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November 21, 2021

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

The Ouray Trail Group (OTG) is pleased to provide the following comments on the GMUG Draft Forest Plan. OTG is a non-profit corporation of volunteers founded in 1986, dedicated to the preservation and safe public use of Ouray County's non-motorized trails. Our members take a stewardship role in protecting, preserving, and maintaining the natural and recreational resources we all enjoy. We appreciate the opportunity to be a part of the GMUG planning process, and we recognize the amount of work that has been invested by the USFS in the plan. Our comments focus on the plan components in and near Ouray County.

OTG does volunteer work on non-motorized trails in the Ouray Ranger District of the Uncompahgre National Forest, under a long-standing MOU and Volunteer Service Agreement with the Ouray Ranger District. We coordinate trail maintenance and sign work with USFS, publish a hiking guide, maintain a website, maintain trail registers, and organize trail workdays and training for our volunteers and school students. OTG volunteers recorded 2,654 hours on USFS-related work in 2021, and at least 1,000 additional hours on OTG administration, meetings, fundraising, map development and sales, trail reconnaissance, and other tasks that support OTG's mission. In addition, the Ouray County Nordic Council is a division of OTG.

Our comments on the Management Plan are guided by two principles:

1) We support the continued existence and regular maintenance of the existing named and maintained non-motorized trails in the Mountain Division of the Ouray Ranger District, our area of concern.

2) We support maintaining a high-quality hiking experience in our area of concern that includes natural scenic values. To that end, we support Plan decisions that maintain or enhance a natural and non-motorized appearance and experience for hikers.

OTG supports Alternative B in the Draft Plan, with the following exceptions and clarifications.

1) Timber suitability maps. We believe that areas of Ouray County with slopes >40% should not be included as suitable for timber harvest. The steep forested terrain typical of much of the National Forest land in Ouray County is a vital part of the scenic values that are essential to the high-quality hiking experiences enjoyed by residents and visitors and contribute to our local economy. The aspen and conifer forests along US550 and the north side of the Sneffels Range are amazingly beautiful, and commercial timber harvest in these areas would unacceptably impact the hiking experience.

2) ROS settings in CORE Act additions to the Mt Sneffels Wilderness. We support the inclusion of the CORE Act Recommended Wilderness areas north and south of the existing Mt Sneffels Wilderness, as included in Alternative B. However, Alternative B specifies Recreation Opportunity Spectrum (ROS) settings for these areas in winter and summer as semi-primitive non-motorized. We believe that the ROS settings for the CORE Act additions should be primitive non-motorized, to match the existing Wilderness settings and help to protect the wilderness character of the additions.

3) Bear Creek Parcel. Alternative D of the Plan recommends wilderness designation for this 6,000-acre parcel north of Engineer Pass Road to the high ridges above the Ouray Amphitheater and the Bridge of Heaven, adjoining the existing Uncompahyre Wilderness. Alternative B of the Plan designates this area as General Forest. OTG supports designating this area as a Special Management Area (SMA) emphasizing non-motorized recreation and protection of natural scenic values. We agree with the summer and winter ROS settings for this area designated in Alternative B. The spectacular Bear Creek National Recreation Trail is within this area, a historic mining trail that was rediscovered and restored by OTG in the 1980s and is now one of the most popular hiking trails in the Ouray area. The Horsethief Trail leading to the Bridge of Heaven and beyond to the Uncompahyre Wilderness is also popular, and both trails offer users spectacular views of natural mountain scenery with a remote feel despite the area's proximity to the US550 corridor. We estimate from trail register data that in 2021 over 6,000 hikers used the Bear Creek NRT and 2,800 hikers and equestrians used the Horsethief Trail.

4) Baldy Addition to the Uncompahgre Wilderness. This parcel is about 2,500 acres adjacent to the Uncompahgre Wilderness. This area is an important part of the high-to-low elevation linkage of winter and summer habitats for deer, elk, and bighorn sheep. Existing trails are well-used by hikers, equestrians, and hunters. This area is proposed as a Wildlife Management Area (WMA) in Alternative B, but we support designation of this area as recommended for wilderness. We believe that the winter and summer ROS settings should be set to semi-primitive non-motorized.

5) Hayden parcel. This approx. 10,000-acre area encompasses the Mt Hayden Ridge west of US550 and east of CR361. We support General Forest designation as in Alternative B, but with added protections. Because of steep terrain and few maintained trails this area is less visited and provides a remote user experience. The area is also close to the US550 corridor where increasing recreation use, commercial outdoor recreation, and private land development are exerting ever more pressure on wildlife resources and natural scenic values. We agree with the

Alternative B Summer and Winter ROS as semi-primitive non-motorized. We would like land use decisions in the Hayden Ridge area to constrain recreation development to lower elevations near the US550 corridor, and leave the higher elevations undeveloped to protect the natural scenic values and remote setting.

6) Abram parcel. This 3,000-acre area is proposed as General Forest in Alternative B. It is east of US 550 and includes 4-wheel drive roads south of Engineer Pass and west of Poughkeepsie Gulch. We support keeping this area as General Forest as in Alternative B. The summer ROS for this area is semi-primitive non-motorized, with motorized use allowed on existing roads. The winter ROS for this area in Alternative B is semi-primitive motorized. We believe that winter snowmobile use should be allowed only on designated routes (not cross-country). Snowmobile grooming by the Ouray County Nordic Council should be allowed to continue on the Ironton Nordic Trail System, but other recreational snowmobile access in Ironton Park should not be permitted. We strongly support current USFS efforts to work with Ouray County to improve management of camping and OHV use in this area to address growing land and resource degradation issues.

7) Turret Ridge additions to the Uncompany Wilderness. The Citizen Conservation Proposal includes recommended wilderness for the Turret Ridge parcel, a roadless area adjoining the existing Uncompany Wilderness between the West and Middle Forks of the Cimarron River. This area can be seen from the Middle Fork Trail and many vantage points on the higher ridges in the area, and OTG supports recommended wilderness for this parcel to protect the natural scenic views for hikers and trekkers on the ridges. We ask that the summer and winter ROS settings for the Turret Ridge area be no less than semi-primitive non-motorized.

OTG thanks the GMUG Planning Team for the opportunity to participate in this process.

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