



November 24, 2021

Chad Stewart
Forest Supervisor
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Dear Mr. Stewart and GMUG Planning Team,

The Town Council of the Town of Ridgway thanks you for this opportunity to submit comments on the Draft GMUG National Forest Revised Land Management Plan. We would like to start by stating that we fully endorse all of the joint comments you've already received from the Boards of County Commissioners of Gunnison, Hinsdale and Ouray counties. We share their preference for Alternative D, with the same concerns that the final preferred alternative, at a minimum, address our concerns regarding:

- Carbon Sequestration
- Socioeconomic Analysis and Management for Increasing Recreation Demands
- Suitable Timber
- The CORE Act and GPLI

In addition to the specific comments in the collaborative comments from the three regional counties, we'd like to make the following general comments:

- 1) Consideration of climate change impacts is obviously of utmost importance in the final Plan, so identifying a baseline for the current carbon sequestration capacity of the GMUG and including a determination of the carbon emissions of projects to monitor the balance of emissions vs. sequestration is essential.
- 2) The monumental growth in outdoor recreation in the GMUG in recent years has made it imperative that we have the tools to plan responsibly for continued growth in the future.
- 3) While the significant 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 of slopes greater than 40% removes most of production/harvest opportunities in the county. The steepness of the terrain in Ouray County is inherent 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 and spruce/fir forests along US550 and also along the north side of the Sneffels Range are a huge part of the draw of our region; allowing timber harvesting there would be terribly detrimental to that draw. In addition, the slopes above US550 south of Ironton drain into a biologically important fen area – any timber harvest in that area has serious potential to damage this area.



- 4) As you know, the CORE Act has passed the House, has had a hearing before the Senate Energy and Natural Resources Committee and awaits further action in the Senate. It is critical that all the Wilderness Areas and Special Management Areas in the bill are included in the preferred alternative. As stated in the regional county's collaborative comments, the GMUG-specific Wilderness, Special Management and Mineral Withdrawal designations included in the CORE Act are the result of more than 10 years of collaboration among local leaders, businesses, and ranchers in San Miguel, Gunnison and Ouray Counties. The Town of Ridgway has endorsed these efforts repeatedly and believes that the Preferred Alternative must include the Wilderness and the Special Management Area designations included in the Bill.

We will elaborate on those points, and others, below.

In addition to endorsing the collaborative comments mentioned above, we would also like to reiterate our support for the Ridgway-area *Community Conservation Proposal's (CCP)* polygons. The Town of Ridgway has endorsed the CCP in its entirety with a letter of support dated May 21, 2018 (note the proposal's name change since 2018 from "Citizen" to "Community" Conservation Proposal in order to be more inclusive of our aspiring citizens/immigrant community.) We support the entire proposal, including, specifically:

- Bear Creek as Recommended Wilderness – (addition to existing Uncompahgre Wilderness *consistent with Alt D settings*)
 - recommended wilderness
 - SROS Primitive
 - WROS Pristine (exception: adjacent to Engineer Road = semi-primitive, motorized) and Diamond Creek should be at least primitive (not semi-primitive, non-motorized as reflected in Alt D)
 - SIO very high
 - Timber – no (except for around Portland Mine) We oppose suitable timber along New Horsethief Trail in Alt D
 - Wildlife/botanical values per CCP narrative: connectivity, critical bighorn sheep production, bighorn summer and winter range; elk winter concentration; potential Canada lynx habitat; CNHP Dexter Creek Potential Conservation Area with Moderate Biodiversity Significance.
 - The Town feels these settings are critically important. Even if Bear Creek is not recommended for wilderness, we advocate for these settings. The semi-primitive non-motorized winter and summer ROS in Alt B are unacceptable and SIO rating in Alt B of "high" only along the gorge and "moderate" in the rest of the polygon region is also unacceptable. The scenic values along the Bear Creek National Recreation Trail and throughout the recommended wilderness polygon are exceptional.
- Baldy Mountain Roadless Area as Recommended Wilderness – (addition to existing Uncompahgre Wilderness; *consistent with Alt D settings*)



- recommended wilderness
- SROS Primitive
- WROS Pristine
- SIO very high
- Timber – no
- From GMUG Colorado Roadless Rule document (August 2011): *This area is critical bighorn sheep habitat and is actively managed for this species with extensive habitat improvements. The northern half includes potential lynx habitat. This area is a black bear summer and fall concentration area, elk winter range and winter concentration area, elk production area, and is mapped as mule deer winter and summer range, as well as Merriam’s turkey overall range.*
 - This polygon also adds acreage to potential wilderness at lower elevation with ecosystem types that are underrepresented in Colorado and the national Wilderness System.
- Hayden Mountain as Special Interest Area (SIA– All alternatives designate the 10,000+ acres of the Hayden polygon (from Black Bear Road to Camp Bird Road) as “general forest” providing little protection for the region’s wildlife, connectivity corridor, fen and scenic value. Alt B & D rate SROS & WROS as Semi-primitive non-motorized. We advocate for:
 - Special Interest Area
 - SROS & WROS – Primitive. Even though motorized routes exist within 3 miles of this polygon, we believe the current rating to be primitive and desire to see that setting maintained. At a minimum, a primitive setting should be identified for the northern portion of the polygon above 11,000 feet between Richmond and Neosha Trails with semi-primitive, non-motored in the remainder. (See plan components related to Recreation below.)
 - SIO - Very high in the northern portion cited above in ROS settings; high in the remainder (consistent with Alt D)
 - Timber - no timber harvesting anywhere in our proposed SMA, especially not on slopes greater than 40 degrees and absolutely no harvesting above the Ironton Fen. Even Alt D has a small area of suitable timber that we oppose. Alt B deems the areas E and N of Hayden Trail as well as along Hwy 550 suitable for timber. This is unacceptable.
 - Wildlife/botanical values per CCP narrative: wildlife connectivity, bighorn sheep production, bighorn summer and winter range, elk summer concentration, potential Canada lynx habitat, moose habitat, raptor nesting; CNHP 4 different Potential Conservation Areas all with Very High Biodiversity Significance; Hayden SIA adjacent to Ironton Fen. The fen should not be lumped into the “riparian” management category as it is a ground-water dependent peat-accumulating wetland and should be managed for these unique qualities.
- Mount Abram as Special Interest Area – Like Hayden, Mount Abram/Brown Mtn are designated “general forest” in the draft plan. We advocate for:



- Designation as Special Interest Area
- SROS - Semi-primitive, non-motorized, but like Hayden the upper elevations of Brown Mountain are really primitive (though Hwy 550 is visible) and should be managed to maintain this quality.
- WROS - Semi-primitive, motorized within half mile of snowmobile routes; *however*, the ridgeline of Brown and Abram and the area between FS Rd 884 and 878/876 should be semi-primitive NON-motorized.
- SIO - high (consistent with Alt D) San Juan Skyway Corridor
- Timber - no (see Hayden description above)
- Wildlife/botanical values per CCP: Canada lynx habitat, moose habitat, Mount Abram SIA is adjacent to Ironton Fen
- Turret Ridge, Little Cimarron, and Failes Creek/Soldier Creek Roadless Area as additions to the Uncompahgre Wilderness – as outlined in the Citizen Conservation Proposal and endorsed in a letter dated July 14, 2021 from the Town of Ridgway to Senator Bennet
 - These 3 areas (~15,000 acres total) are all in Gunnison County (not Ouray County) but most easily accessed from the Ouray County side.
 - Both residents and visitors 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, Canada lynx, and moose as well as an important part of the Tier 1 RBS-21 bighorn sheep winter range.
 - The summer and winter ROS settings for the Turret Ridge area should be primitive and absolutely no less than semi-primitive non-motorized. There are no existing trails in this area, and the Town of Ridgway opposes any trail development in this polygon.

If Little Cimarron and Failes Creek/Soldier Creek are identified for recommended wilderness, the appropriate summer and winter ROS would be primitive. Regardless of management type, the summer ROS should not be less than semi-primitive non-motorized. We prefer no motorized winter use due to wildlife values. Any winter motorized use contrary to our recommendation should be strictly limited to designated routes.

- We do have concerns about the trail/road mileage cap limit for WMAs. It is not clear in the Draft Plan what would happen in a WMA area to existing trails if the assessed trail-mile-per-square-mile number was greater than the cap of 1 - would trails be decommissioned or re-vegetated or would the FS keep the trails already there and just not add any more? We oppose decommissioning any existing trails in the County, whether they are official USFS trails or not.

Concerning Wild & Scenic River Eligibility, The Town notes that Appendix 11 of the revised draft plan identifies 14 segments and their tributaries, a total of 118.4 miles, across the entire GMUG National Forest as eligible for Wild & Scenic designation. We support the eligibility findings for all the stream segments included in the draft plan and specifically acknowledge these segments in the greater Ridgway area:

- Cow Creek



- We support the finding of Cow Creek and its tributaries – Wildhorse Creek, Wetterhorn Creek, and Difficulty Creek – eligible as “wild.”
- The Town of Ridgway advocates for identification of additional wildlife Outstanding Remarkable Values (ORV) given that these drainages include critical bighorn habitat and occurrences of black swift have been reported.
- Roubideau Creek
 - The Town is grateful to the USFS for finding Roubideau Creek and its tributaries eligible as “wild.”
 - We agree with the finding that Roubideau has Scenic and Geologic ORV’s and we request that its Botanical, Wildlife and Heritage ORV’s be recognized due to the occurrence of imperiled plants, the presence of desert bighorn and three species of warm water fishes, as well as indications of a historic rock panel.
 - We urge the USFS to assure that the GMUG Forest Plan be consistent with the BLM’s Resource Management Plan for Roubideau adopted in 2020.

In addition, the Town of Ridgway specifically requests that Bear Creek in Ouray County be found eligible as “wild”.

- Bear Creek is free-flowing along its entire length.
- The scenery is spectacular with deep gorges, thundering waterfalls, dramatic cliffs and golden aspen in autumn qualifying Bear Creek for a Scenic ORV.
- Geologic features including volcanic tuff pinnacles, iron-rich intrusions and fossilized tidal ripple marks qualify for a Geologic ORV. The ripple marks specifically should qualify Bear Creek for Wild and Scenic. This Precambrian fossilized rock dates between 1.8 – 2.1 billion years old and is the oldest evidence of the shallow sea that once occupied this region. The Bear Creek drainage is also the meeting place of the Rocky Mountain Province and the Colorado Plateau. Recent research has also revealed an Eocene paleocanyon carved into the San Juan Formation volcanoclastics.
- The Bear Creek National Recreation Trail that climbs and follows the creek is river-related; its popularity and notoriety stem from beauty of the cascading waters and waterfalls of Bear Creek. Bear Creek should be recognized as having a Recreation ORV.
- We are concerned that Bear Creek was found eligible in the GMUG’s 2005 Wild and Scenic Comprehensive Assessment (which was not adopted) but is not in the current draft forest plan. There is no evidence or explanation that conditions have changed diminishing Bear Creek’s ORVs.

As to the specific Plan Components, we would advocate for the following:



- Broad support for Wildlife Management Areas (WMAs):
 - The Town of Ridgway supports the concept of WMAs in the revised forest plan and ask that those be retained and strengthened with additional plan components. This important management area designation could help protect habitat for a variety of wildlife species. However, in places where Alternative D's wilderness and SMA/SIA recommendations overlap with the WMAs identified in Alternative B, we support the stronger management prescriptions that Alternative D's wilderness and SMA/SIA areas provide.
 - Areas assigned to this MA that are well below the one mile per square mile route density threshold should be kept that way; i.e., new routes should generally not be allowed in these areas for non-emergency uses, as the blocks with the lowest road densities likely provide the most secure wildlife habitat. A guideline should be added to retain the areas within this MA having lower route densities.
 - MA-STND-WLDF-02, limiting open motorized and non-motorized route density to one mile per square mile, is good, but as currently written, this standard only applies to non-administrative system routes. Even though "new permanent roads are not currently being created for timber management activities" (DEIS at 393), this standard would not protect wildlife from the temporary roads typically created during timber sales. Such roads, though officially not open to public use, can attract motorized users. These roads are often not posted as being closed and do not appear on motor vehicle use maps. Therefore, this MA needs direction, preferably a standard, to minimize creation of temporary roads and close and obliterate all temporary roads as soon as possible after completion of management activities, unless the environmental documentation for the project shows a need to add any of these roads to the system as roads or trails.
 - An additional component for WMAs is needed to ensure retention of security habitat for big game. We recommend a standard or guideline that requires or encourages maintenance of habitat blocks at least 500 acres in size having no roads or other human intrusions in big game habitat in all areas assigned to this management area. This standard or guideline is needed to allow achievement of MA-DC-WLDF-01: "*Large blocks of diverse habitat are relatively undisturbed by routes, providing security for the life history, distribution, and movement of many species, including big-game species...*"
 - An additional plan component should be added that requires any vegetation treatment project proposed must be solely for the desired objective of improved wildlife habitat. Commercial timber harvesting should be prohibited in WMAs.
 - An additional plan component should require only native seed or plants be used for revegetation.

- Native wildlife should be better protected:



- The plan has a good desired condition, FW-DC-SPEC-12 for wildlife security habitat, but a standard or guideline is needed to help ensure this desired condition is first attained, then maintained.
 - GDL-SPEC-15 and Table 4, establishing restrictions on activities that could disturb big game during their reproductive periods or while on winter range, should be a standard. Exceptions could be allowed for emergencies (e. g., removal of hazard trees along open roads) and where a biologist determines, based on local data, that the animals can be sufficiently protected with alternative restrictions.
 - GDL-SPEC-16, concerning travel route realignment to reduce habitat fragmentation and increase habitat security, should be a standard.
 - We are concerned that the Forest Service may have misinterpreted direction in the planning rule and planning directives in selecting species of conservation concern (SCC). As such, several imperiled species that likely meet the criteria for being identified as SCC were not designated SCC for planning purposes, such as the American marten, bighorn sheep, northern goshawk, boreal owl, Lewis's woodpecker, flammulated owl, several species of potentially imperiled bats, ptarmigan, western bumblebee, bighorn sheep, House's sandwort, reindeer lichen, Colorado Divide whitlow-grass, and Tundra buttercup. A set of species not included in the GMUG's SCC list are species Colorado Parks and Wildlife (CPW) has designated as Species of Greatest Conservation Need (SGCN) in the State Wildlife Action Plan (SWAP).
- Bighorn sheep must be protected:
 - We are particularly concerned that bighorn sheep have been left off the SCC list, given their vulnerability to disease passed from livestock as well as habitat fragmentation. The plan does not provide adequate justification for not designating this and other species as SCC. The Tier 1 (meaning little to no genetic introduction) bighorn herd in our region is RBS-21.
 - Forest Service Handbook FSH 1909.12 Land Management Planning Handbook Chapter 10 (page 38) under 12.52d – Species to Consider when Identifying Potential SCC states:

3. Species in the following categories should be considered:

- a) *Species with status ranks of G/T3 or S1 or S2 on the NatureServe ranking system. See exhibit 01 for description of NatureServe Conservation Status Ranks.*
- b) *Species listed as threatened or endangered by relevant States, federally recognized Tribes, or Alaska Native Corporations.*



- c) *Species identified by Federal, State, federally recognized Tribes, or Alaska Native Corporations as a high priority for conservation.*
- d) *Species identified as species of conservation concern in adjoining National Forest System plan areas (including plan areas across regional boundaries).*
- e) *Species that have been petitioned for Federal listing and for which a positive “90-day finding” has been made.*
- f) *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.*

Bighorn sheep qualify under b), c), and 3 of the 4 f) criteria above:

b): Colorado Parks and Wildlife (CPW) has designated bighorn sheep as Species of Greatest Conservation Need (SGCN) in the State Wildlife Action Plan (SWAP).

c): Rio Grande National Forest (RGNF) (which borders the GMUG) has designated bighorn as SCC in their forest plan and the habitat of RBS-21 includes both the RGNF and the GMUG.

The GMUG argues that bighorn do not qualify for SCC since they do not meet criteria f)(3) above, since bighorn in the GMUG are not at the edge of their range. We believe that bighorn need not meet all of the four criteria under f), and therefore that bighorn qualify for the SCC list by meeting criteria b), c), and 3 out of the 4 under f).



- STND-SPEC-13, requiring separation of bighorn sheep and domestic sheep must remain a standard. However, the draft plan components are not sufficient to ensure such separation. Disease transmission from domestic sheep to bighorns is considered one of the biggest, if not the biggest, threat to continued viability of Colorado's bighorn sheep herds.
- GDL-SPEC-14: change "should" to "must" (two places) and make this a standard. Disease transmission from goats is as big of a threat to bighorn sheep as it is from domestic sheep.
- As mentioned in our general comments on page one, *recreation must be sustainably managed*; specifically:
 - GDL-REC-12 makes the prohibition of motorized use off of designated routes a guideline. This is absolutely unacceptable. It must be a standard. It is required by the Travel Management Rule: "After these roads, trails, and areas are designated, motor vehicle use, including the class of vehicle and time of year, not in accordance with these designations is prohibited by 36 CFR 261.13." 36 CFR 212.50.
 - OBJ-REC-06 states: "Within 10 years of plan approval, to reinforce semi-primitive non-motorized settings, eliminate at least two unauthorized motorized travel routes." If the GMUG is serious about enforcing semi-primitive non-motorized settings, it should close many more than two unauthorized routes in 10 years.
 - In its explanation of ROS (DEIS p. 25), the GMUG states that primitive settings have to be at least three miles from the nearest motorized route. What is the basis for this? There are locations throughout the GMUG National Forest where – because of topography or other factors – a primitive setting should be assigned within three miles of a motorized route. The three mile standard seems unnecessarily arbitrary.
 - The draft plan has not mapped the "Pristine" category for summer ROS and for some Wilderness areas. There are no pristine settings for the summer ROS currently mapped, and nothing pristine is mapped for any alternative. Surely there are places on the forest that fit these criteria and must be mapped. This needs to be updated in the final plan.
- Again, as we touched on in our brief page one comments, the Draft Plan's analysis of timber suitability is ill-advised. Specifically:
 - As per the collaborative comments from the three regional BOCC's: "*We strongly oppose the substantial increase of suitable timber proposed in this pre-Draft Plan.*"
 - Every alternative in the draft plan posits a significant increase in suitable timber, which is a designation that interferes with consideration of responsible management of the forests for uses other than timber production. *The draft plan seems designed to maximize the possibility of future timber harvest, even though the GMUG National Forest is much*



more valuable for conserving biological diversity and recreation than it ever could be for timber production.

- Far too much land is found suitable for timber production in all action alternatives.
 - Numerous acres that should be unsuitable for timber production are instead found suitable. *Specific to Ouray County – see section above regarding designations of specific landscapes Baldy, Bear Creek, Hayden and Abram, **Note:** there should be no lands deemed suitable for timber along Nate Creek Trail (western edge of Cimarron Ridge Roadless Area) nor along the Dallas Trail (north of Sneffels Range and adjacent to Mount Sneffels Wilderness and Whitehouse Roadless Area (a majority of the Whitehouse RA is included in the CORE Act's Whitehouse Addition to the Mount Sneffels Wilderness.)*
 - Steep slopes (greater than 40%) should not be found suitable, which, as stated above, would remove the vast majority of acreage deemed suitable in Ouray County.
 - Lands uneconomical to harvest should not be found suitable.
 - Finding lands suitable that cannot be harvested economically, or in some cases, that cannot be harvested at all during the life of the revised plan, leads to artificially inflated calculations for sustained yield limit, projected timber sale quantity (PTSQ), and projected wood sale quality (PWSQ). It misleads the timber industry and the public, as well as present and future agency staff, about how much timber can or should be cut on the GMUG. It could lead to lands with trees actually suitable for timber production being overcut to meet an inflated PTSQ or PWSQ that was based in large part on thousands of acres of lands that cannot be harvested during the life of the plan and likely long afterward.
 - Based on all the points above, please reevaluate all acreage deemed suitable for timber harvesting.
- In this time of extended extreme drought, watershed protection must be prioritized:
 - It is vitally important for the plan to recognize that the Town of Ridgway has a watershed protection plan in place. and we want to ensure that it is considered. We strive to protect our water, soil quality and the overall health of the watershed to ensure that our water supply is protected in terms of quality and quantity.
 - FW-OBJ-INFR-03 needs to be more robust. With watershed restoration being at the forefront of the plan revision, at least one action per year should be completed, rather than only five actions in a decade.
 - Per objective FW-OBJ-WTR-04, an increase in the percentage of trending watersheds toward improved watershed conditions should be implemented. Over the life of the plan, the majority of sub-watersheds should be driven towards better conditions. In addition, improvements in FW-OBJ-RMGD-06 are needed to move towards more than 2500 acres or 15 miles of streambank improvements in each 10-year period after



- plan approval. These objectives can greatly contribute to the overall watershed and wetland health of areas and communities, both human and ecological, that rely on water and its associated habitat contained within the GMUG.
- The DEIS incorrectly reports that “21 streams totaling approximately 141 miles [...] do not meet water quality standards (table 133)”. This statistic is incorrect because it was developed using an outdated version of the List of Impaired Waters and likely included GIS errors. It also omits lakes and reservoirs on the GMUG that do not meet water quality standards. The following provides a current and accurate summary of the impaired waters in the GMUG:
 - Approximately 1,230 miles of streams on the GMUG do not meet one or more water quality standards.
 - Table 133 should be updated to reference the current version of the Section 303(d) List of Impaired Watershed and Monitoring and Evaluation List.
- Once again, building on our brief comments on page one, climate change impacts need to be considered much more comprehensively throughout the plan:
 - The final Desired Conditions & Objectives, Standards, Guidelines and Suitability sections of the Plan must all include consideration for how projects and activities will either improve or degrade the resiliency of landscapes and ecosystems to adapt to the changing climate and only support the approval of projects or activities that will improve or not lessen the potential impacts of climate change by promoting native and resilient ecosystems, providing more carbon sinks, reducing existing forest stressors and collaborating with partners to monitor and respond to climate related changes in forest and landscape health.
 - The rapid increase of climate change connected impacts, requires all of us to more proactively determine the most effective actions that can be implemented in order to adapt and support the resiliency of our natural resources. The GMUG Plan update should certainly include a serious level of recognition on that point.
 - Lastly, on the topic of Tribal Consultation and Cultural Resources:
 - By law the USFS is required to make a “reasonable and good faith” effort to hold regular Tribal Consultations. We have confirmation that one such meeting took place on September 30, 2021 between Ute Mountain Ute Tribal Preservation Officer and the GMUG team. We encourage the GMUG to continue this dialogue with Tribal leaders and staff from all three Ute Tribes and plan for regular, consistent communication throughout the planning process and into the future when analyzing future projects.
 - The plan components related to Cultural and Historic Resources (pages 42 & 43 of the draft plan under Part 3; Ecosystem Services and Multiple Uses) are weak and inadequate. The 5 year window to meet two



proposed objectives (mapping culturally significant locations and the plant osha) seem longer than needed given the availability of data on these topics. Indigenous communities have many uses for additional forest resources that are not addressed within the plan. Please consider ways to more adequately address these issues.

Thank you for your time and consideration. We appreciate the opportunity to provide comments on the Forest Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "John Clark". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

John Clark
Mayor
Town of Ridgway
On behalf of the Town Council of the Town of Ridgway