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Submitted via webpage: <https://cara.ecosystem-management.org/Public//CommentInput?Project=51806>
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Mr. Chad Stewart:

Thank you for the opportunity to comment on the draft GMUG Land Management Plan. I live in Ridgway CO, which is in Ouray County and part of the Uncompahgre National Forest Ouray Ranger District. I have been coming here for 30 years and moved here 3 years ago because of the natural beauty and recreational opportunities. Following are my comments on the Draft GMUG Land Management Plan:

- 1) Timber suitability maps in the plan: While the great increase in timber suitability on the maps does not necessarily mean actual logging I strongly believe that timber suitability areas should not be allowed in Ouray County on slopes >40%. The ‘steepness’ of the terrain in Ouray County is why people live and visit here - because of the views and opportunities to hike/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 for production. 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.
- 2) CORE Act additions to the Mt Sneffels Wilderness: I 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 of the plan. These areas are unexpectedly remote given their closeness to more heavily used areas; the steepness of the trails and terrain protects them. I 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 Alternative B.
- 3) Bear Creek Addition to the Uncompahgre 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, adjacent to 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. 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”. The Hard Rock 100 race traditionally comes through this area and should be given an exemption or permit to continue doing this. I 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 Alternative B but I think it would be more appropriate as Recommended Wilderness. I have concerns that the trail mileage cap for WMAs could create problems for the existing well-used and maintained trails; I do not want to see these trails go away. I believe that the winter and summer ROS settings should be set to semi-primitive/non-motorized.

- 5) Hayden parcel as SMA: This is an approx 10,000 acre area on the west side of US550 (east of CR361 and north of Red Mtn Pass) encompassing the Mt Hayden Ridge. This is a unique, beautiful area with lots of wildlife and amazing views. I believe that this area would be best protected by designating it as a Special Management Area. Although there is a lot of mine scarring and some old roads it is in general extremely hard for people to get to and few people are encountered up high— steep hikes as well as fewer maintained trails. Elk frequent the trees in Commodore Gulch and the benches north of Richmond Pass. I agree with the Alternative B Summer and Winter ROS settings as semi-primitive/non-motorized. There is some pressure for more trails across the county, but I believe the upper ~2/3 of this entire area should be protected – no new trails and no bike access. In the face of pressure for new multi-user trails it may make sense to put may be possible to allow a multi-use trail to be built on the lower parts of this parcel, close to the existing US550.
- 6) Abram parcel as General Forest: This is a 3000 acre parcel proposed as General Forest in Alternative B. 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). I think it makes sense to keep this area as General Forest. The winter ROS for this area in alt B is semi-primitive/motorized. The existing Nordic area around the Ironton site should be allowed to continue grooming but no other cross-country snowmobile access should be allowed. I support the summer ROS as semi-primitive/non-motorized in Alternative B (excludes existing roads). There are current issues with camping alongside US550 in the Ironton area and along the jeep roads and better management needs to happen.
- 7) Turret Ridge, Little Cimarron, and Failes Creek/Soldier Creek as 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. The Turret Ridge skyline is spectacular and part of the view from Ridgway. These 3 roadless areas are all adjacent to the existing Uncompahgre Wilderness and are habitat for elk, lynx, and moose. The summer and winter ROS settings for these areas should be no less than semi-primitive non-motorized.
- 8) Rocky Mountain Bighorn Sheep should be declared a Species of Conservation Concern (SCC): I have concerns about domestic sheep grazing and the disease risk to bighorn sheep in the Uncompahgre National Forest. Bighorn sheep should be declared a Species of Conservation Concern (SCC) in the GMUG – the current Draft Plan does not do that. The USFS is arguing that they don't need to list bighorns as SCC because they can provide for their persistence, but we don't want to just persist a few individuals or part of a herd – our local Tier 1 herds (S-21 and S-33) need to be monitored and maintained as viable and sustainable herds. The monitoring is necessary because of the high risk in this region that bighorns will contract respiratory disease from local domestic sheep on grazing allotments. Without the SCC designation the FS can just manage for persistence rather than monitor the herds and make sure the herds are viable and sustainable.

The process that the FS used to decide that the bighorns were not a SCC was incorrect – they did not follow their own rules in the Land Management Handbook FSH_1909.12_10, section 12.52d. In the GMUG Draft Plan there is an argument that bighorns cannot be declared SCC because they do not meet all 4 of the required items in the Land Management Planning Handbook. In Appendix 9 of the Draft Plan it says that a species needs to meet all 4 items, but in the actual FSH handbook it does not say that; it is clearly an 'or' choice from the way it is written. That statement in Appendix 9 is wrong, and the USFS needs to re-assess those 4 items correctly. These section 12.52 rules include:

Item 3d) adjacent forests declaring the species as SCC: The Rio Grande National Forest to our south has recognized bighorns as SCC.

Item 3c) Other agencies declaring the species in need of help: CPW has declared bighorns as a Species of Greatest Conservation Need (SGCN) in their latest State Wildlife Action Plan (SWAP).

Item 3f. Species for which the best available scientific information indicates there is local conservation concern about the species capability to persist over the long-term in the plan area due to:

(1) Significant threats, caused by stressors on and off the plan area, to populations or the ecological conditions they depend upon (habitat). These threats include climate change.

(2) Declining trends in populations or habitat in the plan area.

(3) Restricted ranges (with corresponding narrow endemics, disjunct populations, or species at the edge of their range).

(4) Low population numbers or restricted ecological conditions (habitat) within the plan area.

I believe that all 4 of these 3f conditions are met for bighorns:

1) threat from disease from domestic sheep grazing

2) Habitat is declining because of the increased human use (people hiking, jeep/ohv usage) all over the GMUG, even up high. Have you driven across Engineer Pass lately?

3) Range is restricted, again because of increased human use/pressure. On a map the range is there, but effectively there are increasing peopled/vehicled areas that bighorns will avoid.

4) Restricted habitat – again increased human use/pressure

If we wait until a big respiratory disease die-off is evident it is then too late – that is why the bighorns in the GMUG need to be declared a Species of Conservation Concern in this plan.

Thank-you for providing the opportunity for the public to comment on the GMUG Draft Management Plan.

Paul Pryse