

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

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Mr. Chad Stewart:

I appreciate the opportunity to be a part of the GMUG planning process, and also the huge amount of work that has been invested by the USFS in the draft plan. I have had numerous questions answered by the planning team and appreciate the helpful responses. I also listened to all of the webinars (not live, but later) and they were very helpful – please continue webinar recording/posting in the future.

I live in Ridgway, CO, in Ouray County; I live here by choice - I love to hike, ski, photograph and drive through the USFS areas all around here. SW Colorado is one of the most beautiful areas in the state. My comments in this letter focus on the plan land management components in or very close to Ouray County. The first issue that I am commenting on is a general issue that applies to all of Ouray County.

Timber Suitability: I understand that the great increase in timber suitability on the plan maps does not equate (necessarily) to actual future logging, but I also strongly believe that **timber harvest 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 inseparable from 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 drive/view/recreate in the surrounding terrain. The aspen and spruce/fir 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. Even patches of harvest would mar the beautiful views. In addition, the slopes above US550 south of Ironton (both east and west sides) drain into a biologically important fen area – any timber harvest production has the potential to damage this area. I also wonder about the potential for avalanche danger resulting from timber harvest in many of the areas of this County.

Following are specific regions in and near Ouray County that I have comments on:

- 1) **CORE Act additions to the Mt Sneffels Wilderness: I support the addition of the CORE Act Recommended Wilderness (and Roadless) 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 thankfully remote given their proximity to more heavily used areas (Blue Lakes for instance); the steepness of the trails and terrain protects them from over-use. 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 adjacent Wilderness

settings), not downgraded to semi-primitive/non-motorized as shown in Alternative B. If anything, the CORE Act additions are more remote and less traveled than many parts of the existing Wilderness. As stated above there should be no timber harvest allowed in this area on slopes >40%.

- 2) **Bear Creek parcel designated as Recommended Wilderness:** This 6,000 acre parcel includes the 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. **This parcel, from Bear Creek north past Bridge of Heaven, should be designated as Recommended Wilderness.** While the actual Bear Creek watershed is itself deserving of protection it is important to note that the parcel stretches quite a bit north from there, past Bridge of Heaven and Dexter Creek, still adjacent to the existing Wilderness and high to the east of Ouray - the name "Bear Creek Addition" is a bit misleading because there is so much more to the parcel than that. 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 S-21 Cow Creek bighorn herd; bighorn sheep frequent the high ridges above Bear Creek as well as the high meadows and ridges above Ouray towards Bridge of Heaven. I believe that the Hard Rock 100 race traditionally comes through this area and may need an exemption or permit to continue doing this if the area was designated as Recommended Wilderness. I also know that a local mining company (Ouray Silver Mines, Inc) has expressed some interest in doing fringe-lease mining somewhere on the parcel but my understanding is that their interest is at the far northern end of the parcel, beyond Dexter Creek; the small area they are interested in could be carved out of a Wilderness designation. The summer and winter ROS settings for this area should be semi-primitive non-motorized. Also, as stated above, there should be no timber harvest allowed in this area on slopes >40%.
- 3) **Baldy parcel designated as Recommended 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 especially an important part of their high-to-low elevation linkage of winter and summer habitats. This area was proposed as a Wildlife Management Area in Alternative B - I have concerns that the trail mileage cap for WMAs could create problems for the existing well-used and maintained trails in this area— these trails should not go away. **This area should be designated as Recommended Wilderness – we need to protect it while we can.** The winter and summer ROS settings should be set to semi-primitive non-motorized. As stated above there should be no timber harvest allowed in this area on slopes >40%.
- 4) **Hayden parcel designated as Special Management Area (SMA):** This parcel is approximately 10,000 acres, and on the west side of US550 (east of CR361 and north of Red

Mountain Pass) encompassing the long Mt Hayden Ridge. **I believe that this area should be designated as a Special Management Area.** An SMA designation would still allow existing helitrac and in-holding lodge uses but would also be protective of this unique area. Although there is a lot of mine scarring and some old roads, many parts of it are 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 very steeply below. Many times I have seen elk frequent the trees above Commodore Gulch and the benches north of Richmond Pass, and I know that elk and deer are common in the steep forested slopes on the west side of the ridge. As in Alternative B the Summer and Winter ROS settings should be semi-primitive non-motorized and the Scenic Integrity is High. This Hayden area, and the Bear Creek swath are some of the the largest and most remote (in their interior) areas left in Ouray County – we have to protect them while we still can. **While there is some pressure for more trails across the county, I believe that no additional trails should be built, and bike access should not be allowed in this SMA.** There are several historical and non-maintained (but lightly used) trails in this parcel - Senator Beck, Ptarmigan Lake, and Spirit Gulch. These trails appear on some non-USFS maps but I believe that they should **not** be officially maintained or added to official USFS trail maps or descriptions. At the same time I don't want the USFS to attempt to remove or “re-vegetate” these trails – they are lightly used and that use should be allowed to continue.

I know that the USFS has some pressures for increasing multi-user (hiker/biker/equestrian) recreation opportunities. **It may be appropriate for a 0.5 mile wide swath adjacent to US550 from approximately Ironton to Red Mountain Pass to be designated as General Forest or some other less-restrictive management option.** That would allow a multi-use trail to be built on the lower parts of this parcel, close to the existing US550 yet still out of the alpine and wildlife-rich areas. Such a swath might also be part of the solution for increased camping and bathroom resources along US550. As stated above there should be no timber harvest allowed in this area on slopes >40%.

- 5) **Abrams parcel designated as General Forest:** This is a 3000 acre parcel proposed as General Forest in Alternative B. It is east of US 550 and includes 4wd trails south of Engineer pass and west of Poughkeepsie Gulch. There is significant 4wd usage in this area and it needs to be better monitored and maintained (keep people and OHVs off the tundra). The winter ROS setting for this area in Alternative B is semi-primitive/motorized; winter snowmobile usage should be very strictly monitored and allowed only on designated roads (not cross-country). There is an existing Nordic area low down around the Ironton site and the snowmobile grooming there should be allowed to continue but no other off-road snowmobile access should be allowed. The moose population has increased in this area in the past few years and needs to be protected – I think that they are already bothered by the Nordic use. I support the summer ROS setting as semi-primitive/non-motorized as in Alternative B (that excludes the existing roads). There are current problems/issues with dispersed camping alongside US550 in the Ironton area and along the 4wd roads - better practices need to be regulated/managed (vehicles on tundra, etc.). 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, close to the existing US550. The Ironton fen area needs to be carefully protected though. As stated above there should be no timber harvest allowed in this area on slopes >40%.

- 6) **Turret Ridge, Little Cimarron, and Failes Creek/Soldier Creek additions to the Uncompahgre Wilderness:** These 3 areas (~15,000 acres total) are all in Gunnison County (not Ouray County) but most easily accessed from the Ouray County side. The Turret Ridge skyline is spectacular and part of the beautiful view from Ridgway – it does not have any trails and it should not in the future. **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; we need to preserve these areas while we can.** The summer and winter ROS settings for the Turret Ridge area should 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 is currently allowed on roads to the north of these areas but there should be specific designations (not just “No Restrictions” everywhere). I believe that the current Winter Management travel maps for these parcels is confusing – a large area shows winter snowmobile “No Restrictions” but I suspect that the actual area appropriate for cross-country snowmobile use is much smaller and likely north of these Recommended Wilderness parcels. As stated above there should be no timber harvest allowed in this area on slopes >40%.

Thank-you again for the opportunity to participate in this process.

Jennifer Cram