in the plan. Our comments focus on the plan components in and very close to Ouray County.

In 2021, the Ridgway Ouray Community Council (ROCC) collaborated with the Ouray Ranger District of the Uncompahgre National Forest and San Juan Mountains Association (SJMA) to allow volunteer citizens to provide Leave No Trace education and outreach at the Blue Lakes/Dallas Trail Head. The end of season report from the Public Lands Committee of ROCC summarized that at the County Road 7/Blue Lakes Trail Head, there were 35 volunteer shifts totaling 238 hours on 25 separate calendar dates between June 25 and September 11, 2021, staffed at the trailhead. The 36 volunteers contacted 638 backpackers, and 3,111 day hikers, and 508 dogs.

We would like to first make a general comment on the timber suitability maps in the plan. While we understand that the great increase in timber suitability on the maps does not equate (necessarily) to actual logging we strongly believe that timber suitability areas should not be allowed in Ouray County on slopes >40%; eliminating the timber suitability >40% removes most of production/harvest opportunities in the county. The ‘steepness’ of the terrain in Ouray County is implicit to the socioeconomic life of Ouray County – the residents and visitors are here (and contributing to the local economy) because of the views and opportunities to hike/drive/view/recreate in the surrounding terrain. The aspen forests along US550 and also along the north side of the Sneffels Range are amazingly beautiful and bring thousands of visitors; we can’t have the trees harvested, and we can’t have surrounding spruce/fir trees harvested either that would mar the views. In addition, the slopes above US550 south of Ironton drain into a biologically important Fen area – any timber harvest production has the potential to damage this area.

ROCC supports the following specific GMUG Forest Plan management options in Ouray County and Gunnison County:

- 1) CORE Act additions to the Mt Sneffels Wilderness. We support the inclusion of the CORE Act Recommended Wilderness areas both north and south of the existing Mt Sneffels Wilderness in Ouray and San Miguel Counties, as shown in Alternative B (the USFS

Preferred Alternative) of the plan. These areas are surprisingly and refreshingly remote given their proximity to more heavily used areas; the steepness of the trails and terrain protects them. We believe that the summer and winter Recreation Opportunity Spectrum (ROS) settings for the CORE Act additions should be kept at primitive non-motorized (to match the existing Wilderness settings) not downgraded to semi-primitive non-motorized as shown in AltB.

- 2) Blue Lakes/Blaine Basin. We do have particular concerns with the management of the over-used adjacent Blue Lakes area in the existing Sneffels Wilderness as well as the Blaine Basin area in part of the CORE Act Recommended Wilderness Area. The Blue Lakes issues have been commented on in the recent USFS Blue Lakes Visitor Study, and the USFS is working on developing a plan to deal with the overuse problems. The Blaine Basin trailhead is at the same location as the Blue Lakes Trailhead and only gets a small fraction of the use; even so the usage has seemed markedly increasing. It is an amazingly beautiful area – full of all sorts of wildflowers with a backdrop of Mt Sneffels and the adjacent Cirque Ridge - it needs to be proactively protected from overuse.
- 3) Bear Creek Addition to the Uncompahgre Wilderness. This 6,000 acre parcel includes the iconic Bear Creek National Recreation Trail and extends north from above the Engineer Pass Road to the high ridges above Ouray and the Bridge of Heaven, abutting the existing Uncompahgre Wilderness on its east side. The Bear Creek Trail is a spectacular place to hike as is the Bridge of Heaven Trail; even though these trails may look close to existing development on a map their steepness and the surrounding steep terrain result in a very remote experience. Some mining traces do remain (as in much of Ouray County) but they are of historical interest and do not detract from the “wilderness experience”. This area is also an important part of the habitat for the Tier 1 Cow Creek herd; bighorn sheep frequent the high ridges above Bear Creek as well as the high meadows and ridges above Ouray towards Bridge of Heaven. We do note that the Hard Rock 100 race traditionally comes through this area and thus we support giving them an exemption or permit to continue doing this. We believe that the summer and winter ROS settings for this area should be semi-primitive non-motorized.
- 4) Baldy Addition to the Uncompahgre Wilderness. This parcel is about 2,500 acres, north of the Bear Creek parcel and also adjacent to the Uncompahgre Wilderness to its east. This area is important habitat for deer, elk, and bighorn sheep and an important part of the high-to-low elevation linkage of winter and summer habitats. This area was proposed as a Wildlife Management Area in AltB - we have concerns that the trail mileage cap for WMAs could create problems for the existing well-used and maintained trails; we do not want to see these trails go away. We believe that the winter and summer ROS settings should be set to semi-primitive non-motorized.
- 5) Hayden parcel. This is an approximately 10,000 acre area on the west side of US550 (east of CR361 and north of Red Mtn Pass) encompassing the Mt Hayden Ridge. We believe that

this area could be General Forest as in AltB, but with strict protections. Although there is a lot of mine scarring and some old roads, it is in general extremely hard for people to get to – steep hikes as well as fewer maintained trails; this makes it more remote than on-map miles would imply. Even though the highway is visible it is far and steeply below. As locals know elk frequent the trees above Commodore Gulch and the benches north of Richmond Pass. We agree with the AltB Summer and Winter ROS as semi-primitive and the Scenic Integrity is High. This area, and the Bear Creek swath are really the largest, most remote, hard-to-get-to, and non-motorized areas left in Ouray County – we can't lose them. While there is some pressure for more trails across the county, the upper reaches of this entire area should be protected. We are supporting this area as General Forest with the understanding that it may be appropriate in the future for some sort of multi-use trail to be built on the lower parts of this parcel, relatively close to the existing US550.

- 6) Abrams parcel. This is a 3000 acre parcel proposed as General Forest in AltB. It is east of US 550 and includes jeep trails south of Engineer pass and west of Poughkeepsie Gulch. There is significant jeep usage in this area and it needs to be better monitored and maintained (keep people and jeeps off the tundra), but we think it makes sense to keep this area as General Forest. The winter ROS for this area in alt B is semi-primitive/motorized; we believe that winter snowmobile usage should be very strictly monitored and only on designated jeep roads (not cross-country). There is an existing Nordic area low down around the Ironton site and the grooming should be allowed to continue but no other snowmobile access. The moose population has increased in this area in the past few years and should be protected. We support the summer ROS as semi-primitive/nonmotorized in AltB (excludes existing roads). There are current issues with camping alongside US550 in the Ironton area and along the jeep roads and better practices need to be regulated/managed (vehicles on tundra, etc.). We are supporting this area as General Forest with the understanding that it may be appropriate in the future for some sort of camping area or bathrooms to be built on the lower parts of this parcel, relatively close to the existing US550. We do want to emphasize that the Ironton fen area needs to be carefully protected though.
- 7) Turret Ridge, Little Cimarron, and Failes Creek/Soldier Creek additions to the Uncompahgre Wilderness, as outlined in the Citizen Conservation Proposal. These 3 areas (~15,000 acres total) are all in Gunnison County (not Ouray County) but most easily accessed from the Ouray County side; many of our members camp, hike, and visit there. The Turret Ridge skyline is spectacular and part of the beautiful view from Ridgway. These 3 roadless areas are all adjacent to the existing Uncompahgre Wilderness and are habitat for elk, Lynx, and Moose as well as an important component part of the Tier 1 RBS-21 Bighorn Sheep winter range. The summer and winter ROS settings for the Turret Ridge area should be no less than semi-primitive non-motorized – there are no trails in this area. The settings for the other 2 areas should allow specific designated current use; some motorcycle and snowmobile usage as currently allowed but with specific designations (not just “No Restrictions” everywhere).

Again, ROCC thanks the GMUG Planning Team for the opportunity to participate in this process.

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