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LYNN M. PADGETT

JAKE NIECE

BOARD OF COUNTY COMMISSIONERS

P.O. Box C • Ouray, Colorado 81427 • 970-325-7320 • FAX: 970-325-0452

November 26, 2021

Attn: Chad Stewart, GMUG Forest Supervisor; Tammy Randall Parker, Public Services Staff Officer; Samantha Staley, Forest Planner; Jonathan Tucker, Asst. Forest Planner; GMUG Forest Plan Revision Team
2250 South Main St
Delta, CO 81416

Via email to: chad.stewart@usda.gov; tamera.randall-parker@usda.gov; samantha.j.staley@usda.gov; jonathan.tucker@usda.gov & Via electronic submission to GMUG Online Feedback Tool: [US Forest Service NEPA Projects Home \(ecosystem-management.org\)](https://www.usfs.gov/eng/forests/management/NEPAProjectsHome.aspx)

RE: Ouray County Cooperating Agency Comments on the August 2021 DRLMP and DEIS Public Documents – Grand Mesa, Uncompahgre, and Gunnison Forest Plan Revision #51806

Dear Responsible Official(s) and Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests Planning Team,

Ouray County, through the Board of County Commissioners, is providing comments on the proposed Draft Revised Land Management Plan (DRLMP) provided to the public in mid-August, with Volumes I and II of the Draft Environmental Impact Statement (DEIS).

Ouray County comprises 542 square miles; 54 percent is private land, 36 percent is U.S. Forest Service (USFS) administered by the GMUG Ouray Ranger District, and 7 percent is Bureau of Land Management (BLM) administered by the Uncompahgre Field Office. Our two municipalities Ouray and Ridgway, and 4,900 residents, provide gateway services to public lands users. Our Master Plan, adopted in 1999, provides: "The overall goal of the Ouray County Master Plan is to allow gradual, long-term population and economic growth in Ouray County in a manner that does not harm the County's irreplaceable scenic beauty, wildlife, air, and water resources, and other environmental qualities and that does not unduly burden the County's residents or its governments." Our Master Plan emphasizes the importance of agriculture, local government relationships, economic development, housing, natural resources, rural character, tourism, transportation and infrastructure, visual resources, and wildlife and plant habitats.

Federal public lands are important to our local economy and cultural values. The ecological integrity and sustainability of the Forest, which provides our source waters and headwaters, and opportunities for agriculture, pristine habitats, recreation, responsible mining, and ecosystem services, is vital to our local economy and well-being.

Our Master Plan recognizes the importance of the dramatic topography found here. "Ouray County contains some of the most unique and beautiful scenery in Colorado. The diversity of the landscape ranges from jagged mountain peaks and mesas to river valleys and irrigated fields. Preservation of this visual beauty is of utmost importance to the citizens of the County. The citizens want to be assured that future development will not hinder, impair or destroy Ouray County scenic beauty."

Ouray County has been actively involved in the GMUG forest plan revision process. We have participated in cooperating agency meetings and have provided written comments for cooperating agency and public feedback periods numerous times. Our comments dated 5/30/2019 and 7/23/2019 appear in the GMUG public reading room, but we have submitted many more comments since the beginning of the scoping and assessment phases. All of our previous comments are incorporated by reference into this comment letter. Because the August 2021 Draft Revised Land Management Plan (DRLMP) is very similar to the May 2021 cooperating agency draft DRLMP, all of our comments dated July 16, 2021, and related follow-up emails to the GMUG planning team are incorporated by reference here. The collaborative joint comment letter dated July 16, 2021, and signed by the entire Boards of County Commissioners for Ouray, Gunnison, San Miguel, and Hinsdale Counties is also incorporated by reference here.

I. General Comments

We appreciate the incredibly hard work the planning team has put into the DRLMP/DEIS. As a cooperating agency and small county with limited staff and resources, we have put in a lot of effort to participating and trying to offer constructive comments respectful of the diversity of gateway communities and conditions across the 3 million acres of the GMUG. We are most concerned and knowledgeable about the portion of the Ouray Ranger District that intersects Ouray County. However, our citizens and visitors frequent adjacent Ranger Districts, which connect us hydrologically, and via trails, routes, or alpine 4WD roads. These adjacent areas are the high alpine basins in San Miguel County and the forks of the Cimarron and Uncompahgre Wilderness in Gunnison County.

In general, we support more of Alternative D than the agency preferred Alternative B, and we do not support Alternative C at all. However, Alternative D needs to be significantly modified to improve resiliency, conservation, recreation, water resource protection, Species of Conservation Concern, timber suitability, ecosystem services, and ecological sustainability. Ouray County urges USFS to select Alternative D with modifications as the preferred alternative.

Modifications needed to improve Alternative D include:

- Wildlife habitat enhancements should be the primary design purpose for vegetation management and timber harvesting within Wildlife Management Areas.
- Vegetation management and timber harvesting should prioritize the resiliency of our Wildland Urban Interface, and overall forest health objectives.
- The full acreage of lands identified by Colorado Parks and Wildlife (CPW) as High Priority Habitat (HPH) should be shared publicly in the supporting information of the Revised Forest Land Management Plan and EIS. The GMUG's rationale for which HPH lands were incorporated into a

potential Wildlife Management Area (WMA) in one or more alternatives and why the remainder of HPH lands were excluded from being considered in any alternative as a WMA should be provided. The rationale for including HPH as "General Forest" should be explained. GMUG should be transparent about why certain HPH was included within a proposed Wildlife Management Area in Alternative D or B, while other HPH is not.

- Similarly, the GMUG should share the forest-wide and WMA-specific trail density modeling used in the DRLMP and DEIS publicly. It is important to understand where there is HPH outside of WMAs and what the trail density is, as there will be pressure for new trails during the life of the plan. CPW has provided an amended trail density calculation methodology¹ that seems to provide more resolution and meaning for measuring trail and route density for WMAs in their November 24, 2021 comments. This recommendation should be modeled forest-wide and made publicly available for comparison. While revised CPW methodology appears to be improved, we and the public should be provided the actual trail density modeling. It appears that the revised methodology will treat motorized, mechanized, and primitive trails as creating the same density, regardless of the trail's or route's zone of influence. We believe the zone of influence can be different depending on noise, traffic type, traffic volume, the season of use, etc. It is unclear to us what the phrase "system routes" refers to. Are administrative use only trails and routes still calculated as "system routes?" We appreciate that the revised CPW model clarifies via a recommendation to the GMUG, "there shall be no net gain in system routes, both motorized and non-motorized, where the system route density already exceeds one linear mile per square mile, within the Wildlife Management Area (WMA) boundary.

Additions of new system routes within or adjacent to WMAs shall not cause the route density in a proposed project's zone of influence to exceed one linear mile per square mile within the WMA." However, there still doesn't seem to be an allowance for trails that switch back on steep slopes. Depending on the switchback tightness, it is possible that the zone of influence to wildlife is exactly the same as a straight trail, but the trail length could be doubled just from the switchbacks. We are interested in supporting WMAs in Ouray County, but we need to obtain and understand the HPH and route density models first. Understanding if WMAs could impact trails that Ouray County considers "public access routes"^{2,3} on our official County Road and Bridge map is very important to us. These public access routes were identified through a multi-year collaborative process which

¹ Colorado Department of Natural Resources: Colorado Parks and Wildlife. (November 24, 2021). *CPW Comments Draft Forest Plan for the Grand Mesa, Uncompahgre, and Gunnison National Forests [letter]*. https://cara.ecosystem-management.org/Public/DownloadCommentFile?dmdId=FSPLT3_5697441 (links to GMUG Public Comment Reading Room document); accessed 11/25/2021. Pages 34 and 41-42.

² Ouray County. (2014). *Official Ouray County Road Map, July, 2014 - showing Public Routes ONLY, not a complete transportation map*. [Map]. Ouray County Board of County Commissioners and Bockes, Jeff. Retrieved July 12, 2021, from <https://ouraycountyco.gov/DocumentCenter/View/2476/2014-014-Exhibit-A---Ouray-County-Road-Map?bidId=> ; PDF. (Note: Official County Road Map, showing County maintained routes and other Public Routes in the county. NOT a complete transportation map, - private routes, etc. not shown. (Resolution 2014-014, Exhibit A).

³ Ouray County. (2014). *Ouray County Historic Route Index*. [Index]. Ouray County Board of County Commissioners and Bockes, Jeff. Retrieved July 12, 2021, from <https://ouraycountyco.gov/DocumentCenter/View/2477/2014-014-Exhibit-B---Ouray-County-Historic-Route-Index?bidId=> ; PDF. (Note: Chart showing historic and current mapping and other documents which support Public Routes shown on the Official Ouray County Road Map (Resolution 2014-014, Exhibit B).)

included representatives of the USFS GMUG and BLM Uncompahgre Field Office (UFO) as well as the Ouray Trail Group and Ouray County Historical Society. Some of these routes are primitive trails dating back to the late 1800s or early 1900s and are not USFS "system routes." Part of Ouray County's due diligence needs to include understanding if there will be pressure to close or reroute historic public access routes, which would be in conflict with existing county policies and regulations.

- Alternative D includes Recommended Wilderness or Special Management Areas that were either part of the CORE Act or the Community Proposal, where GMUG believes there has been support officially indicated to GMUG by the county it is located in. However, there are other parcels that were identified by GMUG in the wilderness inventory and/or evaluated in the wilderness evaluation – processes that pre-dated the Community Proposal – which were supported by the county they are located in, during the wilderness inventory and evaluation process. Where a county supported a recommendation of wilderness or special management/special interest for certain parcels within at least one alternative, these were not considered. An example is Lone Cone.
- Federally listed critical habitat of the Gunnison Sage-Grouse (GuSG) is primarily within General Forest MA in Alternatives C, B, and D. In Alternatives B and D, Lands Suitable for Timber and High Use Recreation Areas intersect GuSG critical habitat. GuSG critical habitat should be located within Wildlife Management Areas or equally protective MAs such as Designated Wilderness, Recommended Wilderness, Special Interest, or Special Management Areas where lands are actively managed to conserve or enhance GuSG habitat.
- Carbon sequestration and climate change adaptation should be addressed, so the effects of different alternatives are analyzed.
- Roadless areas should not allow motorized uses and should be excluded from Lands Suitable for Timber.
- Fens need to be treated with care for their unique and fragile groundwater-dependent hydrology and susceptibility to alterations of each fen's distinct chemistry from surficial disturbance. GMUG should incorporate fen inventory updates, monitoring, assessment into the Revised Forest Land Management Plan. GMUG should not allow any activity or project to alter a fen's hydrology, geochemistry, or peat accumulation.
- Apparent mismatches or GIS errors in calculations for the steepness of slopes, ROS, and Scenic Integrity with respect to existing wilderness and existing travel management should be reviewed and fixed.
- GMUG should retain, not degrade, pristine, primitive, and semi-primitive conditions. There appears to be a trend to degrade desired conditions between Alternative A (no action) across Alternatives B-D, including in Designated Wilderness.

- The Species of Conservation Concern list should leverage state natural resource agencies' expertise and take a less narrow approach to qualify rare, sensitive, and globally or state imperiled species as Species of Concern. GMUG's approach should not rely on how a species' range intersects the orientation of political boundaries, especially if three SCC indicators listed in FSH Chapter 10 12.52d.3.f.(1-4) are present. Native plants with documented occurrences should be considered to be present unless there have been significant alterations to habitat.
- Wild and Scenic River eligibility considerations ignore important existing Outstandingly Remarkable Values (ORVs) and only choose a subset of ORVs to manage for. Eligible segments should be managed to retain all existing ORVs.
- The cooperating agency and public comment process for the DRLMP/DEIS did not make all of the documents and supporting files available for the entire review and comment period, having a chilling effect on gathering well-informed and thoughtful input. Supporting data should be provided for increased transparency and understanding during the next iteration of presenting an agency preferred alternative (which should reflect a modified Alternative D).
- A new forestwide Standard that requires electric-assist bicycles (e-bikes) to stay on motorized routes is needed. Mechanized trails that currently allow bikes have not been built or analyzed for e-bikes. E-bikes will greatly increase trail use, with much heavier vehicle weights, faster speeds, and wider turning radii. Wildlife and user conflicts and erosion or trail sustainability issues will be exacerbated without such a standard in place. E-bikes, motor-assisted pedal bikes, and human-only powered mechanized travel need to be differentiated and defined in the plan, so that we have the correct analysis of affected environments and ecosystems in the final alternative and EIS.
- Potential impacts of unmanned aircraft systems (also known as "drones") on wildlife needs to be addressed and mitigated in the Revised Forest Land Management Plan. Forestwide direction and standards should be provided in order to prevent resource damage, unauthorized commercial uses of the forest, and harassment of wildlife and forest users. While FW-STND-REC-09 says that "consistent with Federal Law, drones shall be prohibited to be flown overhead *any visitor* to National Forest System Lands," drones can still harmfully harass wildlife such as ptarmigan, Gunnison Sage-Grouse, and big game, even when people are not present. CPW published a press release in August 2021 urging the public to stop harassing wildlife.⁴ Colorado Parks and Wildlife Field Services Assistant Director Heather Dugan explained in the press release, "The definition of harassment is causing any change in the behavior of the wildlife. So, if the animal runs, if it changes direction, if it stops eating, that's harassment. Any change in the animal is considered harassment and it's illegal." CPW is seeing more cases of people harassing wildlife with drones. Dugan stressed that the use of a drone for hunting is not only a violation of CPW Commission Regulations (see below), but also a violation of the Federal Airborne Hunting Act.

⁴ Colorado Parks and Wildlife urges public to avoid harassing wildlife when using drones [press release] (August 2021). <https://cpw.state.co.us/aboutus/Pages/News-Release-Details.aspx?NewsID=7911> ; accessed 11/26/2021.

FW-STND-REC-09 also says, "Public recreational use, including launching, landing, and operating of unmanned aircraft systems shall be prohibited within MA 1.1 (Wilderness), 1.2 (Wilderness to be Analyzed), 2.1 (Special Interest Areas), 2.2 (Research Natural Areas), 4.1 (Mountain Resorts), 4.2 (Recreation Emphasis Corridors), at developed recreation sites (campgrounds, designated campsites, trailheads, visitor centers, parking lots, overlooks, day-use areas, boat launches), on Forestwide roads and trails, and at trail summits." This language is improved over the previous plan revision draft previewed in May 2021 but needs to add language to protect wildlife species, consider timing limitations during especially sensitive periods for wildlife, and avoid disturbing hunters and anglers.

- Evidence of meaningful coordination and consultation with federally recognized Indian Tribes, especially the three Ute tribes, needs to be included in the Revised Forest Land Management Plan. The 2012 Planning Rule (36 CFR 219.4(b)(1-2)) requires the responsible official to coordinate land management planning with and review the planning and land use policies of federally recognized Indian Tribes, other Federal agencies, and State and local governments, where relevant to the plan area.
- Adaptive management monitoring, assessment, and evaluation to identify proactively when user thresholds are beyond desired conditions and/or causing resource damage are needed. Collaborative planning for future designated dispersed campgrounds and trails is needed.
- Please see our recent comment letter on scoping issues for the Blue Lakes Trail and affected portion of Sneffels Wilderness (attached as Appendix A). We are also attaching (Appendix B) our recent traffic counts on county roads which might be useful to GMUG for understanding use volumes on Ouray County Roads used to access the GMUG.

This topic is relevant for ROS and Scenic Integrity. The BOCC supports collaborative scoping and planning processes to identify sustainable trail opportunities that mitigate and minimize conflicts. We desire designated dispersed camping opportunities that will provide adequate sanitation and parking while avoiding recreational resource damage. We are excited about the award of a Regional Outdoor Partnership grant to work collaboratively with stakeholders and the Ouray Ranger District.

Specific to the recent RAT-COPMOBA proposal to scope new multi-modal trails in the Ouray Ranger District, we support concepts examined where proposed new trails do not cross private property without permission, avoid existing Wilderness or the proposed Whitehouse East, Whitehouse West, Baldy, and Bear Creek Addition parcels. We could support trails in the Iron-ton area if they exclude e-bikes. Our concern is that multi-modal trails must be sustainable for the speeds, payloads, and turning radii of mechanized bikes if allowed, and trails may not be possible if they must meet those standards. E-bikes can degrade our existing trails and create resource damage. We can support trails in the Cimarron area. If they are located in Gunnison County, like the conceptual Silver Jack Climb and Traverse routes, there should be a collaboration with Gunnison County stakeholders. The proposed summer ROS in the GMUG DRLMP Alternative D is semi-primitive non-motorized (SPNM) in these areas.

- Additional Conservation Watershed Networks and Priority Watersheds should be identified. Governor Creek in Governor Basin, which is a tributary to the Uncompahgre River is an excellent example of leveraging interagency and public-private partnerships working together to mitigate legacy mine-related pollution that is causing impairment. Imogene Creek and Red Mountain Creek should also be examined for inclusion as Priority Watersheds. We are attaching our recent letter to GMUG Ouray Ranger District regarding allowing USFS lands to participate in a Time Critical Removal Action in Governor Basin (attached as Appendix C). High alpine lakes and streams with native fish populations should be considered for Conservation Watershed Networks. Trout Unlimited and American Whitewater have data on Colorado River Cutthroat Trout (CRCT) populations in Ouray County, which includes alpine lakes and streams in Ouray County. We are unsure if this data is public, so please follow up with the expert agencies and organizations.
- Winter and Summer ROS and Scenic Integrity need to be examined for mistakes or inconsistencies. For example, in Ironton, the winter ROS should reflect that there is no motorized/mechanized winter recreation on the Ironton Nordic trails system, except for administrative use of one snowmobile for grooming. It appears this area is "Roaded Natural" for Alternatives B-D.

II. Timber Suitability

We understand that the 2012 Planning Rule has changed from the 1982 Planning Rule, which excluded areas from timber suitability if there they had questionable economic feasibility for timber production during the planning period (such as due to market and/or operational limitations). The suitability analysis for the 2012 Planning Rule retains timber stands that may not be economically feasible by including all areas deemed "capable" of producing timber. We understand that the change in process between these Planning Rules inherently leads to having an increased acreage of suitable timber across the forest under the 2012 Planning Rule requirements. However, the responsible officials of the GMUG DRLMP have the latitude under the 2012 Planning Rule to omit areas with steep slopes, which they define as greater than 40% slopes, as demonstrated in Alternative D. Alternative D also demonstrates that the GMUG can exclude lands where timber production is not compatible with desired conditions and objectives. Alternative B makes the assumption that new technology (e.g. highline logging, cable yarding, and tethered logging) will be likely to make timber sales economically feasible slopes greater than 40% in the future.

In Alternative B, six types of management areas were deemed to have incompatibilities with timber production and thus excluded suitable timber from these management areas. Alternative D demonstrates that there is discretion for the GMUG in these assumptions and decisions. In Alternative D, one additional management area and the areas within the Designated Trails overlay, Wild and Scenic Rivers overlay, and the Scenic Byways overlay were also omitted from Lands Suited for Timber Production along with slopes greater than 40% compared to Alternative B. Economic viability of timber production will vary with the travel distance and level of effort to get to a mill, and the wood type. There is no reason to assume new mills are likely to come online in the planning period. It is questionable to assume all of the forest types identified as Lands Suitable for Timber Production can be restocked within 5 years. There should be a cap on steep slopes (40%, although some science suggests 30%).

The GMUG maintains that the suitable timber identified in Alternatives B and C only have only 7 percent of the suitable timber occurring on slopes greater than 40% (DRLMP page 32). If this is true, it is misleading. Using GIS to compare the GMUG lands within Ouray County, where the lowest elevation GMUG forest land is at approximately 7,000 feet elevation, and most is above 9,000 feet elevation. For Alternative B within Ouray County, 26 percent of the lands identified as Suitable Timber is on slopes greater than 40%. For Alternative B within the entire Ouray Ranger District, which also contains lands on the gently sloping Uncompahgre Plateau in Montrose and Mesa Counties, 11.7 percent of the lands identified as Suitable Timber are on slopes greater than 40%. Almost all of the steep slopes are in the portion of the Ouray Ranger District intersecting the San Juan Mountains and Cimarron Range, while almost none of the steep slopes occur on the Uncompahgre Plateau.

In the Ouray County portion of the Ouray Ranger District, the mean slope percent of Alternative B Suitable Timber lands is 29.5% compared to 17% in Alternative D, where the slopes greater than 40% are omitted. The steep slopes with Alternative B Suitable Timber in Ouray County are concentrated above Hwy 550, above and visible from the San Juan Skyway Scenic Byway, on the west-facing slopes of Mount Abram, and east-facing slopes of Hayden Mountain. **Ouray County asserts that the methods used to identify Lands with Suitable Timber must omit the slopes greater than 40% and exclude the areas listed as excluded in Alternative D (page 230): Management Areas 1.2, 2.1, 2.2, 4.1, 4.2, 3.3; Wild and Scenic River overlay, Designated Trails overlay, and Scenic Byway overlay; and slopes greater than 40%. Lands prominent in the viewshed of a Scenic Byway should be excluded. Lands within Wildlife Management Areas (4B/4Bx and 3.2) and Colorado Roadless Areas should also be excluded from Lands with Suitable Timber.**

Forest Service Handbook FSH 1909.12, Chapter 10 – The Assessment, Section 13.33 refers to sources of information that should be used for assessing timber.⁵ This information, including GIS files, should be made available to cooperating agencies and the public during the planning process for review. This has not been done.

It is important to distinguish between Timber Production and Timber harvest. **Timber production** - The purposeful growing, tending, harvesting, and regeneration of regulated crops of trees to be cut into logs, bolts, or other round sections for industrial or consumer use. **Timber harvest** -The removal of trees for wood fiber use and other multiple-use purposes.⁶ GMUG DRFLMP adds an additional line to the definition of Timber production, "Managing land to provide commercial timber products on a regulated basis with planned, scheduled entries." (DLRMP page 164).

Congress has directed the Forest Service to conduct long-term planning and management through the passage of the National Forest Management Act of 1976 (NFMA).⁷ **No timber harvest for the**

⁵ <https://www.fs.fed.us/emc/nfma/TIPS/directives/ch10timber.shtml> ; accessed 11/24/2021.

⁶ <https://www.ecfr.gov/current/title-36/chapter-II/part-219#219.19> ; accessed 11/24/2021.

⁷ P.L. 93-378 P.L. 94-588, 16 U.S.C. §1601 et al. (NFMA). NFMA amended the Forests and Rangelands Renewable Resources Planning Act (RPA), P.L. 93-378, 16 U.S.C. §§1600 et seq.

purposes of timber production may occur on lands not suited for timber production.⁸ Timber harvest for purposes other than timber production is allowed, even on those lands not identified as Suitable for Timber Production in the forest plan. The plan "...may allow for timber harvest for purposes other than timber production... as a tool to assist in achieving or maintaining one or more applicable desired conditions or objectives of the plan in order to protect other multiple-use values, and for salvage, sanitation, or public health or safety. Examples of using timber harvest to protect other multiple-use values may include improving wildlife or fish habitat, thinning to reduce fire risk, or restoring meadow or savanna ecosystems where trees have invaded."⁹

Ouray County has reviewed the differences between alternatives B, C, and D for Lands Suitable for Timber Production. As mentioned above, it is imperative that the Alternative D methodology excluding slopes greater than 40% be utilized. NFMA states, "The responsible official shall identify lands within the plan area as not suited for timber production if any one of the following factors applies... The technology is not currently available for conducting timber harvest without causing irreversible damage to soil, slope, or other watershed conditions..."¹⁰ GMUG (page 231) says it is including slopes greater than 40 percent "under the assumption that new technology and approaches would likely make timber sales economically feasible in these areas." This is not the same thing as showing that the technology is currently available without causing irreversible damage to soil, slope, or other watershed conditions. The steep slopes identified in alternative B as Lands Suitable for Timber Production are directly upslope of fen complexes. NFMA directs the USFS to identify these lands as NOT suited for timber production at the planning stage. **Ouray County asserts that the methods used to identify Lands with Suitable Timber must omit the slopes greater than 40% and exclude the areas listed as excluded in Alternative D (page 230): Management Areas 1.2, 2.1, 2.2, 4.1, 4.2, 3.3; Wild and Scenic River overlay, Designated Trails overlay, and Scenic Byway overlay; and slopes greater than 40%. Lands prominent in the viewshed of a Scenic Byway should be excluded. Lands within Wildlife Management Areas (4B/4Bx and 3.2) and Colorado Roadless Areas should also be excluded from Lands with Suitable Timber.**

The steep slopes and forested land that is identified as lands NOT suited for timber production are still eligible for vegetation management and timber harvests where the primary purpose and design is to reduce wildfire risk, improve wildlife habitat, and improve safety. Should there be evidence that technology exists at some point in the future to conduct timber production activities, the plan can be amended. We noted that the plan does not require restocking or reseedling for timber harvests vs. timber production. The plan should address site-specific conditions that will trigger replanting requirements for timber harvests.

Ouray County supports the annual CCF production of 55,000 CCF found in Alternatives B and C and allows for a salvage proportion greater than zero. Alternative D does not allow for salvage, and

⁸ 36 C.F.R. §219.11. <https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol2/pdf/CFR-2012-title36-vol2-sec219-11.pdf> ; accessed 11/24/2021.

⁹ 36 C.F.R. §219.11. <https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol2/pdf/CFR-2012-title36-vol2-sec219-11.pdf> ; accessed 11/24/2021.

¹⁰ 36 C.F.R. §219.11. <https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol2/pdf/CFR-2012-title36-vol2-sec219-11.pdf> ; accessed 11/24/2021.

Alternatives B and C allow for 22% in the first 10 years and 9% in years 11-20. Ouray County supports a hybrid approach of modifying Alternative D to include identifying the Lands Suitable for Timber as discussed above but incorporating allowances for producing up to 55,000 CCF annually, and allowing for a small proportion of judicious salvage that does not harm key habitat components, such as for lynx.

III. DRLMP and DEIS Cooperating Agency and Public Comment Process Concerns: Lack of complete documents and supporting files available to review during the full extent of Cooperating Agency and Public comment periods.

While the U.S. Forest Service (USFS) and GMUG Planning Team solicited input from state agencies, forest users, local governments, and communities during the various scoping, assessment, and other phases of the plan development, we remain concerned that neither cooperating agencies nor the public have been given a bona fide full 90-day comment period with the DLRMP, DEIS, and a full suite of supporting GIS files. The U.S. Forest Service did not release the DEIS to cooperating agencies for "preview" during the cooperating agency comment opportunity between mid-May and mid-July. Other than portions of Chapters 1 and 2, we were not given the opportunity for a 60-day preview period with these 998 pages. The revised Wilderness Evaluation Report was not available during the cooperating agency feedback period that ended in July. It was posted the same day as the DRLMP and DEIS for the public comment period, 8/13/2021.¹¹

The USFS GMUG states, "The best decisions will be made with input from all people who care about the GMUG..."¹² In the USFS's own words, a "key facet of this new Planning Rule is that it emphasizes the Forest Service's responsibility to engage with the public and to work more closely with State, local, and Tribal Governments when national forest managers amend or revise their forest plans."¹³

- A. Please see Ouray County's Cooperating Agency extension request dated July 6, 2021; DLRMP comments dated July 16, 2021; DLRMP/DEIS public comment period extension request letter dated October 26, 2021; and Commissioner Padgett's email to Assistant Forest Planner Jonathan Tucker dated November 1, 2021 for specific concerns about timing and supporting documents/files/StoryMaps omissions during the DLRMP/DEIS comment periods for Cooperating Agencies and Public. **These are attached in Appendix C to this letter.**

The DLRMP "Appendix 1: Maps" lists five sets of "revised plan and alternatives maps" as being available online "in PDF format" and "as an interactive ArcGIS StoryMap".¹⁴

¹¹ <https://www.fs.usda.gov/project/?project=51806>; accessed 11/21/2021.

¹² U.S. Department of Agriculture (USDA) U.S. Forest Service (USFS) GMUG. *Get Involved - Forest Plan Revision* [webpage]. <https://www.fs.usda.gov/detail/gmug/landmanagement/planning/?cid=fseprd500301> ; accessed 11/21/2021.

¹³ U.S. Department of Agriculture (USDA) U.S. Forest Service (USFS). (September 2016). *Trifold overview to A Guide for State, Local, and Tribal Governments* [Brochure]. Author. Retrieved July 12, 2021, from https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd530776.pdf; PDF Page 1.

¹⁴ U.S. Department of Agriculture (USDA) U.S. Forest Service (USFS). (August 2021). "Draft Revised Land Management Plan Grand Mesa, Uncompahgre, and Gunnison National Forests Delta, Garfield, Gunnison, Hinsdale, Mesa, Mineral, Montrose, Ouray, Saguache, San Juan, and San Miguel Counties, Colorado. Last retrieved October 6, 2021, from https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd939801.pdf; PDF Page 180 (document page 170).

Appendix 1. Maps

Draft revised plan and alternatives maps include:

- Management areas and overlays
- Desired recreation opportunity spectrum settings (summer and winter)
- Desired scenic integrity objectives
- Suitability for timber production
- Designated wilderness management areas

These maps are available online:

- in PDF format at: <http://www.fs.usda.gov/goto/DraftForestPlan>
- as an interactive ArcGIS StoryMap at: <http://www.fs.usda.gov/goto/DraftForestPlan>

The following draft revised plan maps are included here:

- Coal suitability assessment
 - Coal potential in the GMUG for alternative A (figure 7)
 - Coal potential in the GMUG for alternative B (figure 8)
 - Coal potential in the GMUG for alternative C (figure 9)
 - Coal potential in the GMUG for alternative D (figure 10).

- B. DLRMP Appendix 1. **As of November 21, 2021, ArcGIS StoryMaps for Desired Scenic Integrity Objectives and Suitability for Timber Production is still not available.** The public and even members of cooperating agencies cannot fully digest pdf maps which appear to be at a scale of 1:1,000,000, and do not have access to software or experts who can manipulate ArcGIS shapefiles. The StoryMaps is helpful to understand the range of alternatives and allow for informed comments from those who spend time on the GMUG forest and know it intimately.
- C. **The solicitation of informed public comments lacks specificity and transparency.** The Schedule of Proposed Actions (SOPA) 07/01/2021 to 09/30/2021¹⁵ states that the DEIS Notice of Availability (NOA) was published in the Federal Register on 06/03/2021. A broad search for the DEIS NOA on the Federal Register (search: Document Type = Notice, Agency=Department of Agriculture, Keyword=" Grand Mesa," Date Range=01/01/2017 to 11/21/2021)¹⁶ turned up the Notice of Intent to revise the DRLMP dated 4/3/2018, however, the DEIS NOA for a public comment period in 2021 was not found. A link to the formal NOA notification in the Federal Register of the DEIS is not provided on the GMUG Forest Plan Revision Process and Products webpage either. With assistance from Samantha Staley, the following sentence was located on August 13, 2021, Federal Register under the heading "Environmental

¹⁵ U.S. Department of Agriculture (USDA) U.S. Forest Service (USFS). *Schedule of Proposed Actions (SOPA) 07/01/2021 to 09/30/2021* [webpage]. <https://www.fs.fed.us/sopa/components/reports/sopa-110204-2021-07.html> ; accessed 11/21/2021.

¹⁶ Federal Register: A Daily Journal of the United States Government. (August 13, 2021). Environmental Impact Statements; Notice of Availability A Notice by the Environmental Protection Agency on 8/13/2021 [webpage and pdf]. https://www.federalregister.gov/documents/search?conditions%5Bagencies%5D%5B%5D=agriculture-department&conditions%5Bpublication_date%5D%5Bgte%5D=01%2F01%2F2017&conditions%5Bpublication_date%5D%5Blte%5D=11%2F21%2F2021&conditions%5Bterm%5D=Grand+Mesa ; accessed 11/21/2021.

Protection Agency Environmental Impact Statements; Notice of Availability" (page 44711). The mention cryptically reads in one sentence, "EIS No. 20210116, Draft, USFS, CO, Grand Mesa, Uncompahgre, and Gunnison Forest Plan Revision, Comment Period Ends 11/12/2021, Contact: Samantha Staley 970-852-9812."¹⁷

- D. **The GMUG "Public Reading Room" for the Grand Mesa, Uncompahgre, and Gunnison Forest Plan Revision #51806 does not seem to show all comments and organization names. It appears the cooperating agency comments are not included in the public reading room. The GMUG created a separate "Public Reading Room" for Wilderness Inventory and Evaluation comments. This reading room has disappeared from the GMUG Planning website.**

IV. Forest Plan Vision, Roles, Contributions.

- A. **"The Big Picture" vision continues to be awkwardly worded and emphasizes benefits people obtain through ecosystem services and multiple uses while missing the mark to also recognize the intrinsic value of ecological sustainability and ecological integrity.** We suggest incorporating the 2012 Forest Planning Rule (2012 FPR) language (blue) found in 219.1.c: "...promote the ecological integrity of these national forests." Through collaboration, education, and shared stewardship, these national forest lands are managed "so that they are ecologically sustainable and contribute to social and economic sustainability; consist of ecosystems and watersheds with ecological integrity and diverse plant and animal communities; and have the capacity to provide people and communities with ecosystem services and multiple uses that provide a range of social, economic, and ecological benefits for the present and into the future. These benefits include clean air and water; habitat for fish, wildlife, and plant communities; and opportunities for recreational, spiritual, educational, and cultural benefits."¹⁸
- B. **"The Big Picture" should not use the term "resilient ecosystems" without defining it.** Is this referring to "viable populations," meaning "persisting over the long term with sufficient distribution to be resilient and adaptable to stressors and likely future environments?" Perhaps this language instead should reference "ecologically sustainable landscapes supporting ecological integrity to reliably provide beneficial ecosystem services and multiple uses."
- C. The DRLMP Glossary needs to change the provided definition of Ecological sustainability (currently, "Ecological sustainability: The capability of ecosystems to maintain ecological integrity.") and recognize that **Ecological integrity is a component of Ecological sustainability. Ecological sustainability is defined as the maintenance or restoration of the composition, structure, and processes of ecosystems, including the diversity of plant and animal communities and the productive capacity of ecological systems (2012 FPR 219.36).**¹⁹
- D. Maintenance and restoration of **ecological sustainability** should be the highest priority for the management of national forests and grasslands so these lands can contribute to economic and social

¹⁷ <https://www.federalregister.gov/documents/2021/08/13/2021-17325/environmental-impact-statements-notice-of-availability> ; accessed 11/23/2021.

¹⁸ National Archives Code of Federal Regulations. Displaying title 36, up to date as of 11/18/2021. Title 36 was last amended 9/24/2021. <https://www.ecfr.gov/current/title-36/chapter-II/part-219> ; accessed 11/21/2021.

¹⁹ U.S. Department of Agriculture (USDA) U.S. Forest Service (USFS). Curt Flather, Rocky Mountain Research Station, Ft. Collins, CO, et. al. (Undated Draft). *Ecological Sustainability* [document]. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5130669.pdf ; accessed 11/21/2021.

sustainability by providing a sustainable flow of uses, values, products, and services (2012 FPR 219.2). The benefits sought from these lands depend upon long-term ecological sustainability, and planning will be based on the temporal and spatial scales necessary for sustainability.

- E. **Ecosystem diversity** and species diversity are components of **ecological sustainability** [2012 FPR 219.20 (a)].
- F. **The DRLMP Glossary contains the FPR definition of Ecological integrity:** "*The quality or condition of an ecosystem when its dominant ecological characteristics (for example, composition, structure, function, connectivity, and species composition and diversity) occur within the natural range of variation and can withstand and recover from most perturbations imposed by natural environmental dynamics or human influences.*" The definition in 2012 FPR 219.19 uses the word "influence" vs. "influences."
- G. The LRMP should accurately define "ecosystem," "ecosystem diversity," "resilient ecosystems," "ecosystem services," "ecological sustainability," and "ecosystem function," since scientific communities may think of these terms differently than intended and required by the 2012 FPR does in Title 36 Chapter II Part 219.²⁰ The 2012 FPR at 219.5.a.1 also requires assessments to evaluate "ecological" "sustainability." **The DLRMP Glossary should use the 2012 FPR 219.19 definitions of "Ecosystem" and "Ecosystem Services" and also include the 2012 FPR 219.19 definition of "Ecosystem diversity" provided in blue text below.**

Ecosystem. A spatially explicit, relatively homogeneous unit of the Earth that includes all interacting organisms and elements of the abiotic environment within its boundaries. An ecosystem is commonly described in terms of its:

(1) Composition. The biological elements within the different levels of biological organization, from genes and species to communities and ecosystems.

(2) Structure. The organization and physical arrangement of biological elements such as snags and down woody debris, vertical and horizontal distribution of vegetation, stream habitat complexity, landscape pattern, and connectivity.

(3) Function. Ecological processes that sustain composition and structure, such as energy flow, nutrient cycling and retention, soil development and retention, predation and herbivory, and natural disturbances such as wind, fire, and floods.

(4) Connectivity. (see connectivity above).

Ecosystem diversity. The variety and relative extent of ecosystems.

Ecosystem services. Benefits people obtain from ecosystems, including:

²⁰ National Archives Code of Federal Regulations. Displaying title 36, up to date as of 11/18/2021. Title 36 was last amended 9/24/2021. <https://www.ecfr.gov/current/title-36/chapter-II/part-219> ; accessed 11/21/2021.

(1) Provisioning services, such as clean air and freshwater, energy, fuel, forage, fiber, and minerals;

(2) Regulating services, such as long term storage of carbon; climate regulation; water filtration, purification, and storage; soil stabilization; flood control; and disease regulation;

(3) Supporting services, such as pollination, seed dispersal, soil formation, and nutrient cycling; and

(4) Cultural services, such as educational, aesthetic, spiritual, and cultural heritage values, recreational experiences, and tourism opportunities.

- H. The last bullet under Ecosystem Services and Multiple Uses (document page 9) mentions simply that hardrock miners contribute to "local and broader economies." **Please consider mentioning that hardrock minerals include base and precious metals that are critical mineral commodities essential to manufacturing renewable energy components. Please also mention that inactive/legacy mine reclamation to be an important sector in our local economy and an ongoing collaborative partnership between local, state, federal government agencies and NGOs to improve our watershed health and reduce impairments to our water quality.**
- I. We support and incorporate by reference the climate change and climate adaptation comments (pages 235-246) submitted by Matt Reed on behalf of High Country Citizens Alliance (HCCA) and two dozen conservation organizations.²¹

J. Forestwide Direction.

- A. Ouray County supports the technical forestwide direction requests contained in the Colorado Parks and Wildlife (CPW) Comments dated 11/24/2021. The technical comments and requests on forestwide direction are contained in the CPW Attachment 2.²² We are not ready to wholesale support the CPW original or revised route density methodology and related direction until the models of HPH and route density forestwide are made available for cooperating agencies and public to review.
- B. FW-OBJ-REC-03 was removed from the DRLMP between the working draft plan and this DRLMP. It stated, "Within 10 years of plan approval, ensure trails, parking lots, and trailheads associated with 14,000-foot peaks and other high-use areas include adequate maintenance schedules and infrastructure to deliver on desired sustainable recreation outcomes in light of increasing/changing use. Specifically, ensure trails to 14,000-foot peaks are reconstructed and/or realigned to be sustainable. Desired sustainable recreation outcomes include, but are

²¹ GMUG Public Reading Room: Matt Reed et al. (November 24, 2021). https://cara.ecosystem-management.org/Public/DownloadCommentFile?dmdId=FSPLT3_5697423 (links to GMUG Public Comment Reading Room document); accessed 11/24/2021.

²² Colorado Department of Natural Resources: Colorado Parks and Wildlife. (November 24, 2021). *CPW Comments Draft Forest Plan for the Grand Mesa, Uncompahgre, and Gunnison National Forests [letter]*. https://cara.ecosystem-management.org/Public/DownloadCommentFile?dmdId=FSPLT3_5697441 (links to GMUG Public Comment Reading Room document); accessed 11/25/2021.

not limited to, positive visitor satisfaction and consistency with desired ROS (recreation opportunity spectrum) settings." The justification for removal was that GMUG recreation staff did not believe this was attainable within existing/forecasted budgets and partnerships. Please add this back into the plan, with a caveat that budgets and partnerships provide the resources necessary. It appears that there are several congressional legislative vehicles that could increase funding for this important work. Ouray County is willing to help identify collaborative funding sources and strengthen partnerships.

- C. We have briefly reviewed forestwide direction recommendations from CNHP, High Country Citizens Alliance (HCCA) and partners submitted by Matt Reed, and Back Country Hunters and Anglers submitted for this public comment period on the DLRMP/DEIS. We are generally supportive of their requests for specific standards and guidelines.

V. **Recognition and conservation of fens and groundwater-dependent ecosystems are inadequate in the DRLMP.**

- A. **Management objectives, standards, and guidelines oversimplify and do not provide suitable recognition of fens as groundwater-dependent, peat accumulating wetlands.** "Fens are an important and unique wetland type. Fens are peat-forming wetlands that rely on groundwater input and require thousands of years to develop, and cannot easily be restored once destroyed. Fens are also hotspots of biodiversity. They often are home to rare plants, insects, and small mammals. Larger animals like deer and livestock graze in this type of wetland. Fens are valuable to humans as well. They are important as sites of groundwater discharge and are good indicators of shallow aquifers. Vegetation in all wetlands plays an important role in recycling nutrients, trapping eroding soil, and filtering out polluting chemicals such as nitrates. In addition, fens figure prominently in nearly all scenarios of CO₂-induced global change because they are a major sink for atmospheric carbon."-- Weixelman & Cooper 2009²³
- B. **GMUG should consult the research and publications of USDA USFS Rocky Mountain Research Station including Research Ecologist Kathleen Dwire.**²⁴ (Example, paper attached as Appendix D).
- C. Providing a 100-foot surficial buffer around a fen's expression of wetland vegetation or seasonally saturated soil and putting them into the same Category 2 as seeps, springs, lakes, and reservoirs is not adequate to manage the complex hydrology and unique ecology of fens. GMUG's management prescription for fens should emphasize a commitment to continued monitoring and assessment, conservation, and enhancement of fen systems. Ouray County BOCC appreciates the clear and direct approach to recognizing the importance of fens, their special ecosystem services, and appropriate management approaches directed at the groundwater system vs. lumping these critical wetlands with those dominated by surface water hydrology.
- D. The language and management prescriptions for fens found in the May 2020 Rio Grand National Forest Land Use Plan should be incorporated with GMUG DRLMP FW-GDL-RMGD-13 into a clear groundwater-dependent ecosystem section above the riparian management zone section will help assure us that complexity and importance of fens as peat accumulators are recognized by

²³ USDA USFS. Webpage. https://www.fs.fed.us/wildflowers/beauty/California_Fens/what.shtml

²⁴ <https://www.fs.usda.gov/rmrs/people/kadwire>

GMUG beyond valley riparian systems and will be appropriately managed. GMUG simply provides a guideline, while Rio Grande NF provides a clear standard that it will not authorize that alter fen hydrology.²⁵

Rio Grande LMP²⁶:

Groundwater-Dependent Ecosystems (GDE)

Groundwater-dependent ecosystems are a vital component for the natural environment and can include fens, wetlands, seeps, springs, riparian areas, groundwater-fed streams and lakes, and aquifers. These are present throughout the Forest and vary in size and timing. These areas provide an important ecosystem component and provide later-season flows with cold water temperatures, help sustain the function of surface and subsurface aquatic ecosystems, and provide habitat important to the persistence of plant species of conservation concern.

Areas that retain moisture and associated vegetation types have long been recognized as important for both ecosystem function and human benefits. Riparian areas and groundwater-dependent ecosystems such as wetlands, springs, aquifers, and fens provide ecosystem services that are necessary for the long-term health and well-being of both aquatic and upland areas.

Services provided by these areas are vital to the water supplies of downstream users. Services include stabilizing streambanks and reducing erosion, mitigating the impacts of floods, improving water quality by trapping sediment and other pollutants, and sustaining late season base flows. These areas are also vital to a wide variety of plants and animals. Aquatic and terrestrial species depend on the forage and cover provided in these habitat types, and many rare plants occur only in these ecosystems.

Management Approaches

Principal strategies and program priorities to protect groundwater-dependent resources

Fens and watershed conditions that support healthy fens provide irreplaceable ecological functions. The Forest continues to inventory and evaluate fens, thereby enabling managers to maintain healthy watersheds and aquatic resources.

The Forest continues to work with other agencies and adjacent landowners in the conservation of groundwater-dependent ecosystems.

Desired Conditions

DC-GDE-1: Identified groundwater-dependent ecosystems provide habitat for species of conservation concern and other native species. **Fens continue to accumulate peat.** (Forestwide)

Standards

S-GDE-1: **Do not authorize management actions that alter the hydrology of groundwater-dependent habitat features.** (Forestwide)

Guidelines

G-GDE-1: **To maintain ecosystem diversity and function, design projects to avoid or mitigate negative impacts to the ecological services that groundwater-dependent ecosystems provide.** (Forestwide)

²⁵ Page 29 of the GMUG May 2021 DRLMP: "FW-GDL-RMGD-13: To maintain ecological integrity and support native species (including at-risk species), design projects to avoid physical or chemical alteration of springs, fens and wetlands (e.g., ditching, damming, dewatering, dredging, filling, flooding, nutrient loading and changes to pH)."

²⁶ USDA USFS. (May 2020). *Rio Grande National Forest Land Management Plan*. [Plan and EIS]. Retrieved July 5, 2021, from <https://www.fs.usda.gov/main/riogrande/landmanagement/planning#:~:text=These%20plans%20guide%20the%20direction%20of%20specific%20projects,Forest%20for%20the%20next%2010%20to%2015%20years>; PDF. Plan pages 45 and 46.

- E. The extensive USFS research and best practices identified for mountain fen conservation, buffers, and fen inventory/assessment/monitoring should be incorporated into forestwide direction that guarantees protection of these unique groundwater-dependent ecosystems.
- F. The DRLMP must include updating the 2012 GMUG fen inventory²⁷ forest-wide within 5 years of the revised plan decision and include monitoring and assessment questions in the DRLMP monitoring framework (Chapter 4). See *A User Guide to Assessing Proper Functioning Condition for Fen Areas in the Sierra Nevada and Southern Cascade Ranges in California*.²⁸
- G. Incorporate additional forestwide direction protective of fens similar to those in the preferred alternative of the Sierra National Forest DLMP. For example, the *Revised Draft Land Management Plan for the Sierra National Forest* contains a forestwide range goal of "Work with stakeholders ensures livestock grazing management strategies minimize negative effects to the structure and function of vegetation and aquatic and riparian ecosystems, especially for small-scale special aquatic features such as fens and springs, as well as habitat and refugia for at-risk species."²⁹ Fens in the Sierra National Forest DLMP are considered special aquatic features and are subject to: "Aquatic and riparian special habitats (desert springs, seeps, and fens) are considered "special aquatic features" and relevant plan components are in the "Riparian Conservation Area" section. Desired Conditions (TERR-SH-DC) 01 The integrity of special habitats is maintained or improved from current conditions. The composition, diversity, and structure of unique plant assemblages are maintained in all areas, including those with multiple-use activities. 02 Microclimate or smaller-scale habitat elements provide habitat and refugia for species with a specific geographic or restricted distribution. 03 Conditions remain suitable for the long-term sustainability of the suite of native plants adapted to special habitats and their associated symbiotic associations, such as insect pollinators."³⁰ Furthermore, fens are mentioned in five Standards (WTR-RCA-STD) in the Sierra National Forest DRMP³¹:
- In fen ecosystems, limit disturbance from livestock and packstock to no more than 20 percent annually. Reduce disturbance further if a fen is nonfunctional or functional at risk with a downward trend.
 - Prohibit or mitigate ground-disturbing activities that adversely affect hydrologic processes that maintain water flow, water quality, or water temperature critical to sustaining fen ecosystems and the plant species that depend on these ecosystems.
 - Prevent activities from causing significant degradation of fens from trampling, such as by livestock, packstock, wheeled vehicles, and people.
 - **Assess the hydrologic function of riparian areas, meadows, fens, and other special aquatic features during rangeland management analysis. Ensure that characteristics of special features are, at a minimum, at proper functioning condition or functioning at risk and trending toward proper functioning condition,**

²⁷ USDA USFS GMUG. Johnston et al. (April 6, 2012) Inventory of Fens in a Large Landscape of West-Central Colorado Grand Mesa, Uncompahgre, and Gunnison National Forests [Report]. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5363703.pdf ; accessed 11/21/2021.

²⁸ USDA USFS. Weixelman & Cooper. (2009). *A User Guide to Assessing Proper Functioning Condition for Fen Areas in the Sierra Nevada and Southern Cascade Ranges in California*. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5385279.pdf

²⁹ [Revised Draft Land Management Plan for the Sierra National Forest \(usda.gov\)](#); Page 78.

³⁰ [Revised Draft Land Management Plan for the Sierra National Forest \(usda.gov\)](#); Page 44.

³¹ [Revised Draft Land Management Plan for the Sierra National Forest \(usda.gov\)](#); Page 18-19.

as defined in the appropriate technical report. If systems are functioning at risk, assess appropriate actions to move them towards the proper functioning condition.

- Complete initial inventories of fens within active grazing allotments prior to completing the allotment environmental analysis. If there are more than 10 fens in an allotment, complete initial inventories of at least 25 percent of all the fens in the allotment, and establish a 5-year schedule to complete inventory of the remaining fens in the allotment.

Desired Conditions (WTR-RCA-MEAD-DC) which respect the importance and uniqueness of fens, are provided in the Sierra National Forest DLMP³², and these desired conditions should be included in the GMUG DRLMP:

- Wetlands and groundwater-dependent ecosystems (including springs, seeps, fens, wet meadows, and associated wetlands or riparian systems) support stable herbaceous and woody vegetation communities that are resilient to drought, climate change, and other stressors. Root masses stabilize stream channels, shorelines, and soil surfaces. The natural hydrologic, hydraulic, and geomorphic processes in these ecosystems sustain their unique functions and biological diversity.
 - Fen condition is within the natural range of variation. Fens are resilient with continual peat accumulation and carbon sequestration. The hydrologic regime and vegetation, soil, and water characteristics sustain the fen's ability to support unique physical and biological attributes.
- H. We support the excellent comments and analysis submitted to GMUG by Gay Austin (November 2021) regarding the Watershed Conservation Practices Handbook (FSH 2509.25, 5/5/06) sections relative to fens and her recommendations.

VI. Wild and Scenic River Eligibility Evaluation

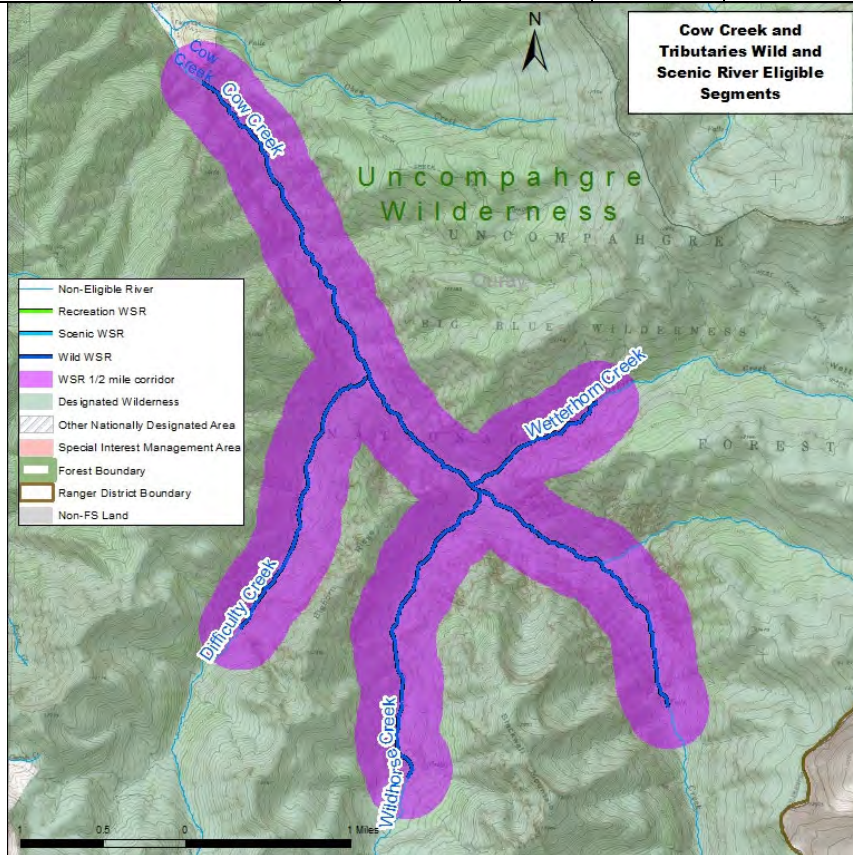
A. BOCC Unanimously Supports River Segments As Eligible for Wild & Scenic River Designation within Ouray County:

1. The Ouray County BOCC unanimously supports designating the four river segments found in Table 10.1 (excerpt below) and Figure 15 as eligible Wild and Scenic River segments, with the classification of Wild. We agree with comments submitted (November 2021) by High Country Conservation Advocates et al. regarding the DRLMP being too narrow in its consideration of ORVs for eligible segments. Cow Creek (24) and Tributaries Wetterhorn Creek (24-A), Wildhorse Creek (24-B), and Difficulty Creek (24-C) should be considered for the additional ORVs of wildlife, botany, and climate adaptation. We agree with others' comments that the USFS identification of essential boreal toad habitat merits a wildlife ORV. The presence of Tier 1 Rocky Mountain bighorn sheep (*Ovis Canadensis*), Black Swift (*Cypseloides niger*), and possibly boreal toad (*Bufo boreas boreas*) is justification for a wildlife ORV. CNHP ranks Cow Creek as possessing Very High Biodiversity significance, including excellent (A-ranked) occurrence of the globally imperiled (*G2G3/S2S3*) *Pseudotsuga menziesii*/*Paxistima myrsinites* lower montane forest and excellent (A-

³² [Revised Draft Land Management Plan for the Sierra National Forest \(usda.gov\)](#); Page 20-21.

ranked) occurrences of the globally vulnerable (G3/S3) *Populus angustifolia* - *Picea pungens*/*Alnus incana montane* riparian forest as well as excellent (A-ranked) occurrences of common riparian communities. A fair (C-ranked) occurrence of the state rare (G4/S2) New Mexico cliff fern (*Woodsia neomexicana*) is also documented. Please proceed in this direction in the final agency's preferred alternative.

Cow Creek (24) and Tributaries Wetterhorn Creek (24-A), Wildhorse Creek (24-B), and Difficulty Creek (24-C)	10.1	3,187	Ouray	Scenery, Geology (Add Botany, Wildlife, Climate Adaptation)	Wild
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DRLMP Figure 15 (USFS).

2. The Ouray County BOCC unanimously supports designating Bear Creek as an eligible Wild and Scenic River segment with the classification of Wild. Bear Creek is exceptional in the state reference area for a Scenery ORV, Geology ORV, and Recreation ORV. Bear Creek is free-flowing accessed via the extremely rugged Bear Creek National Recreation Trail. We agree with the description contained in the Great Old Broads for Wilderness comments on the DRLMP (November 2021). "*The scenery is spectacular with deep gorges, thundering waterfalls, dramatic cliffs, and golden aspen in autumn, qualifying Bear Creek for a Scenic ORV, which the GMUG recognizes in its Chapter 80 analysis. Geologic features including volcanic tuff pinnacles, iron-rich intrusions, and fossilized ripple marks qualify this segment for Geologic ORV. Recently published research by Dr. Dave Gonzales, a geology professor at Fort Lewis College, provides evidence of an Eocene paleocanyon cut into the San Juan*

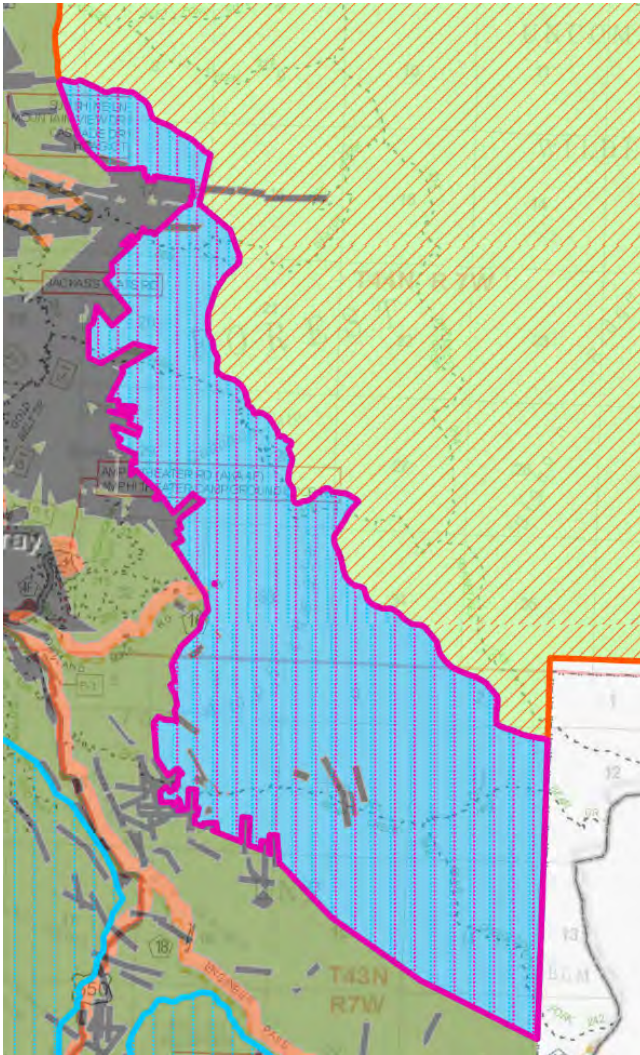
Formation volcanoclastics (Gonzales et al. 2021.) The mineralized waters of South Fork of Bear Creek possess that aqua quality similar to the Little Colorado and Havasu Rivers." We agree with other commenters that the Bear Creek NRT designation is related to the cascading waterfalls, dramatic cliffs of the gorge, and sections of bubbling flow over massive boulders. We disagree with the GMUG DRLMP/DEIS that the recreation along the Bear Creek NRT is not river-related. The NRT's unique and spectacular nature is related to both the geology and the river cutting through that geology to create a steep scenic gorge. The ripple marks in the Precambrian metasedimentary rock are astounding. Geology field camps from universities across the nation come to Bear Creek to examine the ripple marks and Precambrian rocks that are tilted to a near-vertical angle. GMUG has previously identified in a 2005 assessment that Bear Creek was eligible as a Wild and Scenic segment. Bear Creek intersects a Colorado Natural Heritage Program (CNHP) Potential Conservation Area with high biodiversity significance. Please proceed in this direction in the final agency's preferred alternative.

3. American Whitewater has documented the segment of the Uncompahgre River, free-flowing from Red Mountain Creek to the Ouray Ice Park, to a point just above the Ouray Hydro Impoundment qualifies as eligible. ORVs are Recreation, Geology, and Scenery. This reach is described as remote and technically challenging with Class IV-V whitewater for kayaking. Eligibility should not consider water quality or highway proximity as limiting factors. There are no road or trail intersections on this segment. A description and map of the segment, along with photos of kayakers, can be found here:
<https://www.americanwhitewater.org/content/River/view/river-detail/5769/gallery>.

VII. Management Area Direction

A. Areas to be Analyzed as Wilderness:

1. **Unanimous BOCC support to include the "Bear Creek Addition to the Uncompahgre Wilderness" in the agency's preferred alternative as "Area to be Analyzed as Wilderness (MA 1.2)." The preferred alternative should incorporate two of the "Community Conservation Proposal" proposed wilderness parcels as "Recommended Wilderness." In our July 6 letter, we indicated clear unanimous support from the Ouray County Board of County Commissioners (BOCC) for the Bear Creek Addition to the Uncompahgre Wilderness being incorporated into the agency's preferred alternative with a recommendation for designation of Wilderness. We subsequently provided Jonathan Tucker the GIS shapefile of this approximately 6,000-acre parcel, and it was determined that the lands within the proposed Bear Creek Addition parcel are considered in the DRLMP Alternative D. **In addition, for this parcel, the Summer and Winter Recreational Opportunity Spectrum (ROS) in the agency's preferred alternative should be the same as provided in Alternative D, Primitive. The Timber Suitability in the agency's preferred alternative should be the same as provided in Alternative D (no timber suitability identified).****

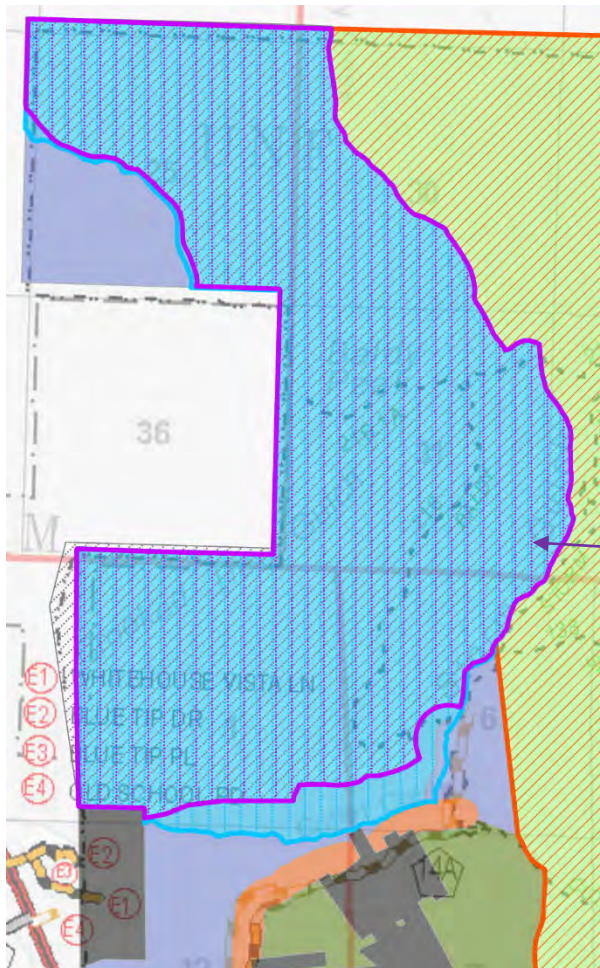


Left: Screen-shot of the proposed Bear Creek addition to the Uncompahgre Wilderness parcel (bright pink outline). It is very closely aligned to the Alternative D: Area to be Analyzed as Wilderness (MA 1.2) in bright blue. The base map is our County Road and Public Access Routes map.

We support the Ouray Silver Mines Inc. November 2021 public comments regarding allowing underground fringe leases of locatable minerals under unpatented claims located in the northern portion of the Bear Creek Recommended Wilderness parcel towards County Road 14. Fringe leases do not allow for surface disturbance. These uses are compatible with the wilderness characteristics of the exceptional Bear Creek parcel. We support continuing the existing annual Hardrock 100 foot race, which uses the Bear Creek National Recreation Trail one or two days a year.

2. **Unanimous BOCC support to include the "Baldy Addition to the Uncompahgre Wilderness" in the agency's preferred alternative as "Area to be Analyzed as Wilderness/Colorado Roadless Area (MA 1.2/3.1)." Since July 6, the Ouray County BOCC has carefully examined the 2,400-acre parcel called "Baldy Addition" to the Uncompahgre Wilderness" contained in the Community Conservation Proposal. We note that the "Baldy C&H" grazing allotment is mapped in both the existing designated Uncompahgre Wilderness while also extending into the 2,400-acre proposed Baldy Addition and therefore did not present a conflict. We identified that the extreme south/southeastern Community Conservation Proposal polygon extends beyond the "Baldy" Colorado Roadless Area parcel. We have modified the boundary from the Community Conservation Proposal (which you may have received from another source) to show the area we support being included in the final agency's preferred alternative as "Recommended Wilderness," matching the south/southeastern limit of the Baldy Roadless parcel. The lands within the proposed Baldy Addition to the Uncompahgre Wilderness are currently considered in the DRLMP Alternative D. **In addition, for this parcel, the Summer and****

Winter Recreational Opportunity Spectrum (ROS) in the agency's preferred alternative should be the same as provided in Alternative D, Primitive. The Timber Suitability in the agency's preferred alternative should be the same as provided in Alternative D (no timber suitability identified). Planned thinning and prescribed burn treatments designed for wildlife habitat enhancements are compatible with this designation.



Left: Screen-shot of the proposed Baldy addition to the Uncompahgre Wilderness parcel (bright purple outline). It is very closely aligned to the Alternative D: Area to be Analyzed as Wilderness/Colorado Roadless Area (MA 1.2/3.1) in bright blue; however, we would like the southeast portion of this parcel to be clipped to the existing Baldy-Colorado Roadless Area (diagonal gray hatching) as depicted in the bright purple outline. The basemap is the Ouray Draft Road Map 2009 - a transportation map showing public access routes.

*Baldy Roadless Area with a purple outline showing the portion of the community proposal's "Baldy Addition" that Ouray County BOCC supports as "Area to be Analyzed as Wilderness/Colorado Roadless Area" (MA 1.2/3.1).

We have previously provided GMUG with Community Conservation Proposal fact sheets regarding the conservation values and outstanding wilderness characteristics for both the Baldy Addition and the Bear Creek Addition. We have also previously provided the shapefiles of the two wilderness parcels that we support being recommended as Wilderness.

We are grateful that both Alternatives B and D include the lands within the Colorado Outdoor Recreation and Economy (CORE) Act and preceding San Juan Wilderness Act as Recommended Wilderness. **Please ensure that the final alternative includes these CORE Act parcels as Recommended Wilderness. The final alternative should also include the CORE Act Special Management Areas (SMAs) as SMAs.**

B. Lands within the Community Conservation Proposal (previously known as Citizens' Conservation Proposal) Mount Abram Scenic Special Interest Area parcel:

1. The BOCC believes that the objectives of the Community Conservation Proposal for a Mount Abram Scenic Special Interest Area can be achieved through a combination of appropriate Management Area classification, winter/summer ROS classifications, and Timber Suitability. Preserving scenic resources is essential on this parcel. We support an SIO of "High" consistent with Alternative D and the San Juan Skyway scenic byway corridor. The lands within the Mount Abram Mountain parcel seem to be mismatched in the Alternative A existing Management Area (MA) classification vs. the existing ROS classifications. The existing ROS is semi-primitive non-motorized (SPNM), but the existing MA is provided in the GMUG's GIS as semi-primitive motorized. Alternatives B and D continue the mismatch to some degree.

Regardless, the agency's preferred alternative should be Semi-Primitive Non-Motorized Recreation Activities (MA: 3A). Both the summer and winter ROS in the agency's preferred alternative should be consistent with this existing characteristic and be SPNM. The Timber Suitability should be similar to Alternative D – no suitability above 40% slope. There are less than four acres of suitable timber within this parcel in Alternative D. However, Alternatives C and B identify hundreds of acres of suitable timber for slopes between 40-123%, which is incompatible with the special conservation and scenic values. The Iron-ton fen and wetland complex at the toe of these slopes provide important ecosystem services and is sensitive to hydrological disturbances and sedimentation. To preserve the non-motorized uses, scenic integrity, and special characteristics of this parcel and Iron-ton area, **the agency's preferred alternative should not include any Timber Suitability within this parcel. It is a fatal flaw of the DRLMP to manage the lands within the Abram parcel as "General Forest," which is currently the management category provided in Alternative B.**



At left is the Mount Abram Scenic Special Interest Area parcel (bright blue boundary center-right), described in the Community Conservation Proposal. The jade-green outlined areas are fens mapped by Colorado Natural Heritage Program (CNHP) and Mountain Studies Institute. The USFS geospatial clearing house trails TrailNFS_Publish layer shows the Gray Copper Gulch trail is non-motorized where it passes through the Abram parcel. The Brown Mountain Road shown penetrating the western boundary of the parcel is actually gated closed west of the parcel, and there is no motorized access.

- *Gray Copper Gulch Trail
- *Brown Mountain Road
- *Crystal Reservoir
- *Fen Complex (wetlands on the east side of US 550 not shown).

C. Lands within the Community Conservation Proposal (previously known as Citizens' Conservation Proposal) Hayden Mountain Special Interest Area parcel:

1. Most stakeholders, including Ouray County BOCC, do not want the Hayden Mountain parcel to be General Forest and prefer that Hayden Mountain retains its current management and trail system. Hayden has important big game and wildlife habitat. No Lands Suitable for Timber should be identified on Hayden Mountain, as almost all of the slopes are greater than 40%, and the lands are directly above a complex of wetlands and fens adjacent to Crystal Reservoir. Any timber harvesting should be primarily designed for wildlife habitat enhancement, forest health and safety objectives. Hayden Mountain is prominent in the San Juan Skyway Scenic Byway viewshed, and is one of the most photographed areas during fall colors. The northern

portion of the Hayden parcel especially should have an ROS of primitive with a very high scenic integrity.

2. In July 2021 during the abbreviated cooperating agency "preview" and input period, the Ouray County BOCC believed that the objectives of the Community Conservation Proposal for the Hayden Mountain Special Interest Area could be achieved through a combination of appropriate Management Area classification, winter/summer ROS classifications, and Timber Suitability. It is essential to preserve the scenic resources with the highest degree of scenic integrity possible to preserve (and not degrade) scenic resources on this parcel. The lands within the Hayden Mountain parcel also seem to be mismatched in the Alternative A existing Management Area (MA) classification vs. the existing ROS classifications. The existing MA category (Alternative A) is semi-primitive motorized in the southern half to primitive non-motorized in the northern half. However, the existing (Alternative A) is SPNM throughout the parcel. Alternatives B and D continue the mismatch by proposing a "General Forest" management category.

With further study, the BOCC can support the Hayden Mountain parcel as being a Special Interest Area to retain the management direction and characteristics of this parcel. When we are provided with the full trail/route density modeling and HPH that GMUG has received and considered from CPW, we may support Hayden Mountain as being a Wildlife Management Area.

Regardless, as requested in our cooperating agency comments, the agency's preferred alternative should be Semi-Primitive Non-Motorized Recreation Activities (MA: 3A). Both the summer and winter ROS in the agency's preferred alternative should be consistent with this existing characteristic and be SPNM. The Timber Suitability should be similar to Alternative D, modified as requested above, and with absolutely no timber suitability on slopes greater than 40%. There are less than 18 acres of suitable timber within this parcel in Alternative D. However, Alternative B identifies roughly 3,200 acres of suitable timber. The parcel is 10,400 acres total. The mean slope of the suitable timber in Alternative B within this Hayden Mountain Special Interest Area parcel appears to be 59%, using ArcGIS analysis tools. It appears that less than 300 acres out of the 3,200 acres of identified suitable timber in Alternative B are on slopes less than 40%. **The agency's preferred alternative B shows suitable timber in and adjacent to fen and wetland complexes which is unacceptable for protecting these critical resources and the CNHP Potential Conservation Area in the northeastern portion of the Hayden parcel and valley floor. There are no existing roads above where the so-called suitable timber is mapped, so to harvest, roads would have to be cut in. This area is incompatible with harvesting timber on slopes from 40-105%. The Ironton fen and wetland complex at the toe of these slopes provide important ecosystem services and is sensitive to hydrological disturbances and sedimentation. To preserve the non-motorized uses, scenic integrity, and special characteristics of this parcel and Ironton area, **the agency's preferred alternative should not include any Timber Suitability within this parcel. It is a fatal flaw of the DRLMP to manage the lands within the Hayden parcel as "General Forest," which is currently the management category provided in Alternative B instead of semi-primitive non-motorized.****

Below is a screenshot showing the geospatial relationships of CHNP and MSI fens, CNHP Potential Conservation Areas having high bio-diversity and special ecosystems, and the Timber Suitability identified in Alternative B. This parcel should be managed to retain roadless and primitive to semi-primitive characteristics, special habitats and ecosystems, and non-motorized public access routes.

While Spirit Gulch does have a double-track leading up to a private interest, it is our understanding that this route is currently unused and revegetating. The Mears trail and County Road 20W at the west edge of Long Park and Crystal Reservoir allow for mechanized use, but not motorized, which is controlled by a locked gate near the Crystal River dam and Highway 550. It appears that there are several existing non-motorized trails missing from the USFS NSF trails GIS file downloaded from the USFS national geospatial data clearinghouse the week of July 11, 2021, and also missing from the USFS trails and road MVUM GIS layers. **Please compare the County Road and public access route documents^{33,34,35} to your trails inventory within this parcel and the Abram parcel.** These maps were products resulting from several years of meetings of the interagency collaborative Public Access Group, which sought to identify historic public access routes in Ouray County, regardless of jurisdiction. USFS, along with the Ouray Trails Group and Ouray County Historical Society, participated in the Public Access Group. These non-USFS system public access routes are unmaintained and lightly used.

³³ Ouray County IT Department. (2009). *Ouray Draft Road Map 2009 - transportation map ONLY, NOT up to date w/current Official County Road Map*. [Map]. Bockes, Jeff. Retrieved July 12, 2021, from <https://ouraycountyco.gov/DocumentCenter/View/152/DRAFT-2009-Road-Map-transportation-only-not-Official-road-map?bidId=> ; PDF. (Note: This is A draft (2009) 48" x 36" map showing County Roads and Other roads (private, Forest Service, etc.), useful to navigate in Ouray County. See 'Official County Road Map for the current County- maintained routes.)

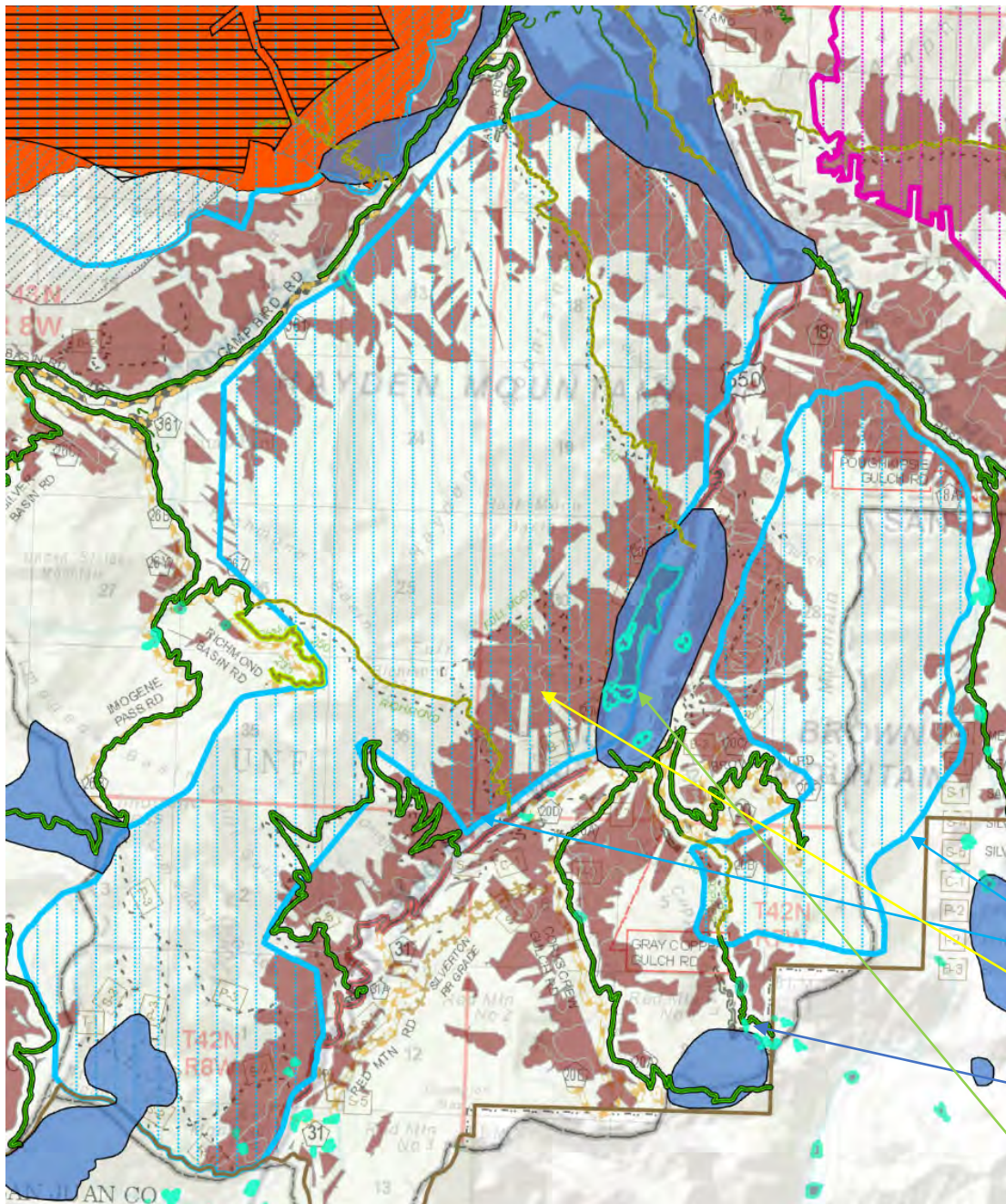
³⁴ Ouray County. (2014). *Official Ouray County Road Map, July, 2014 - showing Public Routes ONLY, not a complete transportation map*. [Map]. Ouray County Board of County Commissioners and Bockes, Jeff. Retrieved July 12, 2021, from <https://ouraycountyco.gov/DocumentCenter/View/2476/2014-014-Exhibit-A---Ouray-County-Road-Map?bidId=> ; PDF. (Note: Official County Road Map, showing County maintained routes and other Public Routes in the county. NOT a complete transportation map, - private routes, etc. not shown. (Resolution 2014-014, Exhibit A).)

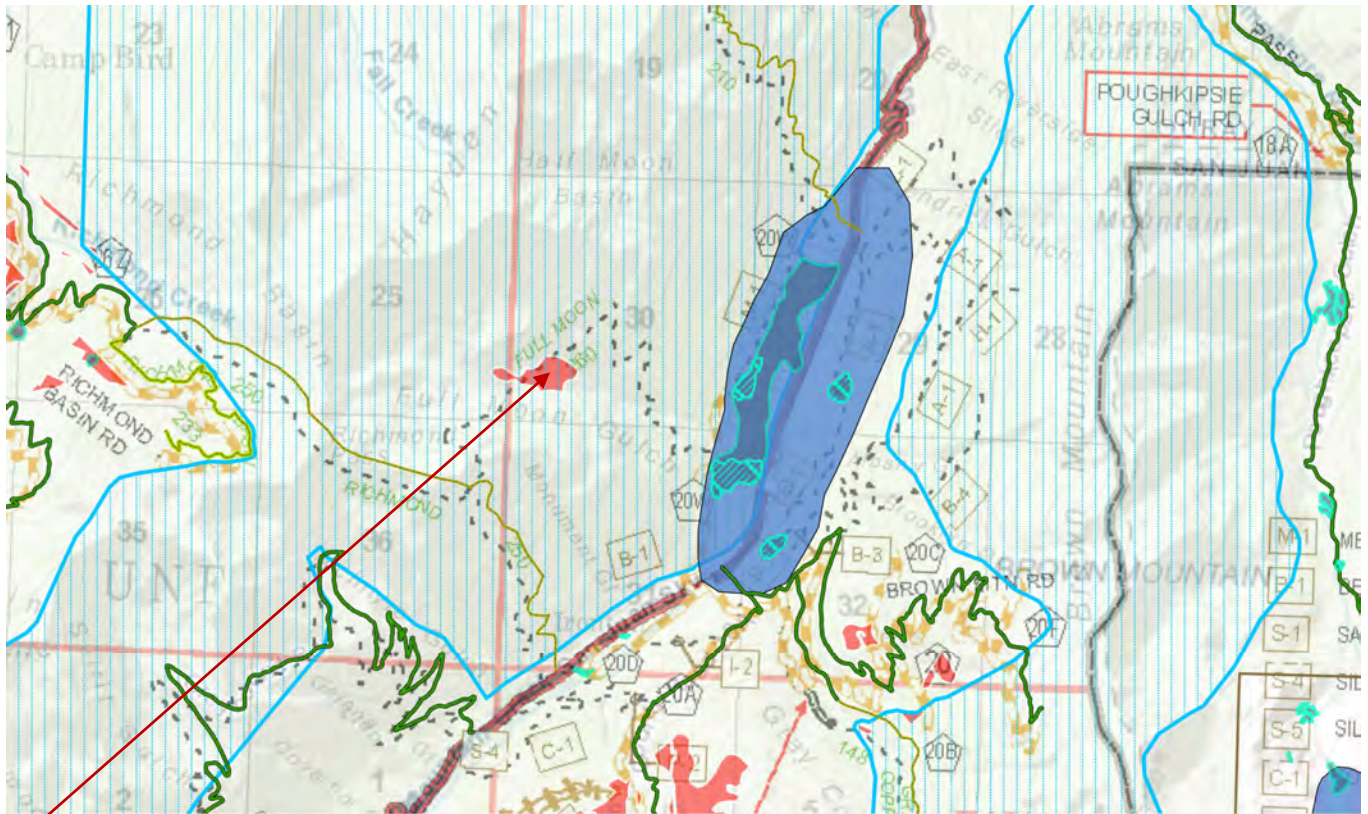
³⁵ Ouray County. (2014). *Ouray County Historic Route Index*. [Index]. Ouray County Board of County Commissioners and Bockes, Jeff. Retrieved July 12, 2021, from <https://ouraycountyco.gov/DocumentCenter/View/2477/2014-014-Exhibit-B---Ouray-County-Historic-Route-Index?bidId=> ; PDF. (Note: Chart showing historic and current mapping and other documents which support Public Routes shown on the Official Ouray County Road Map (Resolution 2014-014, Exhibit B).)

This figure is a screenshot showing the Abram parcel on the east (right) and the Hayden Mountain Special Interest Area parcel on the west (left). The agency's preferred Alternative B Timber Suitability is visible in brown. The timber identified is mostly greater than 40% slopes as discussed above and would compromise

critical fen and wetland complexes. These complexes are seeing an increased presence of moose. In blue are CNHP "Potential Conservation Areas," which are described as having special and sensitive biodiversity characteristics that should be conserved. The basemap is the Ouray Draft Road Map 2009 - a transportation map showing public access routes.

- *Abram parcel
- *Hayden parcel
- *DRLMP Alternative B Timber Suitability (brown)
- *CNHP PCAs (dark blue)
- *CNHP and MSI fens





*Alternative B Suitable Timber within the Hayden and Abram parcels consists of one 17.8-acre polygon. Compare to the roughly 3,200 acres of Alternative D Suitable Timber within just the Hayden parcel above. Despite GMUG's contention that a tiny percentage of suitable timber occurs on steep slopes, the agency's preferred alternative is predominantly steep-slope timber within the areas described in this comment letter.

Showing a 1:24,000 scale close-up of the Abram and Hayden parcels. Red is the DRLMP Alternative D Timber Suitability. There is only one 17.8-acre polygon within these parcels combined. This highlights how different Alternative D and B are for Timber Suitability. The DRLMP needs to re-think Timber Suitability for its preferred alternative. This close-up also shows Full Moon and other trails not within the NSF Trails, Trails MVUM, and Roads MVUM GIS data layers downloaded from the USFS national geospatial clearinghouse (<https://data.fs.usda.gov/geodata/edw/datasets.php>) around July 11, 2021.

3. **Existing designated Wilderness is downgraded from primitive to semi-primitive ROS in the current DRLMP agency's preferred alternative B.**

- A. The agency's preferred alternative B does not place existing designated Wilderness in the Primitive ROS. Alternative D does have existing Wilderness, the Baldy Colorado Roadless Area/proposed Baldy Addition to the Uncompahgre Wilderness, and the proposed Bear Creek Addition to the Uncompahgre Wilderness as Primitive ROS. **The Alternative D ROS should be incorporated into the agency's preferred alternative for existing Wilderness.** Wilderness areas are our most primitive areas and should remain primitive.
- B. The agency's preferred alternative B also does not keep proposed CORE Act/San Juan Wilderness Act Addition parcels known as Whitehouse Mountain East and Whitehouse Mountain West as Primitive ROS. **The Alternative D ROS should be incorporated into the proposed CORE Act/San**

Juan Wilderness Act Addition parcels – Whitehouse Mountain East and Whitehouse Mountain West.

- C. As part of the same downward pattern, the agency's preferred alternative seeks to move Hayden and Abram areas into the General Forest MA instead of continuing to manage as semi-primitive non-motorized, which we disagree with and discussed above.

Overall, the Alternative D ROS and Scenic Integrity, with modifications and corrections, should be incorporated into the agency's preferred alternative within the Ouray Ranger District.

Our comments in this letter and the multi-county collaborative letters jointly submitted in July 2021 and November 2021 reflect our recommendation for the GMUG to refine Alternative D into a revised agency preferred alternative. We will continue to work with the GMUG collaboratively and productively throughout the rest of the planning process. Please do not hesitate to contact us with any questions about our comments.

Respectfully submitted,



Ben Tisdal, Chair



Lynn M. Padgett, Vice-Chair



Jake Niece, Member

Attachments:

1. Appendix A: Ouray County comment letter on scoping issues for the Blue Lakes Trail and affected portion of Sneffels Wilderness dated October 19, 2021.
2. Appendix B: Recent Ouray County Traffic Counts
3. Appendix C: Ouray County letter to GMUG Ouray Ranger District regarding allowing USFS lands to participate in a Time Critical Removal Action in Governor Basin dated November 23, 2021.
4. Appendix D: Ouray County DRLMP public comment deadline extension request letter and documentation dated October 26, 2021.
5. Appendix E: *Brief Synopsis of Available Science on Buffer Effectiveness for Conservation of Mountain Fens, USFS Rocky Mountain Region (R2)* dated February 25, 2020. Author: USDA USFS Rocky Mountain Research Station Research Ecologist Kathleen Dwire.
6. Appendix F: Ouray County "Fatal Flaw" Cooperating Agency comments on the May 2021 DRLMP dated July 16, 2021.

cc. John Whitney, Western Slope Regional Director, U.S. Senator Michael F. Bennet; Helen Katich, Southwest Regional Representative, U.S. Senator John Hickenlooper

- 1. Appendix A: Ouray County comment letter on scoping issues for the Blue Lakes Trail and affected portion of Sneffels Wilderness dated October 19, 2021.**



BEN TISDEL
LYNN M. PADGETT
JAKE NIECE

BOARD OF COUNTY COMMISSIONERS

P.O. Box C • Ouray, Colorado 81427 • 970-325-7320 • FAX: 970-325-0452

October 19, 2021

Ouray Ranger District, Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG)
Julie Jackson
Recreation Staff Officer, Ouray Ranger District
2505 S Townsend Ave
Montrose, CO 81401
Phone: 970-240-5429
Via email: julie.jackson@usda.gov

RE: Comments on the Blue Lakes Visitor Study Area survey

Dear Ms. Jackson,

Thank you for the opportunity to provide information and feedback to the U.S. Forest Service (USFS) regarding the Blue Lakes visitor study area through a survey via an ArcGIS Story Map website. On October 13, 2021, there were almost 40 comments pinned to the Blue Lakes Visitor Study ArcGIS Story Map.¹ We understand from the USFS GMUG Ouray Ranger District text narrative provided, that the Ouray Ranger District is gathering information and feedback on the Blue Lakes study area to help the Ouray Ranger District and GMUG officials determine a "Purpose and Need" and a "Proposed Action" for future actions in the Blue Lakes Area. According to the story map, the USFS will conduct a public "Scoping" (issue identification process) after a Proposed Action (PA) has been developed followed by an Environmental Impact Study (EIS).

We understand that information helpful to the USFS includes:

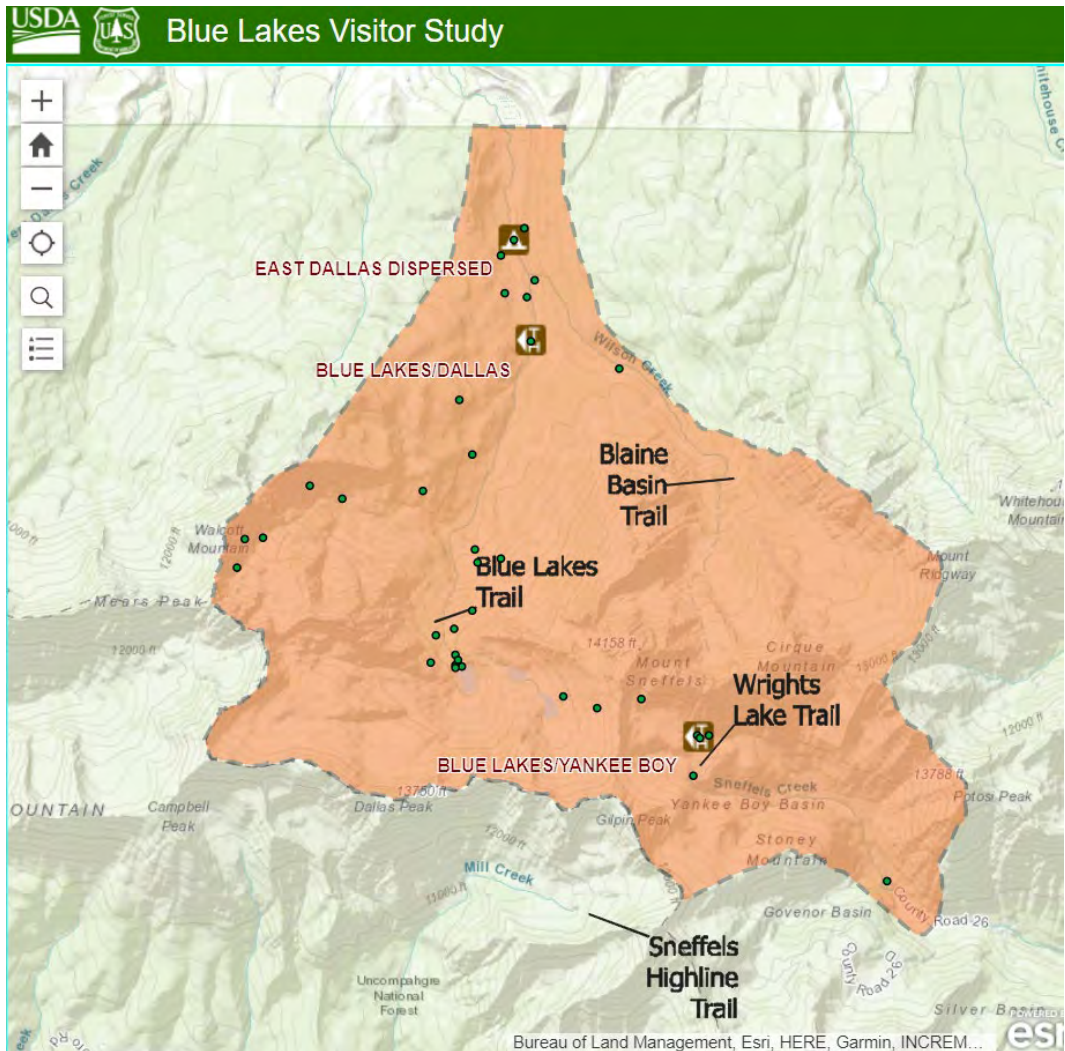
- *"What and where are you seeing issues in the area?"*
- *Are there specific management recommendations you would like to see implemented to address those issues? If yes, what would those be?*
- *The Blue Lakes are within the Mount Sneffels Wilderness. What is your definition of solitude when recreating within a wilderness area?*
- *What would be an acceptable number of people you would like to encounter when in the area?*
- *Is there resource information you are aware of that could prove useful to consider during planning (i.e., presence of species that could affect management decisions, cultural resource information, etc.)²*

The Ouray County Board of County Commissioners is choosing to provide information and feedback through this letter because our comments are related to the Blue Lakes Study Area (map below) as a whole and not at a single pin location.

We wonder if the 700 to 800 views of the Blue Lakes Study Area Story Map might have produced a greater number of comments if the GMUG had provided links to the relevant GMUG Mount Sneffels Wilderness and Blue Lakes #201 trail web pages, along with a narrative explaining existing uses and restrictions.

¹ <https://usfs.maps.arcgis.com/apps/MapJournal/index.html?appid=872dae462d8a47058078b784ce0df60a>; accessed October 13, 2021.

² <https://usfs.maps.arcgis.com/apps/MapJournal/index.html?appid=872dae462d8a47058078b784ce0df60a>; accessed October 13, 2021.



USFS GMUG Blue Lakes Visitor Study Area Map. Green pins are geo-located comments submitted via the web app, accessed on October 13, 2021.³

The number of day-use and camping visitors appears to have increased dramatically within the last 5 years. Conflicts and recreational resource damage is dramatic and distressing to the BOCC and local stakeholders. It has been publically discussed in various forums within Ouray County for several years, especially in 2020 and 2021. We think the September 2020 ArcGIS Story Map produced jointly by Abe Proffitt, USFS Ouray Ranger District and Western Colorado University⁴ provides a summary of the conditions and degradation being caused by recreational overuse of the Blue Lakes area, and should have been linked to the survey Story Map.

The Blue Lakes Study Area issues that must be addressed and resolved include:

- Recreational overuse and lack of “Leave No Trace” etiquette being adhered to by visitors have caused ecosystem degradation of the fragile alpine tundra, riparian, and lacustrine ecosystems;
- Unsustainable trail widening, braiding, and creation of social “spur” trails is creating erosion and harm of tundra, meadows, and water bodies providing native cutthroat trout habitat;
- Human sanitation issues and inappropriate human waste (and used toilet paper) accumulation from hundreds of daily visitors mars the environment and scenic beauty of the Sneffels Wilderness;

³ <https://usfs.maps.arcgis.com/apps/MapJournal/index.html?appid=872dae462d8a47058078b784ce0df60a>; accessed October 13, 2021.

⁴ <https://storymaps.arcgis.com/stories/16e526fc458f4c2aa989454c00141cde>; accessed October 13, 2021.

- Loss of wild or wilderness characteristics, especially solitude and pristine plant and wildlife habitat is a significant issue. There are dozen(s) of tents reported at the lakes, especially Lower Blue Lake, and hikers encountering literally hundreds of other campers on the trail in a single day. Current GMUG Wilderness restrictions limit group sizes to 15 people. This should be reconsidered, so that group sizes and the maximum number of humanity to be encountered in a single day or night provides a wilderness experience;
- Unsafe traffic volumes and inadequate vehicle parking (100 or more on a busy day) leading to overflow vehicles getting parked on County Road 361 and switchbacks, causing further choking and safety on this high-clearance, 4WD road;
- Blue Lakes being described and advertised on dozens of regional, state, and national websites as one of the top attractions/things to do in Ouray-Telluride;
- Lack of clear and specific communication and/or enforcement of current Blue Lakes use restrictions on the GMUG Mount Sneffels web page⁵. This page should, but does not, hot link directly to the GMUG Mount Sneffels Wilderness-specific wilderness regulations rather than requiring astute and patient web site users to accidentally find the Mount Sneffels-specific wilderness regulations⁶. The GMUG Mount Sneffels web page which simply states that
 - “Camp sites in the Blue Lakes are limited in number” (unfortunately, no map or information on the actual number of campsites or what marks campsites is provided);
 - “Campfires are prohibited in the Blue Lakes area”;
 - “No camping within 100 feet of water and designated trails in the Blue Lakes area.”
- Failure of GMUG to mention or cross-link the current Blue Lakes use restrictions on the GMUG Blue Lakes #201 (trail specific) web page is a lost opportunity for user education and outreach.⁷ The use restrictions above, and the prohibition of camping at the Blue Lakes – Yankee Boy Trail Head need to be mentioned more clearly and comprehensively on both the Mount Sneffels and Blue Lakes #201 web pages. The Mount Sneffels general web page provides “at a glance” information on Norwood Ranger District trails with no relevant info on Blue Lakes #201, which is in the Ouray Ranger District.⁸ There is a lack of GMUG enforcement of these regulations.
- Volume of complaints and Search and Rescue calls requiring Ouray County Sheriff and Ouray County Search and Rescue response.

Ouray County stakeholders and citizens are extremely distressed and motivated to be proactive in protecting the Blue Lakes area and greater Yankee Boy Basin areas, with preventing resource damage from lack of sanitation as a key priority. In 2019, the Colorado Tourism Office named Blue Lakes a “hot spot” because of visitor volume (300+ hikers, dozens of campsites, and 100 vehicles daily) and worked with local and regional stakeholders to provide Leave No Trace trainings⁹. In 2017, several local Ouray County Jeep Companies and other Business Professionals banded together to assemble the Six Basins Project, a 501(3)(C) organization created to protect and preserve the landscape and heritage of the six basins located within the Yankee Boy and Imogene areas. Through funds voluntarily collected with the rental of a Jeep or other OHV, additional grants and donations, Six Basins projects are providing user education through signage, improved sanitation in the 2017 existing restroom sites and constructing new restroom sites. They also desire to provide funding of law enforcement on County Road 361¹⁰.

In 2019, the Ouray Silver Mines provided Six Basins Project, Inc. with a 99-year lease for a new restroom site located at the Torpedo Eclipse Boarding House location, near the intersection of County Roads 26 and 361, the gateway to Imogene and Yankee Boy Basins. The US Forest Service signed a maintenance agreement with Six Basins for the USFS to clean and service the restroom, valued at over \$100,000. This restroom mitigates sanitation issues by being accessible to motorized day users as they motor on the alpine road system. This level

⁵ <https://www.fs.usda.gov/recarea/gmug/recarea/%3Frecid%3D80858>; accessed October 13, 2021.

⁶ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3807986.pdf; accessed October 13, 2021.

⁷ <https://www.fs.usda.gov/recarea/gmug/recarea/?recid=32558>; accessed October 13, 2021.

⁸ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3807986.pdf; accessed October 13, 2021.

⁹ https://www.tellurideneews.com/the_watch/news/article_b24fcc2a-aeaa-11e9-99ed-431c7919228e.html; accessed October 14, 2021.

¹⁰ <https://sixbasinsprojectinc.com/>; accessed October 13, 2021.

of fundraising and cooperation demonstrates the local commitment to preventing recreational resource damage and the importance of the Yankee Boy Basin and Blue Lakes Study Area.¹¹

In 2021, the Ridgway Ouray Community Council (ROCC) collaborated with the Ouray Ranger District 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 USFS did not allow volunteers to have an educational presence at the Yankee Boy Basin/Blue Lakes Trail Head, which is the access point for a significant number of hikers and campers. **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.** Their report comments note that hunter OHVs went around the gate and entered the area.

- A volunteer on July 2, 2021, commented, “Only 3 of the 72 people who we met at the trailhead said they were hiking the Blaine Basin trail. The rest were going up to Blue Lakes.”
- A volunteer on July 24, 2021, commented, “... 126 people counted at trail head from 7AM to 10AM. I counted 93 cars parked all over on the way out at noon. I hiked part of the Dallas 200 to Blaine Basin and only encountered about 10 people between 10 and Noon.”
- On July 31, 2021, a volunteer commented, “Everyone was happy to see us there and thanked us. A backpacker told us that there were about 20 tents in the lower basin last night, Friday. Yikes, that's a lot of cat holes!” The ROCC spreadsheet shows that only 4 backpackers were counted by volunteers on July 31, suggesting that the majority of the tents backpacked in from the Yankee Boy Basin side.

Going forward to scoping, identifying a Purpose and Need, and Proposed Action, the Ouray County Board of County Commissioners advises that **GMUG should identify a range of actions and alternatives that incorporate monitoring, evaluation, assessment, and adaptation to ensure the desired conditions at Blue Lakes are achieved.**

Desired conditions should allow for protecting and restoring wilderness characteristics by controlling visitor use levels and sanitation; protecting water resources and native fish habitat; protecting and restoring fragile alpine tundra, wildflower meadows; and riparian ecosystems; ensuring proper human waste and toilet paper disposal; ensuring Leave No Trace practices are adhered to; and facilitating public safety and sustainable parking off of county and forest roads.

We recommend consideration of strategies such as:

- Resting and repairing the damaged Blue Lakes trails and habitat. The damage from overuse and abuse may require little to no use to restore the land and reduce the undesirable human imprints. ROCC volunteers suggested closing the Blue Lakes for two to three years to heal. Consider limiting Blue Lakes users to travelling only on existing official trails may be necessary.
- Limiting the number of day users and campers to restore and preserve wilderness characteristics with day use and overnight quotas and implementing a fee permit system. For example, Sierra National Forest has a Wilderness permit system, for the stated purpose of “*A daily entry quota system is in effect for all wilderness areas to protect the natural resources and to preserve the quality of the wilderness. The land can only support a certain number of visitors. When excessive use occurs all at one time, the opportunity for solitude decreases, vegetation gets damaged, erosion is accelerated, and the risk of water pollution increases.*”¹² Sierra National Forest’s quota system preserves 40 percent of Wilderness Permits for walk-ins and 60 percent for advance reservations.
- Incorporate a Leave No Trace Ethics and Etiquette informational brochure and signature page for users to sign when picking up backcountry/wilderness permits, similar to Sequoia National Forest.¹³
- Some citizens have advocated for Day Use Only for Blue Lakes, but there is documented negative impacts from the hundreds of daily day users.

¹¹ <https://ouraycountyco.gov/DocumentCenter/View/11965/D-----Six-Basins-Project-Variance---Section-243A> ; and photo of constructed restroom at: <https://www.facebook.com/SixBasinsProjectInc/about/> ; accessed October 13, 2021.


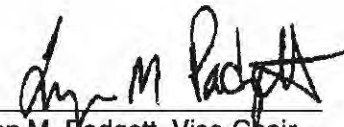
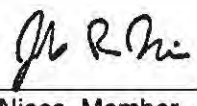
¹² https://www.fs.usda.gov/detail/sierra/passes-permits/?cid=fsbdev7_018115 ; accessed October 13, 2021.

¹³ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev3_058507.pdf ; accessed October 13, 2021.

- Ouray County and Ridgway value and protect dark skies, and any quota system should still allow for visitors to view and photograph the incredible night skies at Blue Lakes. This means banning overnight parking/vehicle camping at trail heads but allowing unoccupied vehicles to remain for permitted backpackers or photographers.
- Addressing sanitation with either a pit toilet convenient to hikers and designated camp sites and/or a requirement to pack out all human waste.
- Clearly designating a small number of dispersed campsites at one of the lakes while prohibiting camping at others.
- "Vehicle corrals" (marking parking lot limits with boulders or worm-fencing) at appropriate parking areas where traffic can safely turnaround and pass in opposite directions.
- Work to remove Blue Lakes as a must-see attraction from popular tourist web sites. For example, a Google search for "blue lakes hike top attraction things to do ouray telluride" turns up over 500,000 results. However, the first 30 results are mostly local or regional websites, including Telluride and Ouray visitor/chamber sites, trying to drive web traffic to themselves¹⁴. Explore a campaign to request omitting Blue Lakes Trail from these lists and sites. Explore public outreach, including on the GMUG web pages, All Trails, and Trip Advisor, to explain that due to overuse and abuse, any new protective policies that are in place and message that those seeking solitude and wilderness experiences should avoid Blue Lakes.
- Evaluate reducing the number of people and pack animals allowed in a group, currently 15 people and 25 pack animals. Public comment suggests that 15 people per group is too many. Perhaps 8 to 10 people (approximately 2 families) per group should be the max.
- Identify and strengthen partnerships and funding to sustainably fund education/outreach, an embedded alpine ranger, and enforcement of Leave No Trace and protective regulations.
- Rehabilitate and close widened areas and trail braids. Protect water quality and riparian areas by providing a primitive foot bridge over stream crossings. Evaluate where additional trail markers or signage can prevent hikers from inadvertently going off trail.

We appreciate the opportunity to provide comments on the Blue Lakes area, which is treasured by locals and visitors. We appreciate the GMUG Ouray Ranger District's willingness to address the overuse and abuse issues at Blue Lakes and **we are interested in Ouray County participating in the EIS process as a cooperating agency.**

Respectfully,

Ben Tisdel, Chair Lynn M. Padgett, Vice-Chair Jake Niece, Member

CC: John Whitney, Western Slope Regional Director, U.S. Senator Michael F. Bennet; John_Whitney@bennet.senate.gov
 Helen Katich, Regional Representative, Southwest, U.S. Senator Hickenlooper; helen_katich@hickenlooper.senate.gov

¹⁴ Examples of Blue Lakes Trail or hike being advertised/listed as a top attraction activity: <https://www.youtube.com/watch?v=Bb79EyXGKNw>; <https://www.outherecolorado.com/things-to-do/ouray/>; <https://www.visitheusa.com/destination/telluride>; <https://familydestinationsguide.com/best-things-to-do-in-telluride-co/>; https://www.triphobo.com/places/ouray-united-states/things-to-do?utm_source=5412&utm_medium=123&utm_campaign=dsa-things-to-do-usa-d-76543&qclid=Cj0KCQIwgp-LBhDQARisAO0a6aKU7eTaPJNSOW9l8Acl_2l8z-B4ktbGVsNAM2Dlzl9qRQmnM3ePz0aAg3_FALw_wcB; https://www.alltelluride.com/ouray_colorado/activities.php; <https://www.foxintheforest.net/things-to-do-in-ouray-colorado/>; <https://www.uncovercolorado.com/things-to-do-in-telluride-co/>; <https://weariwandered.com/fun-things-to-do-in-ouray-colorado-in-the-summer/>; <https://www.coloradohikesandhops.com/blog/million-dollar-highway-and-ouray-hikes>; <https://www.radfamilytravel.com/home/ouray-colorado-things-to-do-with-kids-teenagers>; <https://www.pinterest.com/pin/539446861612976074/>; <https://vacationidea.com/colorado/best-things-to-do-in-ouray.html>; <https://twooramingsouls.com/8-fun-things-to-do-in-ouray-co/>; http://www.hikingwalking.com/index.php/destinations/co/sw/ouray/blue_lakes/blue_lakes_detail; <https://www.telluride.com/play/activities/blue-lakes/>; <http://www.rockymountainhikingtrails.com/blue-lakes.htm>; https://www.tripadvisor.com/Attraction_Review-g33667-d102683-Reviews-Blue_Lakes_Trail-Telluride_Colorado.html; accessed October 14, 2021. <https://www.alltrails.com/trail/us/colorado/lower-middle-and-upper-blue-lakes> <https://www.alltrails.com/trail/us/colorado/blue-lakes-pass-via-yankee-boy-basin--2>

2. Appendix B: Recent Ouray County Traffic Counts

Year	Site	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	ADT	ADTx365	Days with	Year start	Year end
2019	CR 1 North End (near pumphous	25,471	24,597	26,768	29,008	30,128	30,265	33,243	32,712	32,829	33,399	25,170	25,601	956,688	349,191	365	2019-01-0	2020-01-01
2020	CR 1 North End (near pumphous	26,913	25,246	27,230	27,375	36,197	47,223	34,456	32,394	30,924	35,272	31,265	27,335	1,045,942	382,815	360	2020-01-0	2021-01-01
2021	CR 1 North End (near pumphous	25,547	24,700	36,582	42,735	36,110	37,368	36,467	36,283					1,133,543	413,743	234	2021-01-0	2022-01-01
2019	CR 1 South end	28,697	25,610	36,774	37,911	37,490	41,021	43,319	40,396	38,537	41,742	27,705	29,906	1,175,638	429,108	365	2019-01-0	2020-01-01
2020	CR 1 South end	28,774	26,515	33,817	30,389	46,525	48,178	44,552	44,002	40,822	40,219	37,363	31,327	1,234,536	451,840	358	2020-01-0	2021-01-01
2021	CR 1 South end	29,632	26,985	39,172	47,718	50,875	44,428	46,411	46,268					1,360,192	496,470	234	2021-01-0	2022-01-01
2019	CR 10 West End	4,562	4,292	4,658	5,097	7,505	9,914	12,528	11,086	11,845	12,464	6,177	4,440	259,090	94,568	365	2019-01-0	2020-01-01
2020	CR 10 West End	5,115	4,798	5,434	5,723	10,263	12,108	13,210	11,938	13,049	11,279	5,873	4,881	283,254	103,671	366	2020-01-0	2021-01-01
2021	CR 10 West End	4,147	4,066	5,876	5,245	8,407	9,924	11,832	10,686					245,021	89,433	235	2021-01-0	2022-01-01
2019	CR 12 west end	9,009	19,931	12,756	18,397	23,497	16,720	12,872	12,512	22,565	26,112	15,489	5,188	534,378	195,048	365	2019-01-0	2020-01-01
2020	CR 12 west end	6,376	11,940	19,191	11,414	18,407	32,467	16,033	11,791	8,708	15,591	17,015	6,928	480,495	175,861	366	2020-01-0	2021-01-01
2021	CR 12 west end	9,424	9,143	14,106	34,723	26,033	12,975	20,363	15,825					589,970	215,339	234	2021-01-0	2022-01-01
2019	CR 14 Panoramic Heights	4,665	4,660	4,658	5,463	7,452	10,763	12,657	10,304	8,583	6,592	4,660	4,672	233,230	85,129	365	2019-01-0	2020-01-01
2020	CR 14 Panoramic Heights	4,985	4,186	3,962	3,583	6,341	9,805	13,044	11,361	9,451	7,628	5,146	4,253	234,155	85,701	343	2020-01-0	2021-01-01
2021	CR 14 Panoramic Heights	3,962	3,219	4,018	4,734	7,994	11,463	12,844	11,338					241,521	88,155	234	2021-01-0	2022-01-01
2019	CR 17 South End/Black Lake	1,751	1,742	1,365	1,464	2,252	1,888	2,835	2,677	4,037	2,480	4,532	1,720	78,748	28,743	365	2019-01-0	2020-01-01
2020	CR 17 South End/Black Lake	1,503	1,271	1,526	1,958	2,958	3,673	3,776	3,951	3,532	3,151	1,803	2,039	85,085	31,141	366	2020-01-0	2021-01-01
2021	CR 17 South End/Black Lake	2,082	1,679	2,101	3,942	3,779	4,236	4,660	3,848					107,974	39,411	234	2021-01-0	2022-01-01
2019	CR 22 S of 22 A	6,749	19,422	154,290	382,930	225,241	342,470	397,686	449,248	472,425	304,394	9,837	2,791	7,622,113	2,782,071	363	2019-01-0	2020-01-01
2020	CR 22 S of 22 A	2,615	11,245	4,501	138,936	399,902	468,680	334,123	281,703	187,882	332,018	135,991	18,480	6,422,626	2,350,681	358	2020-01-0	2021-01-01
2021	CR 22 S of 22 A	29,611	114,584	217,343	324,088	346,931	355,958	287,610	289,613					8,018,349	2,926,697	232	2021-01-0	2022-01-01
2019	CR 23 KOA bridge	18,775	16,168	19,015	20,764	29,477	43,427	60,799	51,926	40,262	25,602	19,762	19,651	1,001,721	365,628	365	2019-01-0	2020-01-01
2020	CR 23 KOA bridge	18,919	17,199	16,096	16,042	29,193	45,811	62,996	59,530	52,755	36,124	20,230	22,248	1,119,064	409,578	342	2020-01-0	2021-01-01
2021	CR 23 KOA bridge	20,887	18,750	21,953	25,348	35,929	57,140	67,118	59,760					1,242,543	453,528	234	2021-01-0	2022-01-01
2019	CR 23 North end	9,241	7,384	8,399	9,863	11,827	11,311	11,986	12,336	11,429	11,751	9,061	8,420	337,008	123,008	365	2019-01-0	2020-01-01
2020	CR 23 North end	8,705	7,403	8,457	9,903	13,207	14,144	13,453	13,132	12,180	12,139	10,301	12,349	369,872	135,373	366	2020-01-0	2021-01-01
2021	CR 23 North end	15,030	14,167	13,667	13,838	13,986	13,490	13,043	12,581					453,207	165,421	232	2021-01-0	2022-01-01
2019	CR 24 Dallas Bridge	14,709	13,078	16,001	15,083	17,730	19,198	18,663	21,422	19,338	19,364	14,924	13,495	556,178	203,005	365	2019-01-0	2020-01-01
2020	CR 24 Dallas Bridge	13,296	12,973	12,733	12,818	17,125	18,176	21,043	20,738	19,318	17,967	15,345	14,864	536,601	196,396	366	2020-01-0	2021-01-01
2021	CR 24 Dallas Bridge	14,612	12,317	15,470	16,775	20,968	18,701	20,614	18,417					566,761	206,868	234	2021-01-0	2022-01-01
2019	CR 24 south end	969	1,398	990	1,225	1,507	1,310	1,534	1,269	1,982	1,901	1,344	1,022	45,071	16,451	365	2019-01-0	2020-01-01
2020	CR 24 south end	882	740	898	1,448	1,552	2,564	1,545	1,498	1,924	1,892	1,764	1,270	49,117	17,977	366	2020-01-0	2021-01-01
2021	CR 24 south end	1,084	997	1,324	1,426	2,073	1,955	1,817	1,495					50,179	18,316	234	2021-01-0	2022-01-01
2019	CR 24 W of CR 5	7,228	6,646	8,799	8,303	9,445	10,121	9,232	10,891	10,745	10,763	7,836	6,762	292,523	106,771	365	2019-01-0	2020-01-01
2020	CR 24 W of CR 5	6,991	6,683	7,363	7,282	9,973	10,134	11,704	11,511	11,682	10,142	8,035	7,874	297,470	108,874	366	2020-01-0	2021-01-01
2021	CR 24 W of CR 5	7,496	6,428	8,270	9,427	11,331	9,546	9,893	9,924					299,808	108,700	234	2021-01-0	2022-01-01
2019	CR 24 Weaver Bridge	10,965	19,676	19,039	19,568	13,138	13,846	12,686	11,848	13,498	14,951	8,452	10,004	459,373	167,671	365	2019-01-0	2020-01-01
2020	CR 24 Weaver Bridge	11,303	10,465	14,602	13,493	18,604	14,678	14,510	14,582	13,402	17,417	18,738	14,248	480,989	176,042	366	2020-01-0	2021-01-01
2021	CR 24 Weaver Bridge	11,059	21,338	19,971	27,173	16,704	15,724	16,499	14,178					591,209	215,791	234	2021-01-0	2022-01-01
2019	CR 24A McCreede Bridge	25,282	22,279	25,293	24,537	28,281	32,229	37,080	36,674	33,323	31,908	23,600	25,317	947,405	345,803	365	2019-01-0	2020-01-01
2020	CR 24A McCreede Bridge	24,988	23,444	22,088	19,206	26,495	32,159	35,289	33,482	33,206	31,267	24,777	25,558	906,992	331,959	366	2020-01-0	2021-01-01
2021	CR 24A McCreede Bridge	25,054	22,906	28,812	27,731	32,225	35,006	37,611	36,734					1,007,137	367,605	234	2021-01-0	2022-01-01
		J	F	M	A	M	J	J	A S	O	N	D						
2019	CR 361 Ice Park bridge	9,406	8,022	8,535	6,353	8,833	19,151	32,736	28,695	22,624	11,529	4,969	8,166	486,574	177,600	331	2019-01-0	2020-01-01
2020	CR 361 Ice Park bridge	10,273	8,753	6,687	5,896	16,074	27,173	45,848	41,669	34,213	22,380	8,478	12,963	656,850	240,407	366	2020-01-0	2021-01-01
2021	CR 361 Ice Park bridge	12,926	11,836	11,074	11,107	18,888	31,150	48,126	40,735					747,748	272,928	234	2021-01-0	2022-01-01
2019	CR 361 Weehawken Bridge	2,577	3,631	2,770	2,037	4,594	11,825	25,073	21,923	16,013	7,351	1,975	2,398	279,910	102,167	365	2019-01-0	2020-01-01
2020	CR 361 Weehawken Bridge	3,063	3,407	2,748	3,007	7,758	17,812	33,700	30,183	25,378	14,046	4,313	6,229	414,328	151,644	366	2020-01-0	2021-01-01
2021	CR 361 Weehawken Bridge	5,766	4,822	5,221	6,450	11,194	20,257	33,099	29,153					462,697	168,884	234	2021-01-0	2022-01-01
2019	CR 5 N of Ridgway Town limits	8,323	12,025	101,578	130,322	64,320	63,422	46,537	27,342	67,212	72,395	21,101	17,662	1,732,162	632,239	365	2019-01-0	2020-01-01
2020	CR 5 N of Ridgway Town limits	7,802	17,643	109,020	97,937	118,046	115,406	72,863	73,130	26,138	87,973	53,542	7,961	2,142,217	784,051	364	2020-01-0	2021-01-01
2021	CR 5 N of Ridgway Town limits	7,013	28,384	119,546	202,474	122,345	30,562	34,261	33,329					2,416,483	882,016	234	2021-01-0	2022-01-01
2019	CR 5 North of CR 5A	11,527	21,807	10,330	21,428	13,907	15,030	10,292	9,057	13,755	32,622	12,764	10,024	500,118	182,543	365	2019-01-0	2020-01-01
2020	CR 5 North of CR 5A	12,115	9,039	10,173	16,840	19,009	18,630	11,204	13,024	11,152	21,751	11,983	9,589	449,478	16			

- 3. Appendix C: Ouray County letter to GMUG Ouray Ranger District regarding allowing USFS lands to participate in a Time Critical Removal Action in Governor Basin dated November 23, 2021.**



BEN TISDEL
LYNN PADGETT
JAKE NIECE

BOARD OF COUNTY COMMISSIONERS

541 4th Street • P.O. Box C • Ouray, Colorado 81427 • 970-325-7320 • FAX: 970-325-0452

November 23, 2021

Chad Stewart, USDA USFS GMUG Forest Supervisor
2250 South Main St
Delta, CO 81416

Dana Gardunio, District Ranger, GMUG
2505 S. Townsend Ave.
Montrose, CO 81401

Transmitted Via email: chadstewart@fs.fed.us; dana.gardunio@usda.gov

RE: Governor Basin Time Critical Removal Action

Dear Chad and Dana,

In October and during a few more recent meetings, the Ouray County Board of County Commissioners (BOCC), received updates from Ouray Silver Mines, Inc. (OSMI) and Uncompahgre Watershed Partnership (UWP) on the proposed **Governor Basin Time Critical Removal Action project** within the historic Sneffels Mining District of Ouray County. This project would reclaim abandoned mine lands and acidic waste dumps and tailings related to the Terrible and Virginus Mines which are mobilizing arsenic, cadmium, lead, and zinc into Governor Creek, a tributary of Sneffels Creek and Uncompahgre River¹. The contaminants have been measured in leachate and waste rock or tailings at levels that cause water quality impairment and negative impacts to human health or ecological receptors.² This collaborative project will restore alpine, riparian and aquatic habitat, and improve water quality in Governor, Sneffels and Canyon creeks. **The project has the full support of the Ouray County Board of County Commissioners.** On October 19, 2021 the BOCC adopted Resolution 2021-037 in support of this project (Attachment A). We look forward to the continued collaboration of local stakeholders, including OSMI, Trout Unlimited (TU), Uncompahgre Watershed Partnership (UWP), U.S. Environmental Protection Agency (EPA), the U.S. Forest Service (USFS) Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) and Ouray Ranger District, to complete this worthwhile project. We understand the USFS is currently finalizing the work plan for the project. If the county can provide any assistance, please let us know. We look forward to additional updates on construction progress in 2022.

¹ Uncompahgre Watershed Partnership, August 2018, "Assessment Report: Governor Basin: Terrible, Virginus, and Humboldt Mine Sites Near Ouray, Colorado."

² Uncompahgre Watershed Partnership, August 2018, "Assessment Report: Governor Basin: Terrible, Virginus, and Humboldt Mine Sites Near Ouray, Colorado." Pages 15-16, 28-31, and 34.

We are also writing to encourage the GMUG and Ouray Ranger District to allow or delegate the proposed Tasks 4 and 5 or equivalent remediation/removal work on USFS land to the EPA so it can be performed contemporaneously with the other Tasks by TU as part of a Time Critical Removal Action co-funded by the Natural Resources Damage (NRD) Fund. It is important to include the work on the 1.51 acres of USFS Lands, which includes contaminated waste rock and tailings, at the same time as the adjacent OSMI lands during summer 2022. It will be cost-efficient to perform all of the Terrible and Virginius removal work in one effort and it also will achieve necessary improvements in water quality and watershed health as quickly as possible. The total footprint of the proposed remedial/removal action is estimated at 10.47 acres, with 8.96 acres on Ouray Silver Mines property and 1.51 acres on USFS lands. If the USFS lands are omitted from the proposed project, the gains in water quality and watershed health will be diminished (see maps below).

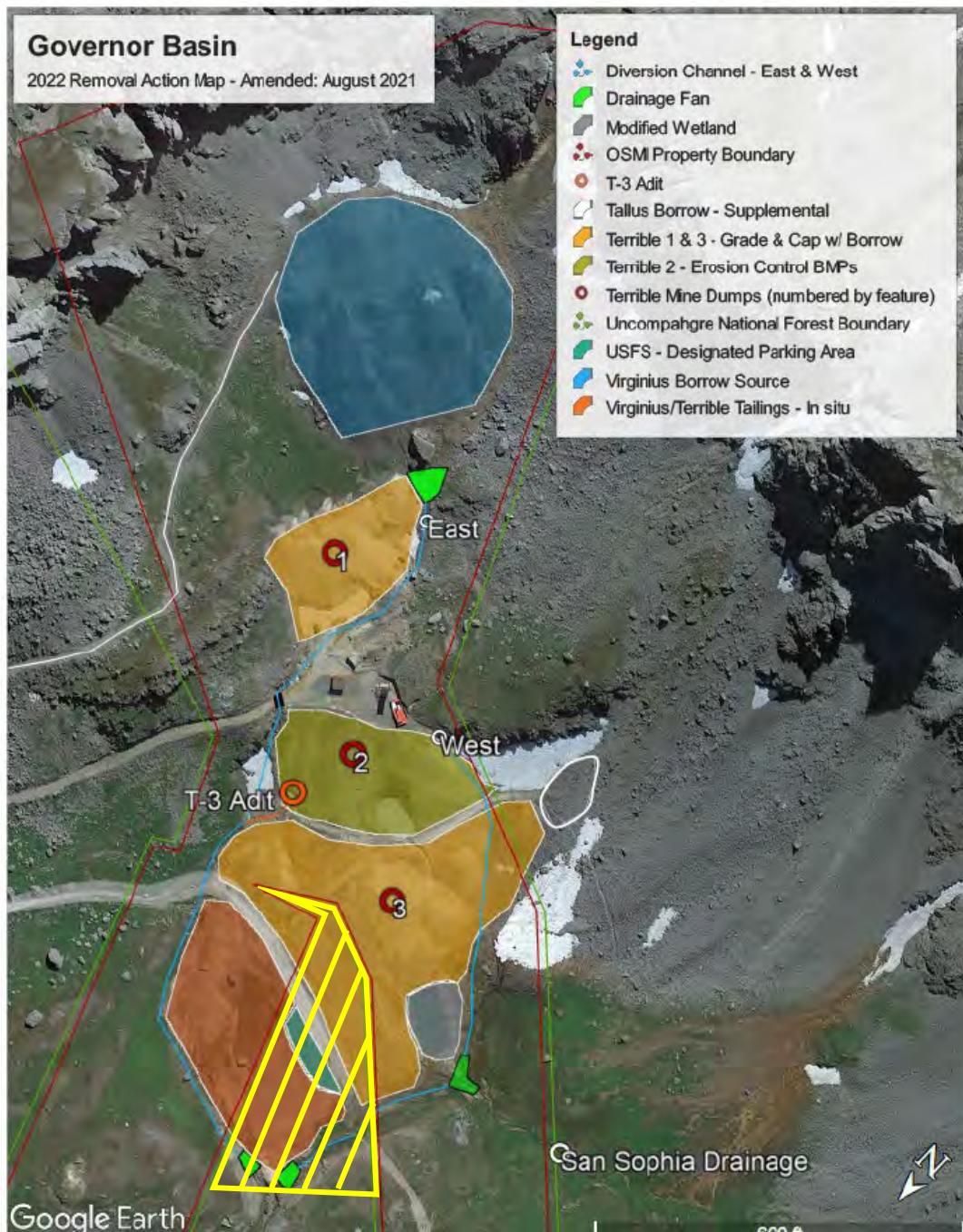
The Virginius and Terrible Mines sit at the head of Governor Basin (Site), the headwaters of Sneffels Creek, and later Canyon Creek, which is a tributary to the Uncompahgre River. The project area is situated 8 miles northwest of the City of Ouray, in Ouray County, Colorado. The project has a draft work plan and TU is wrapping up an RFP process seeking proposals from qualified contractors to perform the reclamation work during the short alpine summer window typical for elevations above 12,000 feet, in 2022.

This project is characterized as a cap and cover, focused on three waste dumps and redirecting flows from the draining adit at the Terrible Mine, with the borrow source originating from the Virginius Mine. In addition to the cap and cover, drainage controls and a modified wetland will address water on-site, and a small portion of the Site will receive in-situ soil amendments and revegetation.

Sincerely,



Ben Tisdell, Chair
Ouray County Board of County Commissioners



2022 Removal Action Map from the TU September 2021 RFP³, showing the USFS Boundary. Modified to provide bright yellow hatching showing the USFS's 1.5 acres.

³ https://www.uncompahgrewatershed.org/wp-content/uploads/2021/10/TU_Governor-Basin-Removal-Action_RFP-Revised.pdf, Page 13.

Figure 4. Detailed map of the Virginius and Terrible Mine sites. The Virginius waste rock is outlined in blue. The Terrible #1 mine dump is outlined in white, #2 mine dump in yellow, and #3 mine dump in red. Mixed tailings from the Virginius and Terrible veins are outlined in orange. The polygon boundaries are approximate. Imagery courtesy of Google Earth.



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Showing the proposed project area, mine dumps and tailings where runoff flows into Governor Creek downslope to the north. Source: UWP Assessment Report, Governor Basin.⁶

⁴ Uncompahgre Watershed Partnership, August 2018, "Assessment Report: Governor Basin: Terrible, Virginius, and Humboldt Mine Sites Near Ouray, Colorado." Page 19.

⁵ https://www.uncompahgrewatershed.org/wp-content/uploads/2021/10/TU_Governor-Basin-Removal-Action_RFP-Revised.pdf

RESOLUTION No. 2021-037

230465



Page 1 of 2

Michelle Nauer, Clerk & Recorder

Ouray County, CO

10-20-2021 11:26 AM Recording Fee \$0.00

A RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF OURAY COUNTY, COLORADO APPROVING ENVIRONMENTAL USE RESTRICTIONS 1) PREVENTING FUTURE LAND DISTURBANCES, AND 2) PROVIDING FOR PUBLIC ACCESS TO THE GOVERNOR BASIN RESTORATION PROJECT ON LANDS OWNED BY OURAY SILVER MINES

WHEREAS, the Uncompahgre Watershed Partnership (UWP), with the support of Ouray Silver Mines, Incorporated (OSMI) and Trout Unlimited (TU), secured funding from the Colorado Natural Resource Damages (NRD) Program to complete a restoration project in Governor Basin, as outlined in "History and Rationale to Support Ouray County Resolution for Governor Basin Restoration Project" attached hereto as "Exhibit A"; and

WHEREAS, the NRD Program required recorded environmental use restrictions preventing future surface-based mining on the property and any other land disturbances that could interfere with the restoration project located on lands owned by OSMI; and

WHEREAS, the NRD Program required OSMI to provide for public access and use of all properties in the project area on lands owned by OSMI; and

WHEREAS, the Governor Basin Restoration Project, which includes waste from the Virginius and Terrible Mines, is located at 37.96923, -107.77513 in Governor Basin, approximately 10 miles southwest of Ouray, in Ouray County Colorado.

NOW THEREFORE, BE IT RESOLVED that the Board of County Commissioners finds the requirements of the NRD program appropriate and consistent with the goals of the Governor Basin Restoration Project. Therefore, the Board of County Commissioners of Ouray County hereby adopt the following:

- 1) Surface disturbance that could interfere with the Governor Basin Restoration Project on lands owned by Ouray Silver Mines Incorporated is prohibited.
- 2) Public access and use of all properties in the Governor Basin Restoration Project on lands owned by Ouray Silver Mines Incorporated shall be permitted.

Adopted this 19TH day of OCTOBER, 2021.

Voting for: (COMMISSIONERS TISEL, PADGETT + NIECE)
Voting against: NONE

Attest:

BOARD OF COUNTY COMMISSIONERS OF OURAY COUNTY, COLORADO

Ben Tisdell, Chair

Lynn M. Padgett, Vice-Chair

Jake Niece, Commissioner Member

Michelle Nauer, Clerk and Recorder
By: Hannah Hollenbeck, Deputy Clerk of the Board

"Exhibit A"

History and Rationale to Support Ouray County Resolution for Governor Basin Restoration Project

Prepared by Ashley Bembenek, Uncompahgre Watershed Partnership, on September 24, 2021.

In April 2018, the Colorado Department of Public Health and Environment provided a letter to Ouray County stakeholders. The letter listed projects completed in Ouray and San Miguel counties using Idarado Natural Resource Damages ("NRD") funds¹, identified the remaining balance of NRD funds, and encouraged Ouray County stakeholders to lead a public process to recommend projects to use the remaining NRD funds.

In the months that followed, Ouray County facilitated the public process to recommend projects to the NRD program. Two projects were identified through the public process. The Trust for Land Restoration will use NRD funds to acquire and conserve lands on and near the Silver Mountain Mine. The Uncompahgre Watershed Partnership, along with Ouray Silver Mines Incorporated ("OSMI") and Trout Unlimited ("TU"), will complete a restoration project to reduce environmental contamination attributed to the Revenue and Terrible mines in Governor Basin ("Project" or "Governor Basin Restoration Project").

In June 2019, the NRD trustees² adopted a resolution approving the use of Idarado NRD funds for the Project. The NRD trustees' resolution for the Project includes seven conditions that must be met to prior to the use of NRD funds. Ouray County, NRD staff, and local project partners have decided that a county resolution is the most efficient way to accomplish two of the conditions.

These conditions are 1) to prevent surface disturbance in the restored areas and 2) allow for public access and use on lands owned by OSMI. The attached resolution was drafted to satisfy the requirements of the NRD Trustees. The resolution was reviewed and is supported by UWP, OSMI, TU, and NRD staff. If Ouray County adopts the resolution, UWP will be granted the NRD funds for the Project. Project construction is planned for the summer of 2022.

Governor Basin is located roughly 10 miles southwest of Ouray in the headwaters of the Canyon Creek Watershed. Governor Basin is home to the Revenue and Terrible mines; both are historic abandoned mines. Waste rock and tailings from these mines create human-health and environmental risks in the basin and substantial water quality impacts that extend downstream. The Governor Basin Restoration Project will reduce these impacts by consolidating and treating mine waste and tailings, redirecting surface water flows to prevent contamination, and use designated parking areas and fences to prevent recreationists from contacting contaminated materials. The Project will treat approximately 10.5 acres.

¹ In 1983, the State of Colorado filed suit against Idarado Mining Company for natural resource damages under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). In 1993, the State and Idarado entered into a consent decree outlining the remedial action plan for the Idarado site. As part of the consent decree, the state received approximately \$1.1 million dollars for NRD restoration activities in Ouray and San Miguel counties.

² The State Attorney General and the Directors of the Departments of Public Health and Environment and Natural Resources serve as the NRD Trustees.

4. Appendix D: Ouray County DRLMP public comment deadline extension request letter and documentation dated October 26, 2021.



BEN TISDEL
LYNN M. PADGETT
JAKE NIECE

BOARD OF COUNTY COMMISSIONERS

P.O. Box C • Ouray, Colorado 81427 • 970-325-7320 • FAX: 970-325-0452

October 26, 2021

Attn: Chad Stewart, GMUG Forest Supervisor; Samantha Staley, Forest Planner; Jonathan Tucker, Asst. Forest Planner;
GMUG Forest Plan Revision Team

2250 South Main St

Delta, CO 81416

Via email to: chadstewart@fs.fed.us; samantha.j.staley@usda.gov; jonathan.tucker@usda.gov

Dear Supervisor Stewart,

On behalf of the Board of County Commissioners of Ouray County, thank you for the opportunity to provide comments regarding the GMUG Forest Plan Revision. The Board is respectfully requesting the public comment period on the Draft Land Use Plan and Draft Environmental Impact Statement (EIS) **be extended by 60 days to allow more time for the Cooperating Agencies and our public to review the documents and GIS files in the context of the revised assessments and the 2012 Planning Rule.**

Counties, as Cooperating Agencies, have a wide lens and must examine all portions of the plan, not just a few subsections or special interest topics. Ouray County is nearly 50 percent federal public lands and management of public lands has ramifications for our local economy, quality of life and county operations such as Road and Bridge, Search and Rescue, EMS, Justice and Public Safety, Environmental Health, and more.

You are aware that there is significant need and willingness to learn about the how Recreational Opportunity Spectrum (ROS) and Scenic Integrity Objectives change between alternatives. We are grateful that additional webinars are being scheduled in mid-late October, but they are occurring just a few weeks prior to the comment deadline. **If the goal is to identify potential errors or obtain quality comments from the gateway communities and forest users most familiar with the forest, more time is needed.**

The full draft EIS document and GIS files needed to understand the context and details of the Draft Plan and alternatives were not available to the Cooperating Agencies until well after the initial Draft Plan was released to the public, and not at all during the Cooperating Agency review period. The extra time requested will allow for the provision of helpful, informed and targeted input. We appreciate the helpful webinars and virtual open houses held since the release of the public documents, and story maps, but the bulk of this information was not available to the Cooperating Agencies or our public until 45 to 60 days into the 90-day public comment period.

It is unfortunate that Cooperating Agencies, were not afforded 60 days prior to August 13, 2021, to preview the Draft EIS or GIS files in companion with the Draft Plan since we do review all parts of the Draft Plan, Draft EIS, and supporting materials in depth. The GMUG plan revision is one of the first to use the 2012 Planning Rule, providing an additional need for Cooperating Agency and public education neither the Cooperating Agencies nor the public were allowed to obtain pertinent GIS files which aid our review. **The goal for all parties should be to have relevant and informed comments that will improve the plan and discover any errors, omissions, or unintended consequences.**

Thank you for your consideration of our request of a **60-day public and Cooperating Agency comment extension for 60 days after the original November 12, 2021 deadline.** The extension is necessary to provide you with informed and helpful comments on the topics and alternatives covered in the Draft Plan.

Respectfully,

Ben Tidel, Chair

Lynn M. Padgett, Vice-Chair

Jake Niece, Member

Lynn Padgett

From: Tucker, Jonathan -FS <jonathan.tucker@usda.gov>
Sent: Tuesday, August 10, 2021 8:34 AM
To: Lynn Padgett
Cc: Staley, Samantha -FS
Subject: RE: Upcoming webinars

Hi Lynn,

Thanks again for the call yesterday.

I can request the SIO files but it's going to be a while at least until we can get that. Our GIS expert is having some computer issues and is a bit backed up with several other requests we have.

As far as the open house for Ouray county, I can certainly run that idea by leadership and get their take. I think I can say for sure that I could probably attend and help out but I don't want to speak for others without asking first.

I appreciate the idea of a safe in person meeting.

- Tucker



Jonathan Tucker
Asst Forest Planner

Forest Service
Grand Mesa
Uncompaghre and
Gunnison National
Forests

p: 970-573-1876

Jonathan.Tucker@usda.gov

2250 South Main St

Delta, CO 81416

www.fs.fed.us



Caring for the land and
servicing people

From: Lynn Padgett <lpadgett@ouraycountyco.gov>
Sent: Tuesday, August 10, 2021 8:27 AM
To: Tucker, Jonathan -FS <jonathan.tucker@usda.gov>
Subject: RE: Upcoming webinars

Dear Jonathan,

Thanks for this clear email. Just a quick question on the cooperating agency BOX files – is there a chance the USFS could add the scenic integrity GIS files? Is it true that the only new map content is the Wilderness areas map, but all other maps and GIS are the same?

I can explore Ouray County hosting a mandatory mask in-person open house at our 4H event center. We could also limit the number of participants to the number of chairs set 6 feet apart for your powerpoint. Should I pursue this with our facilities manager and our BOCC? I think it would be so helpful to have an in-person opportunity.

Thanks,
Lynn



Lynn Padgett

Ouray County Commissioner, District 1
lpadgett@ouraycountyco.gov
cell-970.258.0836

From: Tucker, Jonathan -FS [<mailto:jonathan.tucker@usda.gov>]
Sent: Monday, August 9, 2021 4:46 PM
To: amber.swasey@mesacounty.us; bocc@gunnisoncounty.org; bocc@sanjuancountycolorado.us; bocc@sanmiguelcountyco.gov; btisdell@ouraycountyco.gov; Connie <chunt@ouraycountyco.gov>; cpagano@gunnisoncounty.org; dsupes@deltacounty.com; eksmith@gunnisoncounty.org; fjarman@garfield-county.com; fredjarman@garfield-county.com; hhollenbeck@ouraycountyco.gov; hilaryc@sanmiguelcountyco.gov; Jami Scroggins <administrator@hinsdalecountycolorado.us>; jhouck@gunnisoncounty.org; jmusser@montrosecounty.net; jniece@ouraycountyco.gov; Jon <jwaschbusch@montrosecounty.net>; Josh <Jost@gunnisoncounty.org>; kcaddy@montrosecounty.net; krish@sanmiguelcountyco.gov; kristineborchers@yahoo.com; lancew@sanmiguelcountyco.gov; Linda Frasier <linda.frasier@mesacounty.us>; lpadgett@ouraycountyco.gov; lynnp@sanmiguelcountyco.gov; mcadmin@mesacounty.us; mikeb@sanmiguelcountyco.gov; mlane@deltacounty.com; mspearman@saguachecounty-co.gov; rmason@gunnisoncounty.org; Robbie <rlevalley@deltacounty.com>; rrash@montrosecounty.net; scott.mcinnis@mesacounty.us; shansen@montrosecounty.net; starri@sanmiguelcountyco.gov; stephanie.reecy@mesacounty.us; tlovato@saguachecounty-co.gov; Wendy <wmaez@saguachecounty-co.gov>
Cc: Staley, Samantha -FS <samantha.j.staley@usda.gov>; Phillips, Kim- FS <Kimberlee.Phillips@usda.gov>; Randall-Parker, Tamera- FS <tamera.randall-parker@usda.gov>; Stewart, Chad -FS <chad.stewart@usda.gov>; Edwards, Anthony -FS <anthony.edwards@usda.gov>; Mccombs, Matthew -FS <matthew.mccombs@usda.gov>; Eno, Megan -FS <megan.eno@usda.gov>; Gardunio, Dana - FS <Dana.Gardunio@usda.gov>; Edwards, William -FS <william.edwards@usda.gov>; Broyles, Levi -FS <levi.broyles@usda.gov>; jlavorini@nationalforests.org; eolsen@nationalforests.org
Subject: Upcoming webinars

Hello,

The GMUG is excited to announce that it has finalized a publication date (August 13) of the long-awaited draft forest plan and draft environmental impact statement.

Documents posted at 7:10 am on 9/8/2021 (4th week of public comment period). No scenic integrity GIS or Interactive StoryMaps referenced as being part of the draft Plan Maps on Draft plan pg 180.

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Recreation
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Draft Revised Forest Plan and DEIS

Welcome to the newest addition to our planning website! [Click here to go back to our main forest planning page.](#)

On August 13, 2021, we published the Draft Forest Plan and Draft Environmental Impact. This began a 90-day comment period where you can voice your support and concerns with the plan and help inform the final product. Comments are due by November 12, 2021.

The GMUG National Forests with the National Forest Foundation will be hosting a series of virtual webinars and open houses to provide an orientation to the draft documents and to host community conversations.

Upcoming dates, links and past recordings of the events are located here.

Use the links below to navigate to the document or map you're interested in viewing.

GMUG Draft Land Management Plan
GMUG Plan Revision Draft EIS Volume I
GMUG Plan Revision Draft EIS Volume II
Quick Guide to the Draft Plan
Forest Plan Revision Timber FAQs
Forest Plan Revision Timber WUI FAQs

*Geographic Area maps provide a zoomed-in view of smaller, discrete areas on the forest: the Uncompahgre Plateau, the Grand Mesa, etc.

Management area maps and GIS data

Alternative A Forestwide
Alternative A Geographic Area
Alternative B Forestwide
Alternative B Geographic Area
Alternative C Forestwide
Alternative C Geographic Area
Alternative D Forestwide
Alternative D Geographic Area
Wilderness Management Area

******Downloadable Management Area GIS data******

Scenic Integrity Objective (SIO) maps

Alternative A Forestwide
Alternative B Forestwide
Alternative C Forestwide
Alternative D Forestwide

Summer Recreation Opportunity Spectrum maps and GIS data

Alternative A Forestwide
Alternative A Geographic Area
Alternative B Forestwide
Alternative B Geographic Area
Alternative C Forestwide
Alternative C Geographic Area
Alternative D Forestwide
Alternative D Geographic Area

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Please contact us:

sm.fs.gmugplanning@usda.gov

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Winter Recreation Opportunity Spectrum maps and GIS data

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- [Alternative A Geographic Area](#)**
- [Alternative B Forestwide](#)**
- [Alternative B Geographic Area](#)**
- [Alternative C Forestwide](#)**
- [Alternative C Geographic Area](#)**
- [Alternative D Forestwide](#)**
- [Alternative D Geographic Area](#)**

[Downloadable Summer and Winter ROS GIS data](#)

Timber Suitability maps and GIS data

- [Alternative A Forestwide](#)**
- [Alternative A Geographic Area](#)**
- [Alternative B Forestwide](#)**
- [Alternative B Geographic Area](#)**
- [Alternative C Forestwide](#)**
- [Alternative C Geographic Area](#)**
- [Alternative D Forestwide](#)**
- [Alternative D Geographic Area](#)**

[Downloadable Timber Suitability GIS data](#)

Interactive Storymaps (coming soon!)

Lynn Padgett

From: d1bocc@mtngeogeek.com
Sent: Wednesday, November 3, 2021 8:06 PM
To: 'Lynn Padgett'
Subject: FW: Story maps are live!

From: USDA Forest Service <forestservice@public.govdelivery.com>
Sent: Thursday, September 23, 2021 11:54 AM
To: d1bocc@mtngeogeek.com
Subject: Story maps are live!

Happy Autumn everyone,

We're excited to announce the availability of three interactive online story maps. Click [here](#) to view in detail the wild and scenic river process, the wilderness process and management area framework by alternative. You can switch back and forth on the tabs to compare the alternatives to one another. We hope you find these useful in your analysis and in submitting your comments. You can view the rest of our draft plan documents [here](#) and submit your comment [here](#).

Stay tuned for the recreation story map that will compare recreation settings across the Forests. We look forward to hearing from you and remember the deadline to submit comments is November 12th.

-The GMUG planning team

Update your subscriptions, modify your password or email address, or stop subscriptions at any time on your [Subscriber Preferences Page](#). You will need to use your email address to log in.

This service is provided to you at no charge by [US Forest Service](#).

This email was sent to d1bocc@mtngeogeek.com using GovDelivery Communications Cloud on behalf of: USDA Forest Service · 1400 Independence Ave., SW · Washington, DC 20250-0003 · 1-800-832-1355



Lynn Padgett

From: d1bocc@mtngeogeek.com
Sent: Wednesday, November 3, 2021 8:06 PM
To: 'Lynn Padgett'
Subject: FW: Recreation Story Map now live and Recreation Settings Public Meeting 10/19 5:30-7 pm

From: USDA Forest Service <forests@public.govdelivery.com>
Sent: Friday, October 8, 2021 8:02 AM
To: d1bocc@mtngeogeek.com
Subject: Recreation Story Map now live and Recreation Settings Public Meeting 10/19 5:30-7 pm

Hi again friends and neighbors of the GMUG National Forests,

It is with great excitement that we announce the availability of our final interactive storymap. Click [HERE](#) to view the recreation story map. This is a useful tool for comparing Summer and Winter recreation settings for each of the alternatives. It can also be used to see the differences from the 1983 plan direction and our current inventories. Lots of information to unpack here, but we hope this will help inform your site-specific comments on areas you support or areas where you'd like to see something different. You can influence the final alternative by submitting your comment [HERE](#). Don't forget to get it in by November 12th, 2021, the deadline for the 90-day comment period.

On Tuesday October 19 from 5:30 to 7:00 pm, the National Forest Foundation and the GMUG planning team will be hosting an additional engagement session geared specifically to Recreation Settings. This topic has generated a lot of interest and even some confusion. This will be an opportunity to seek clarity and ask questions regarding the Recreation Opportunity Spectrum before the comment period closes on November 12. You can attend the meeting by clicking [HERE](#) or at the link below.

We hope you're enjoying your National Forests this Autumn whether it's leaf peeping, hiking, hunting or whatever you like the most! Stay tuned for more potential opportunities to engage in the forest plan revision.

showing public materials provided as of November 1, 2021.

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(970) 874-6600[Ranger Districts](#)[Rocky Mountain Region](#)[Contact Us](#)Draft Revised Forest Plan and DEISWelcome to the newest addition to our planning website! [Click here to go back to our main forest planning page.](#)

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*Geographic Area maps provide a zoomed-in view of smaller, discrete areas on the forest: the Uncompahgre Plateau, the Grand Mesa, etc.

Management area maps and GIS data[Alternative A Forestwide](#)[Alternative A Geographic Area](#)[Alternative B Forestwide](#)[Alternative B Geographic Area](#)[Alternative C Forestwide](#)[Alternative C Geographic Area](#)[Alternative D Forestwide](#)[Alternative D Geographic Area](#)[Wilderness Management Area](#)***[Downloadable Management Area GIS data](#)******[Downloadable Management Area Overlays GIS data](#)******[Downloadable Continental Divide National Scenic Trail GIS data](#)***Scenic Integrity Objective (SIO) maps[Alternative A Forestwide](#)[Alternative B Forestwide](#)[Alternative C Forestwide](#)[Alternative D Forestwide](#)***[Downloadable Scenic Integrity Objective GIS data](#)***Summer Recreation Opportunity Spectrum maps and GIS data[Existing Inventory Forestwide](#)[Existing Inventory Geographic Area](#)[Alternative B Forestwide](#)[Alternative B Geographic Area](#)[Alternative C Forestwide](#)[Alternative C Geographic Area](#)**Quick Links**[Forest Plan Revision Home](#)
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Alternative D Forestwide

Alternative D Geographic Area

******Downloadable Summer and Winter ROS GIS data******

Interactive Recreation Storymap (coming soon!)

Winter Recreation Opportunity Spectrum maps and GIS data

Existing Inventory Forestwide

Existing Inventory Geographic Area

Alternative B Forestwide

Alternative B Geographic Area

Alternative C Forestwide

Alternative C Geographic Area

Alternative D Forestwide

Alternative D Geographic Area

******Downloadable Summer and Winter ROS GIS data******

Existing Winter Travel Management

Timber Suitability maps and GIS data

Alternative A Forestwide

Alternative A Geographic Area

Alternative B Forestwide

Alternative B Geographic Area

Alternative C Forestwide

Alternative C Geographic Area

Alternative D Forestwide

Alternative D Geographic Area

******Downloadable Timber Suitability GIS data******

5. Appendix E: *Brief Synopsis of Available Science on Buffer Effectiveness for Conservation of Mountain Fens, USFS Rocky Mountain Region (R2)* dated February 25, 2020. Author: USDA USFS Rocky Mountain Research Station Research Ecologist Kathleen Dwire.

Brief Synopsis of Available Science on Buffer Effectiveness for Conservation of Mountain Fens, USFS Rocky Mountain Region (R2)

Kate Dwire, Research Ecologist, USFS Rocky Mountain Research Station, Ft. Collins CO
February 25, 2020

Background

Designated, fixed width 'riparian' buffers along streams and around wetlands vary by USFS region and among forests within regions. For example, in the USFS Rocky Mountain Region (R2), designated buffers are set at 100'; in the USFS Northern Region (R1), designated buffers vary, depending on location and fish habitat (100', east of the continental divide; 300', west of the divide). Riparian buffer distance widths were designated to protect streams and lotic (flowing water) aquatic habitat; the same buffer width distances were then applied to lentic (still water) habitats, such as wetlands and lakes to include all 'riparian habitat'. Considerable scientific information is available on the effectiveness of riparian buffers in protecting streams and fish habitat (Wenger 1999; Mayer et al. 2005); however, few studies have examined the extent to which riparian buffers protect the various valued functions and characteristics of wetlands. Fens are groundwater-supported, peat-accumulating wetlands, with characteristics distinct from other wetland types. Fens occur in various geomorphic landscape settings (e.g. slope, basin), may have distinctive water chemistry (acidic (poor), basic (rich)) and are dominated by forest, shrub, or herbaceous vegetation components. Different fen types could respond differently to management treatments.

Valued Characteristics and Functions of Mountain Fens

Fens are irreplaceable ancient ecosystems, requiring thousands of years to develop; the fens on the GMUG NF are likely 8000-10,000 thousand years old (Chimner and Cooper 2002). Once degraded, restoration of fens can be challenging and expensive (Cooper et al. 1998).

Ecosystem services of functioning fens include contribution to local and regional biodiversity; provision of habitat for amphibians and rare plants; water storage; and carbon sequestration (functioning fens are sinks for atmospheric carbon). Evaluation of buffer effectiveness has usually focused on one or more selected ecosystem service or value (Glaves et al. 2013). While a fixed buffer width could provide effective protection of one value or function, it may not be adequate to protect others (Jones 2003).

The protection of the groundwater source(s) and the peat body itself are critical to maintain fen functions and valued characteristics, particularly habitat value, and water and carbon storage. Buffers must also be large enough to retain sediment and nutrient input from upland management activities.

Potential Threats of Forest Management Activities on Mountain Fens

Alteration of Hydrology:

Fens are sustained by groundwater discharge and are highly sensitive to changes in groundwater flow (Drexler et al, 2013). Interruptions and alterations in groundwater flow paths can lower the fen water table, leading to desiccation of the peat body, changes in habitat for rare plant species, and reductions in water and carbon storage. Alterations of groundwater sources can also influence groundwater chemistry (pH, ion/cation concentrations, metals), which is critical for maintenance of the most vulnerable and rare fens (rich and poor fens) and the habitats they provide for rare biota (Chadde et al. 1998; Heidel et al. 2017). Groundwater sources are challenging to characterize but must be taken into consideration during project planning in areas containing fens and other wetlands (Basin Hydrology

2017). The impact of forest harvest on groundwater sources as well as the effectiveness of buffers in protecting groundwater sources are largely unknown

Sediment and Nutrient Input:

Forest harvest activities frequently result in sediment and nutrient inputs to streams and wetlands (Welsch et al. 1995; Wenger 1999; Mayer et al. 2005), which can alter water and soil properties and influence vegetative composition. There is strong scientific support that fixed buffer widths mitigate these impacts, but the science is less conclusive regarding fen wetlands.

In NW Montana, Jones found that a 100' wetland buffer was not adequate to protect vulnerable fens (poor and rich fens) from nutrient enrichment, which then altered the fen vegetation and habitat conditions for rare fen plants of concern. On the Grand Mesa, GMUG Botanist Barry Johnston (retired) monitored four fens adjacent to the Skinned Horse timber sale from 2007 – 2011 (pre and post-harvest). He found that with a 100' buffer, annual variation in fen vegetation was within the expected natural range of variability. Three fens showed increases in sediment in 2011, which was attributed to a dust-on-snow event; nutrient levels were not measured (Johnston et al. 2011).

Sloping fens and basin fens adjacent to steep hillslopes naturally receive sediment inputs but pulses due to management activities in the surrounding uplands should be avoided as a best management practice (Welsch et al. 1995).

Impacts of Prescribed Burning and Wildland Fire:

In parts of the USA (Middleton et al. 2006; Austin and Newton 2019) and Europe (Glaves et al. 2013), prescribed fire is routinely used in peatlands to maintain certain vegetative characteristics, usually related to wildlife habitat. The effectiveness of buffer width in preventing impacts of upland prescribed fire treatments (sediment and nutrient input) on mountain fens is largely unknown. However, functioning fens with high water tables, saturated soils, and moist fuels do not burn readily. Mountain fens have developed in the context of upland fire regimes, and most have withstood numerous natural wildfires. Some have partially burned or received sediment pulses during natural events. However, for impacted fens, e.g. those with desiccated portions and/or exposed peat soils, wildfire can have long-term negative impacts (Sulwinski et al 2017).

Unknowns:

- Impacts of heavy logging equipment on subsurface hydrology and groundwater sources?
- Effectiveness of buffers in protecting groundwater sources from heavy logging equipment?
- Impacts of large-scale canopy removal on groundwater sources, surface and sub-surface hydrology?
- Impacts of different treatments on nutrient and sediment inputs to fens?
- Effectiveness of buffers in protecting fens (and fen vegetation) from sediment and nutrient pulses resulting from upland management treatments?
- Will different fen types respond differently to upland treatments?

Recommendations:

- Keep all heavy equipment away from fens and out of the 100' buffer to minimize soil compaction and impacts on subsurface chemistry and flow paths;
- Identify vulnerable and highly valued fens, including large fens, iron fens, calcareous fens, acid fens, fens that support rare biota. Prioritize fens in treatment areas and provide special consideration/ protection to large fens, unusual fens, and fens in 'pristine' condition.

- Monitor water levels and water quality in a selected group of high priority fens to assess impacts of management activities.
- Design projects and treatments to avoid impacting the function/ ecological services and biotic resources of fens.
- Ensure continued viability of fen habitats for species of conservation concern.

References:

Austin, G. and D.J. Cooper. 2015. Persistence of high elevation fens in the Southern Rocky Mountains, on Grand Mesa, Colorado, USA. *Wetlands Ecology and Management* DOI 10.1007/s11273-015-9458-7.

Austin, J.E. and W.E. Newton. 2018. Response of vegetation in open and partially wooded fens to prescribed burning at Seney National Wildlife Refuge. USDI, US Geological Survey, Scientific Investigations Report 2018-5168.

Basin Hydrology, Inc. 2017. A preliminary investigation into water sources of Iron Fens in Mineral creek Basin, San Juan County, Colorado. Basin Hydrology Inc., Durago, CO. 42 pages + appendices.

Chadde, S.W., Shelley, S.J., Bursik, R.J., Moseley, R.K., Evenden, A.G., Mantas, M., Rabe, F., Heidel, B. 1998. Peatlands on National Forests of the Northern Rocky Mountains: Ecology and Conservation. Gen. Tech. Rep. RMRS-GTR-11. Ogden, UT: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 75 p.

Chimner, R.A. and D.J. Cooper. 2002. Modeling carbon accumulation in Rocky Mountain fens. *Wetlands* 22: 100-110.

Cooper, D.J., L.H. McDonald, S.K. Wenger, and S.W. Woods. 1998. Hydrologic restoration of a fen in Rocky Mountain National Park, Colorado, USA. *Wetlands* 18(3); 335-345.

Drexler, J.Z., Knifong, D., Tuil, J., Flint, L.E., Flint, A.L. 2013. Fens as whole-ecosystem gauges of groundwater recharge under climate change. *Journal of Hydrology* 481: 22-34.

Glaves, D., Morecraft, m., Fitzgibbon, C., Owen, M., Phillips, S., Leppitt, P. 2013. Natural England Review of Upland Evidence 1012- The effects of managed burning on upland peatland biodiversity, carbon and water. *Natural England Evidence Review*, Number 004.

Heidel, B., Fertig, W., Mellman-Brown, S., Houston, K.E., Dwire, K.A. 2017. Fens and their rare plants in the Beartooth Mountains, Shoshone National Forest, Wyoming. Gen. Tech. Rep. RMRS-GTR-369. Ft. Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 110 p.

Johnston, B.C., Almy, J.M., Young, W.R., Austin, G.T. and K Tattersall. 2011. Report on monitoring of fens for Ward Lake Vegetation Management Projects: Skinned Horse Timber Sale, 2011 update. Delta, CO: USDA Forest Service, Grand Mesa-Uncompahgre-Gunnison National Forests.

Johnston, B.C., Stratton, B.T., Young, W.R., Mattson, L.L., Almy, J.M. and G.T. Austin. 2012. Inventory of fens in a large landscape of West-Central Colorado. *GMUG National Forests*. 198 pages.

Jones, W.M. 2003. Kootenai National Forest Peatlands: Description and Effects of Managements. Montana Natural Heritage Program, Natural Resource Information System, Montana State Library.

Mayer, P.M., Reynolds, S.K., Canfield, T.J. 2005. Riparian buffer width, vegetative cover, and nitrogen removal effectiveness: a review of current science and regulations. EPA/600/R-05/118.

Middleton, B.A., Holsten, B., van Diggelen, R. 2006. Biodiversity management of fens and fen meadows by grazing, cutting and burning. *Applied Vegetation Science* 9: 307-316.

Wenger, S. 1999. A review of the scientific literature on riparian buffer width, extent and vegetation. Office of Public Service and Outreach, Institute of Ecology, University of Georgia. 59 pages.

Sulwinski, M., Metrak, M., Suska-Malawska, M. 2017. Long-term fire effects of the drained open fen on organic soils. *Archives in Environmental Protection* 43(1):11-19.

6. Appendix F: Ouray County “Fatal Flaw” Cooperating Agency comments on the May 2021 DRLMP dated July 16, 2021.

This document is included so that it may be part of the public record. Our November 26, 2021 comments supercede our July 16, 2021 comments where there are conflicts.



BEN TISDEL

LYNN M. PADGETT

JAKE NIECE

BOARD OF COUNTY COMMISSIONERS

P.O. Box C • Ouray, Colorado 81427 • 970-325-7320 • FAX: 970-325-0452

July 16, 2021

Attn: Chad Stewart, GMUG Forest Supervisor; Tammy Randall Parker, Public Services Staff Officer; Samantha Staley, Forest Planner; Jonathan Tucker, Asst. Forest Planner; GMUG Forest Plan Revision Team
2250 South Main St
Delta, CO 81416

Via email to: chadstewart@fs.fed.us ; tamera.randall-parker@usda.gov ; samantha.j.staley@usda.gov ;
jonathan.tucker@usda.gov

RE: Ouray County Cooperating Agency "Fatal Flaw" Comments on the May 17, 2021 DRLMP Document

Dear Responsible Official(s) and Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests Planning Team,

Thank you for the opportunity to preview the proposed Draft Revised Land Management Plan (DRLMP) provided to us in mid-May. On May 17, 2021, we received the DRLMP and the first two chapters of the Draft Environmental Impact Statement (DEIS) coincidental with the May 17 cooperating agency meeting. On June 7, 2021, draft GIS files for the draft Recreational Opportunity Spectrum (ROC), draft Timber Suitability, and draft Management Areas were made available to cooperating agencies to assist us in our review.

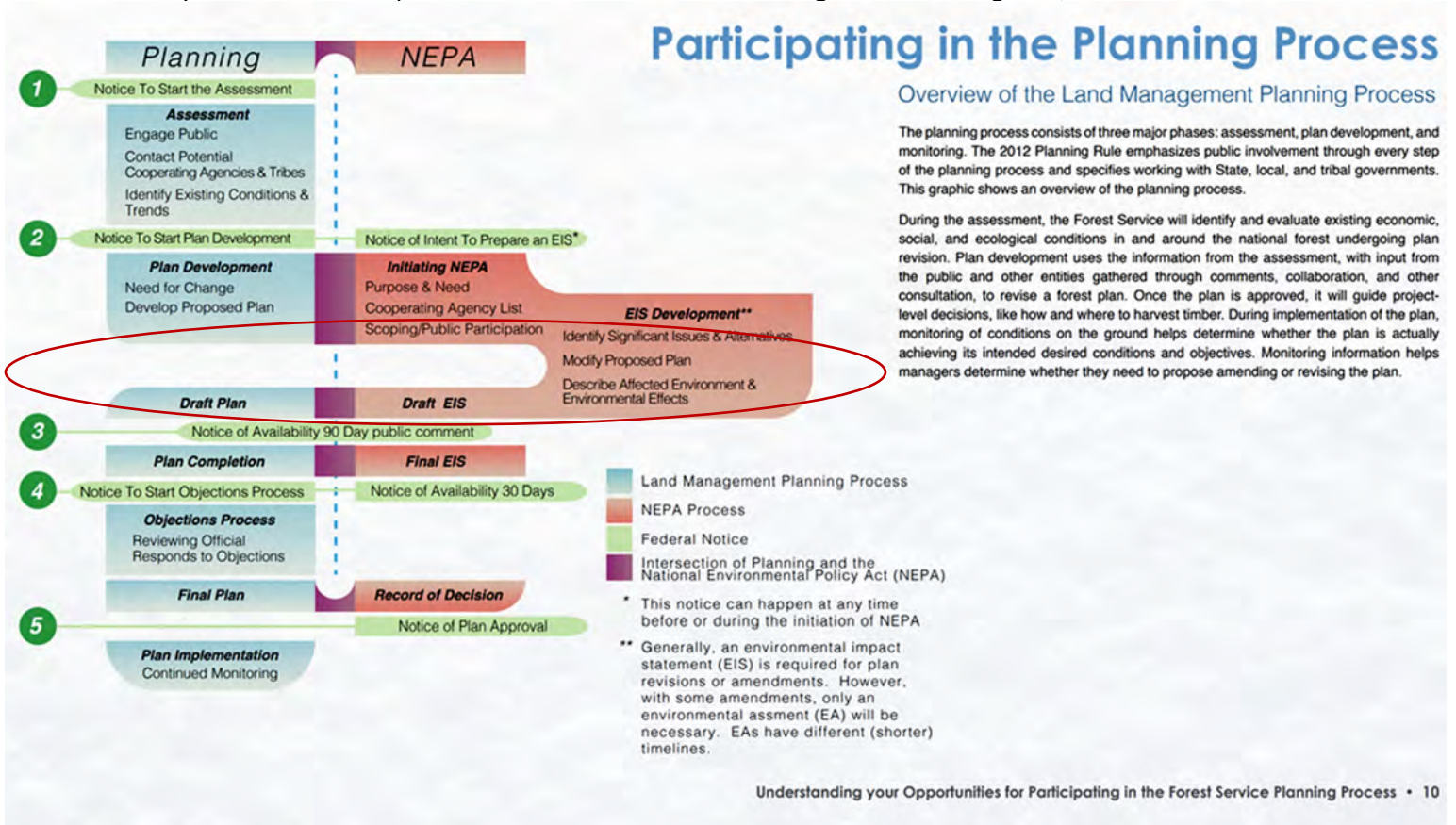
It is important to note that this DRLMP is developed under the requirements set forth in the 2012 Forest Planning Rule. In the U.S. Forest Service's own words, a "key facet of this new Planning Rule is that it emphasizes the Forest Service's responsibility to engage with the public and to work more closely with State, local, and Tribal Governments when national forest managers amend or revise their forest plans."¹

We understand the different responsibilities and authorities of our agencies in the forest plan revision process and that the U.S. Forest Service (USFS) has the final decision. The plan revision process presented by the USFS² shows that EIS Development occurs after developing the proposed plan and initiating NEPA. It also shows that the EIS Development is where the Significant Issues & Alternatives are developed, the proposed plan is modified, and the Affected Environment and Environmental Effects are analyzed. The availability of the Draft

¹ U.S. Department of Agriculture (USDA) U.S. Forest Service (USFS). (September 2016). *Trifold overview to A Guide for State, Local, and Tribal Governments* [Brochure]. Author. Retrieved July 12, 2021, from https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd530776.pdf; PDF Page 1.

² USDA USFS, Washington D.C. Office. (September 2016). *Understanding Your Opportunities for Participating in the Forest Service Planning Process A Guide for State, Local, and Tribal Governments* [Rep]. Federal Advisory Committee on Implementation of the 2012 Land Management Planning Rule. Retrieved July 12, 2021, from https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd520672.pdf; PDF Page 10.

Plan and Draft EIS are contemporaneous in the 2012 Planning Rule process diagram created by the Federal Advisory Committee on Implementation of the 2012 Land Management Planning Rule, circled below:



Source: *Understanding Your Opportunities for Participating in the Forest Service Planning Process A Guide for State, Local, and Tribal Governments* prepared by the Federal Advisory Committee on Implementation of the 2012 Land Management Planning Rule, September 2016.

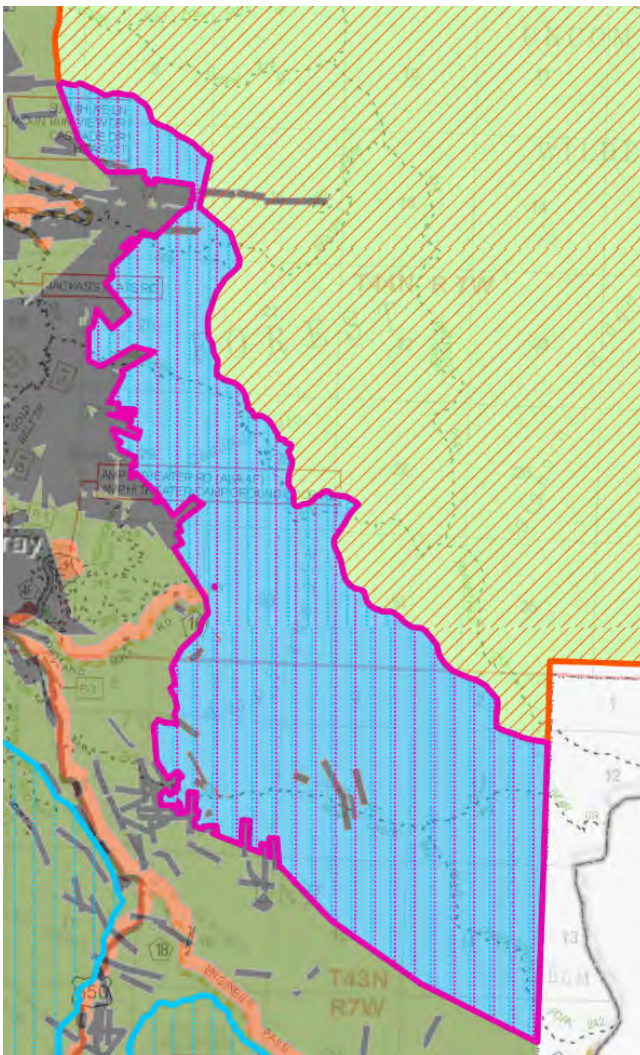
In a July 6, 2021 letter from the Ouray County Board of County Commissioners (BOCC) to the GMUG Forest Supervisor and Planning Team, we requested an extension of the cooperating agency review period so that the DRLMP could be considered contemporaneously alongside the EIS.³ We also hoped to have the full set of GIS files to facilitate our review, including scenic integrity objectives. As requested by Forest Supervisor Chad Stewart, we are attempting to identify "fatal flaws" or issues that would cause us to not support the plan at a very high level. Therefore, we did not dive into the specific management approaches for each resource. The exception is fens because fair treatment of these unique and critical ground-water dependent systems separately from surface-water dominated riverine riparian wetlands is missing from the DRLMP. The following

³ On July 6, 2021, Ouray County BOCC wrote to the GMUG Forest Supervisor, "In order to provide helpful, informed, and targeted input regarding the alternatives and content of the draft plan, it is essential that we understand how the draft Plan's different alternatives affect the forest, ecosystems, and have different socio-economic and environmental consequences. Therefore, we are respectfully requesting that the 60-day cooperating agency comment period be extended to 60-days from the date the USFS provides us with the draft EIS, not just the first two chapters. The amount of effort on behalf of the GMUG Planning Team to revise the GMUG Forest Plan under the 2012 Planning Rule is apparent and commendable. It is exciting to be close to the draft Plan and draft EIS milestone. We appreciate the GMUG's commitment to working closely with state and local cooperating agencies."

flaws or issues we have identified so far should not be considered comprehensive or exhaustive. When we have more time with the complete DLRMP and DEIS, maps, and all related GIS files, we may have new concerns.

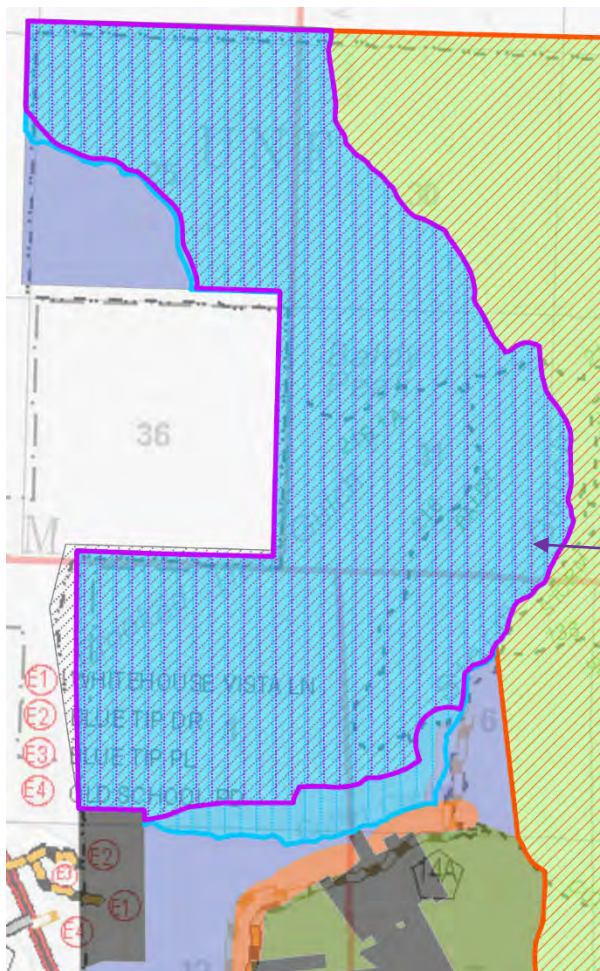
1. Areas to be Analyzed as Wilderness:

A. Unanimous BOCC support to include the "Bear Creek Addition to the Uncompahgre Wilderness" in the agency's preferred alternative as "Area to be Analyzed as Wilderness (MA 1.2)." The preferred alternative should incorporate two of the "Citizens' Proposal" proposed wilderness parcels as "Recommended Wilderness." In our July 6 letter, we indicated clear unanimous support from the Ouray County Board of County Commissioners (BOCC) for the Bear Creek Addition to the Uncompahgre Wilderness being incorporated into the agency's preferred alternative with a recommendation for designation of Wilderness. We subsequently provided Jonathan Tucker the GIS shapefile of this approximately 6,000-acre parcel, and it was determined that the lands within the proposed Bear Creek Addition parcel are considered in the DRLMP Alternative D. **In addition, for this parcel, the Summer and Winter Recreational Opportunity Spectrum (ROS) in the agency's preferred alternative should be the same as provided in Alternative D, Primitive. The Timber Suitability in the agency's preferred alternative should be the same as provided in Alternative D (no timber suitability identified).**



Left: Screen-shot of the proposed Bear Creek addition to the Uncompahgre Wilderness parcel (bright pink outline). It is very closely aligned to the Alternative D: Area to be Analyzed as Wilderness (MA 1.2) in bright blue. The base map is our County Road and Public Access Routes map.

B. Unanimous BOCC support to include the "Baldy Addition to the Uncompahgre Wilderness" in the agency's preferred alternative as "Area to be Analyzed as Wilderness/Colorado Roadless Area (MA 1.2/3.1)." Since July 6, the Ouray County BOCC has carefully examined the 2,400-acre parcel called "Baldy Addition" to the Uncompahgre Wilderness" contained in the Citizens' Proposal. We note that the "Baldy C&H" grazing allotment is mapped in both the existing designated Uncompahgre Wilderness while also extending into the 2,400-acre proposed Baldy Addition and therefore did not present a conflict. We identified that the extreme south/southeastern Citizens' Proposal polygon extends beyond the "Baldy" Colorado Roadless Area parcel. We have modified the boundary from the Citizens' Proposal (which you may have received from another source) to show the area we support being included in the final agency's preferred alternative as "Recommended Wilderness," matching the south/southeastern limit of the Baldy Roadless parcel. The lands within the proposed Baldy Addition to the Uncompahgre Wilderness are currently considered in the DRLMP Alternative D. **In addition, for this parcel, the Summer and Winter Recreational Opportunity Spectrum (ROS) in the agency's preferred alternative should be the same as provided in Alternative D, Primitive. The Timber Suitability in the agency's preferred alternative should be the same as provided in Alternative D (no timber suitability identified).**



Left: Screen-shot of the proposed Baldy addition to the Uncompahgre Wilderness parcel (bright purple outline). It is very closely aligned to the Alternative D: Area to be Analyzed as Wilderness/Colorado Roadless Area (MA 1.2/3.1) in bright blue; however, we would like the southeast portion of this parcel to be clipped to the existing Baldy-Colorado Roadless Area (diagonal gray hatching) as depicted in the bright purple outline. The basemap is the Ouray Draft Road Map 2009 - transportation map showing public access routes.

*Baldy Roadless Area with a purple outline showing the portion of the community proposal's "Baldy Addition" that Ouray County BOCC supports as "Area to be Analyzed as Wilderness/Colorado Roadless Area" (MA 1.2/3.1).

- C. Attached are the fact sheets regarding the conservation values and outstanding wilderness characteristics for both the Baldy Addition and the Bear Creek Addition. We will provide the shapefiles of the two wilderness parcels that we support being recommended as Wilderness.
- D. We are grateful that both Alternatives B and D include the lands within the Colorado Outdoor Recreation and Economy (CORE) Act and preceding San Juan Wilderness Act as Recommended Wilderness. Please ensure that the final agency's preferred alternative includes these CORE Act parcels as Recommended Wilderness.

2. **Lands within the Community Conservation Proposal (previously known as Citizens' Conservation Proposal) Abrams Mountain parcel:**

- A. The BOCC believes that the objectives of the Community Conservation Proposal for an Abrams Mountain Scenic Special Interest Area can be achieved through a combination of appropriate Management Area classification, winter/summer ROS classifications, and Timber Suitability. We have not been provided information on the scenic integrity to comment on that at this time, but preserving scenic resources is essential on this parcel. The lands within the Abrams Mountain parcel seem to be mismatched in the Alternative A existing Management Area (M.A.) classification vs. the existing ROS classifications. The existing ROS is semi-primitive non-motorized (SPNM), but the existing M.A. is provided in the GMUG's GIS as semi-primitive motorized. Alternatives B and D continue the mismatch to some degree. **Regardless, the agency's preferred alternative should be Semi-Primitive Non-Motorized Recreation Activities (MA: 3A). Both the summer and winter ROS in the agency's preferred alternative should be consistent with this existing characteristic and be SPNM. The Timber Suitability should be similar to Alternative D – no suitability above 40% slope.** There are less than four acres of suitable timber within this parcel in Alternative D. However, Alternatives C and B identify hundreds of acres of suitable timber for slopes between 40-123%, which is incompatible with the special conservation and scenic values. The Iron-ton fen and wetland complex at the toe of these slopes provide important ecosystem services and is sensitive to hydrological disturbances and sedimentation. To preserve the non-motorized uses, scenic integrity, and special characteristics of this parcel and Iron-ton area, **the agency's preferred alternative should not include any Timber Suitability within this parcel. It is a fatal flaw of the DRLMP to manage the lands within the Abram parcel as "General Forest," which is currently the management category provided in Alternative B.**



At left is the Abrams parcel (bright blue boundary center-right), described in the Community Conservation Proposal. The jade-green outlined areas are fens mapped by Colorado Natural Heritage Program (CNHP) and Mountain Studies Institute. The USFS geospatial clearing house trails TrailNFS_Publish layer shows the Gray Copper Gulch trail is non-motorized where it passes through the Abrams parcel. The Brown Mountain Road shown penetrating the western boundary of the parcel is actually gated closed west of the parcel, and there is no motorized access.

- * Gray Copper Gulch Trail
- * Brown Mountain Road
- * Crystal Reservoir
- * Fen Complex (wetlands on the east side of US 550 not shown).

3. Lands within the Community Conservation Proposal (previously known as Citizens' Conservation Proposal) Hayden parcel:

A. The BOCC believes that the objectives of the Community Conservation Proposal for the Hayden Mountain Scenic Special Interest Area can be achieved through a combination of appropriate Management Area classification, winter/summer ROS classifications, and Timber Suitability. We have not been provided information on the scenic integrity to comment on that at this time, but it is essential to preserve scenic resources on this parcel. The lands within the Hayden Mountain parcel also seem to be mismatched in the Alternative A existing Management Area (M.A.) classification vs. the existing ROS classifications. The existing M.A. category (Alternative A) is semi-primitive motorized in the southern half to primitive non-motorized in the northern half. However, the existing (Alternative A) is SPNM throughout the parcel. Alternatives B and D

continue the mismatch by proposing a "General Forest" management category. **Regardless, the agency's preferred alternative should be Semi-Primitive Non-Motorized Recreation Activities (MA: 3A). Both the summer and winter ROS in the agency's preferred alternative should be consistent with this existing characteristic and be SPNM. The Timber Suitability should be similar to Alternative D – no suitability above 40% slope.** There are less than 18 acres of suitable timber within this parcel in Alternative D. However; Alternative B identifies roughly 3,200 acres of suitable timber. Calculating using ArcGIS tools, the mean slope of the suitable timber in Alternative B within this Hayden parcel appears to be 59%. It appears that less than 300 acres out of the 3,200 acres of identified suitable timber in Alternative B are on slopes less than 40%. The agency's preferred alternative B shows suitable timber in and adjacent to fen and wetland complexes which is unacceptable for protecting these critical resources. There are no existing roads above where the so-called suitable timber is mapped, so to harvest, roads would have to be cut in. This area is incompatible with harvesting timber on slopes from 40-105%. The Ironton fen and wetland complex at the toe of these slopes provide important ecosystem services and is sensitive to hydrological disturbances and sedimentation. To preserve the non-motorized uses, scenic integrity, and special characteristics of this parcel and Ironton area, **the agency's preferred alternative should not include any Timber Suitability within this parcel. It is a fatal flaw of the DRLMP to manage the lands within the Hayden parcel as "General Forest," which is currently the management category provided in Alternative B instead of semi-primitive non-motorized.**

Below is a screenshot showing the geospatial relationships of CHNP and MSI fens, CNHP Potential Conservation Areas having high bio-diversity and special ecosystems, and the Timber Suitability identified in Alternative B. This parcel should be managed to retain its roadless and primitive to semi-primitive characteristics, special habitats and ecosystems, and non-motorized public access routes.

While Spirit Gulch does have a double-track leading up to a private interest, it is our understanding that this route is currently unused and revegetating. The Mears trail and County Road 20W at the west edge of Long Park and Crystal Reservoir allow for mechanized use, but not motorized, which is controlled by a locked gate near the Crystal River dam and Highway 550. It appears that there are several existing non-motorized trails missing from the USFS NSF trails GIS file downloaded from the USFS national geospatial data clearinghouse the week of July 11, 2021, and also missing from the USFS trails and road MVUM GIS layers. **Please compare the County**

Road and public access route documents^{4,5,6} to your trails inventory within this parcel and the Abrams parcel. These maps were products resulting from several years of meetings of the interagency collaborative Public Access Group, which sought to identify historic public access routes in Ouray County, regardless of jurisdiction. USFS, along with the Ouray Trails Group, participated in the Public Access Group.

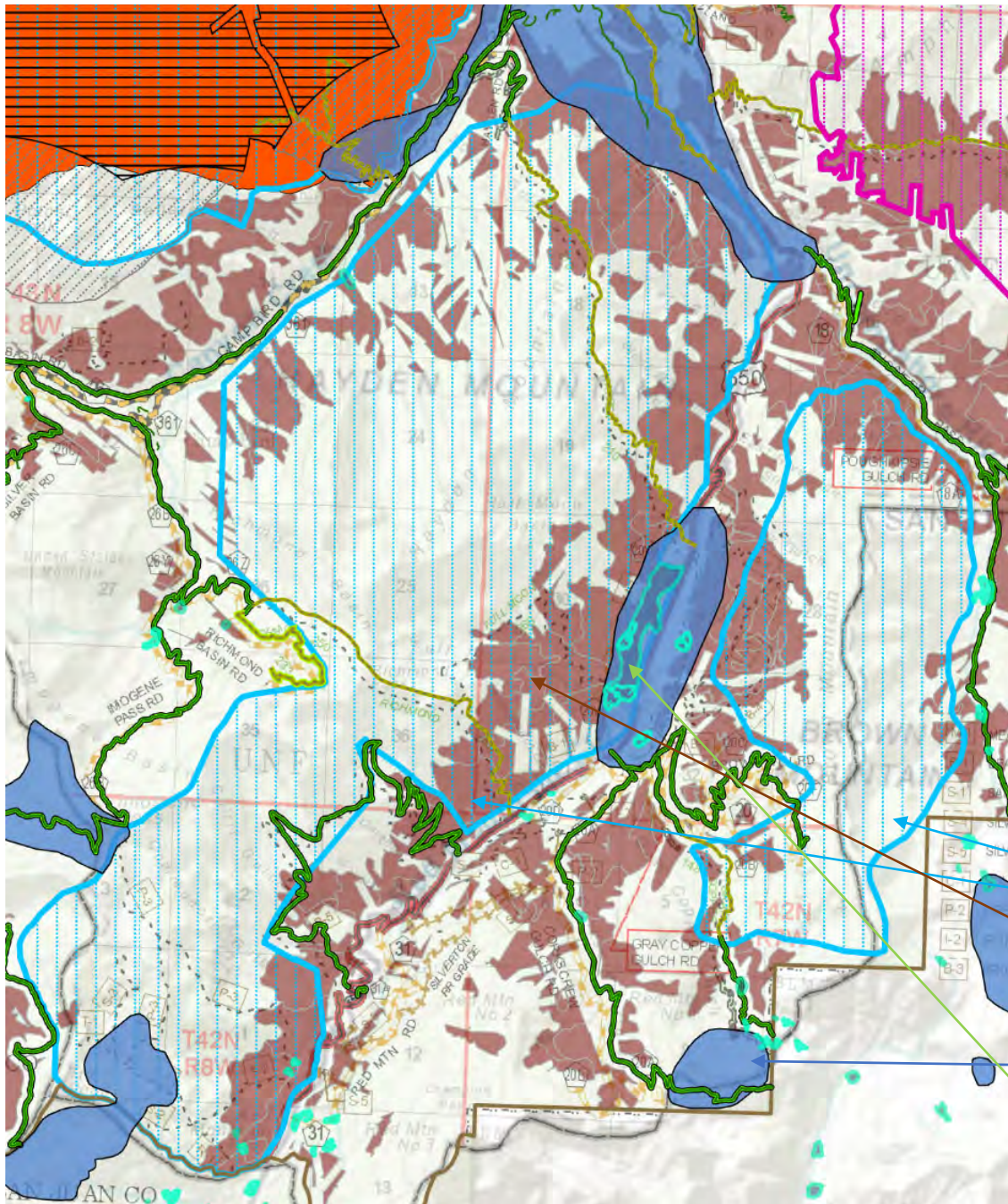
⁴ Ouray County IT Department. (2009). *Ouray Draft Road Map 2009 - transportation map ONLY, NOT up to date w/current Official County Road Map*. [Map]. Bockes, Jeff. Retrieved July 12, 2021, from <https://ouraycountyco.gov/DocumentCenter/View/152/DRAFT-2009-Road-Map-transportation-only-not-Official-road-map?bidId=> ; PDF. (Note: This is A draft (2009) 48" x 36" map showing County Roads and Other roads (private, Forest Service, etc.), useful to navigate in Ouray County. See 'Official County Road Map for the current County- maintained routes.)

⁵ Ouray County. (2014). *Official Ouray County Road Map, July, 2014 - showing Public Routes ONLY, not a complete transportation map*. [Map]. Ouray County Board of County Commissioners and Bockes, Jeff. Retrieved July 12, 2021, from <https://ouraycountyco.gov/DocumentCenter/View/2476/2014-014-Exhibit-A---Ouray-County-Road-Map?bidId=> ; PDF. (Note: Official County Road Map, showing County maintained routes and other Public Routes in the county. NOT a complete transportation map, - private routes, etc. not shown. (Resolution 2014-014, Exhibit A).)

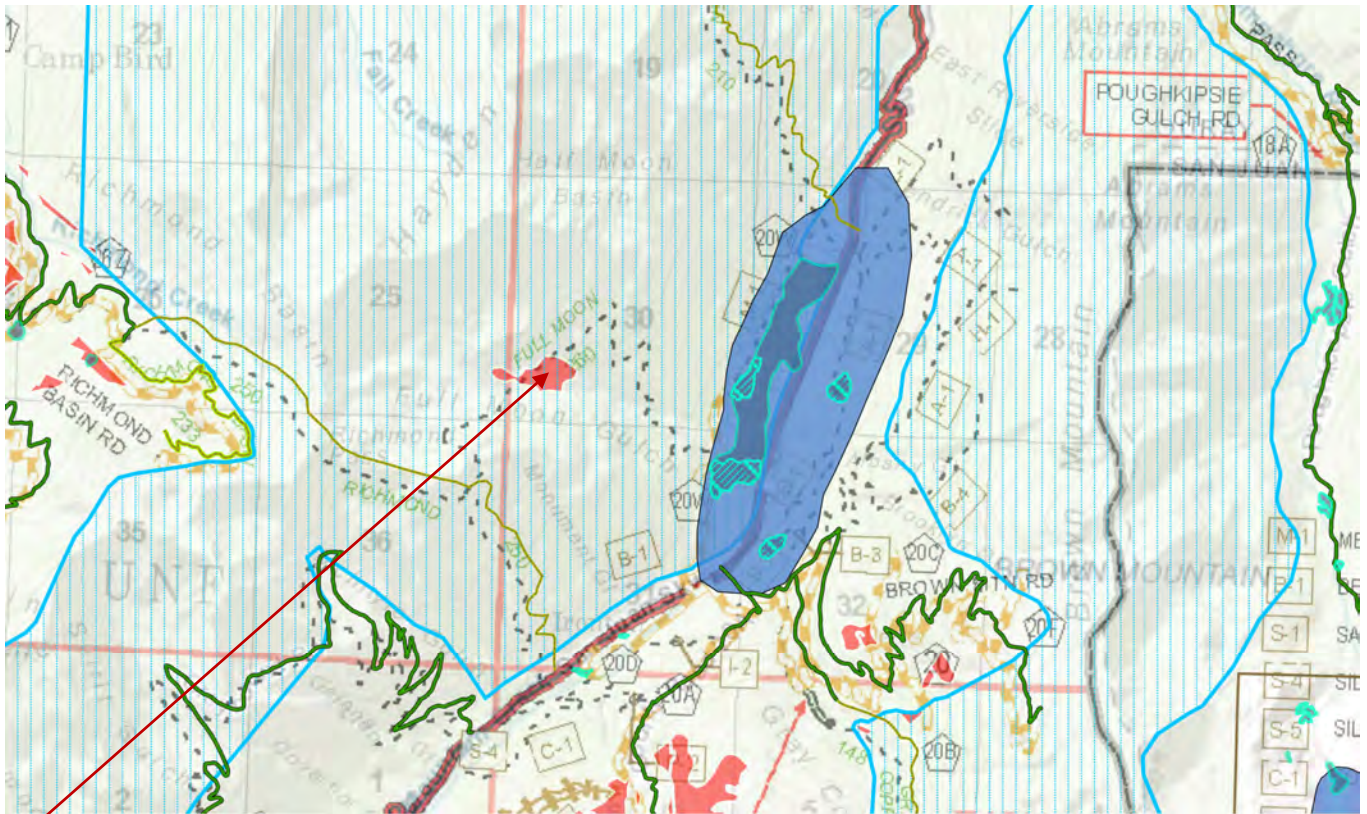
⁶ Ouray County. (2014). *Ouray County Historic Route Index*. [Index]. Ouray County Board of County Commissioners and Bockes, Jeff. Retrieved July 12, 2021, from <https://ouraycountyco.gov/DocumentCenter/View/2477/2014-014-Exhibit-B---Ouray-County-Historic-Route-Index?bidId=> ; PDF. (Note: Chart showing historic and current mapping and other documents which support Public Routes shown on the Official Ouray County Road Map (Resolution 2014-014, Exhibit B).)

This figure is a screenshot showing the Abrams parcel on the east (right) and the Hayden parcel on the west (left). The agency's preferred Alternative B Timber Suitability is visible in brown. The timber identified is mostly greater than 40% slopes as discussed above and would compromise critical fen and wetland complexes. These

complexes are seeing an increased presence of moose. In blue are CNHP "Potential Conservation Areas," which are described as having special and sensitive bio-diversity characteristics that should be conserved. The basemap is the Ouray Draft Road Map 2009 - transportation map showing public access routes.



- *Abrams parcel
- *Hayden parcel
- *DRLMP
- Alternative B Timber Suitability
- *CNHP PCA
- *CNHP and MSI fens



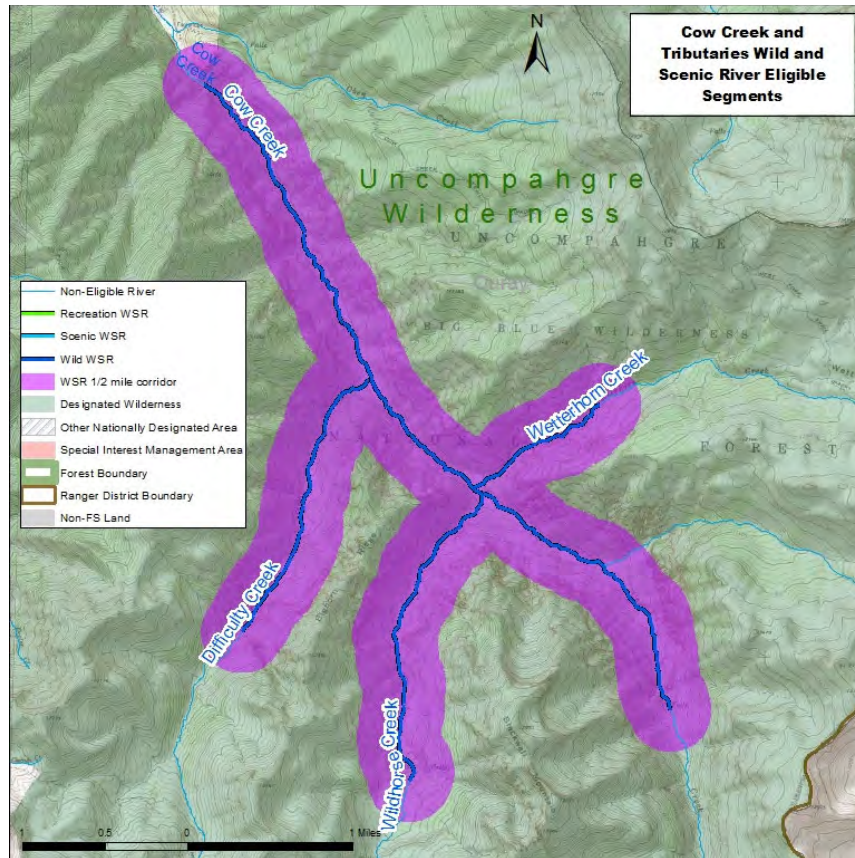
*Alternative B Suitable Timber within the Hayden and Abrams parcels consists of one 17.8-acre polygon. Compare to the roughly 3,200 acres of Alternative D Suitable Timber within just the Hayden parcel above. Despite GMUG's contention that a tiny percentage of suitable timber occurs on steep slopes, the agency's preferred alternative is predominantly steep-slope timber within the areas described in this comment letter.

Showing a 1:24,000 scale close-up of the Abrams and Hayden parcels. Red is the DRLMP Alternative D Timber Suitability. There is only one 17.8-acre polygon within these parcels combined. This highlights how different Alternative D and B are for Timber Suitability. The DRLMP needs to re-think Timber Suitability for its preferred alternative. This close-up also shows Full Moon and other trails not within the NSF Trails, Trails MVUM, and Roads MVUM GIS data layers downloaded from the USFS national geospatial clearinghouse (<https://data.fs.usda.gov/geodata/edw/datasets.php>) around July 11, 2021.

4. BOCC Supports River Segments Found Eligible for Wild & Scenic River Designation within Ouray County:

- A. The Ouray County BOCC unanimously supports identifying the four river segments found in Table 10.1 (excerpt below) and Figure 15 as eligible Wild and Scenic River segments, with the classification of Wild. Please proceed in this direction in the final agency's preferred alternative.

Cow Creek (24) and Tributaries Wetterhorn Creek (24-A), Wildhorse Creek (24-B), and Difficulty Creek (24-C)	10.1	3,187	Ouray	Scenery, Geology	Wild
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DRLMP Figure 15 (USFS).

5. Further consultation and refinement of the Species of Conservation Concern List with Colorado Parks and Wildlife is needed:

- A. Ouray County BOCC considers Colorado Parks and Wildlife (CPW) as the agency experts on Species of Concern. During our review of the DRLMP we noted that there are distinct differences, mostly omissions, of species of conservation concern in the GMUG May 2021 DRLMP and the Rio Grand National Forest RLMP signed in May 2020. For example, Rocky Mountain Big Horn Sheep are on the Rio Grand NF list but not the GMUG.
- B. GMUG should do further consultation and coordination with Colorado Parks and Wildlife to develop the Species of Conservation Concern list. We are concerned about what appear to be omissions of white-tailed ptarmigan, black swift, pinyon jay, Rocky Mountain, and Desert Big Horn Sheep, Townsend Big-eared bat, hoary bat, little brown bat. These three bats can be indicators for impacts of mining, wind energy, white-nose syndrome, or habitat loss for myotis species.

6. Management objectives, standards, and guidelines oversimplify and do not provide suitable recognition of fens as ground-water dependent, peat accumulating wetlands:

- A. Providing a 100-foot surficial buffer around a fen's expression of wetland vegetation or seasonally saturated soil and putting them into the same Category 2 as seeps, springs, lakes, and reservoirs is not adequate to manage the complex hydrology and unique ecology of

fens. GMUG's management prescription for fens should emphasize a commitment to continued monitoring and assessment, conservation, and enhancement of fen systems. Ouray County BOCC appreciates the clear and direct approach to recognizing the importance of fens, their special ecosystem services, and appropriate management approaches directed at the ground-water system vs. lumping these critical wetlands with those dominated by surface water hydrology.

- B. The language and management prescriptions for fens found in the May 2020 Rio Grand National Forest Land Use Plan should be incorporated with GMUG DRLMP FW-GDL-RMGD-13 into a clear ground-water dependent ecosystem section above the riparian management zone section will help assure us that complexity and importance of fens as peat accumulators are recognized by GMUG beyond valley riparian systems and will be appropriately managed. GMUG simply provides a guideline, while Rio Grande NF provides a clear standard that it will not authorize that alter fen hydrology.⁷

Rio Grande LMP⁸:

Groundwater-Dependent Ecosystems (GDE)

Groundwater-dependent ecosystems are a vital component for the natural environment and can include fens, wetlands, seeps, springs, riparian areas, groundwater-fed streams and lakes, and aquifers. These are present throughout the Forest and vary in size and timing. These areas provide an important ecosystem component and provide later-season flows with cold water temperatures, help sustain the function of surface and subsurface aquatic ecosystems, and provide habitat important to the persistence of plant species of conservation concern.

Areas that retain moisture and associated vegetation types have long been recognized as important for both ecosystem function and human benefits. Riparian areas and groundwater-dependent ecosystems such as wetlands, springs, aquifers, and fens provide ecosystem services that are necessary for the long-term health and well-being of both aquatic and upland areas.

Services provided by these areas are vital to the water supplies of downstream users. Services include stabilizing streambanks and reducing erosion, mitigating the impacts of floods, improving water quality by trapping sediment and other pollutants, and sustaining late season base flows. These areas are also vital to a wide variety of plants and animals. Aquatic and terrestrial species depend on the forage and cover provided in these habitat types, and many rare plants occur only in these ecosystems.

Management Approaches

Principal strategies and program priorities to protect groundwater-dependent resources

Fens and watershed conditions that support healthy fens provide irreplaceable ecological functions. The Forest continues to inventory and evaluate fens, thereby enabling managers to maintain healthy watersheds and aquatic resources.

The Forest continues to work with other agencies and adjacent landowners in the conservation of groundwater-dependent ecosystems.

Desired Conditions

⁷ Page 29 of the GMUG May 2021 DRLMP: "FW-GDL-RMGD-13: To maintain ecological integrity and support native species (including at-risk species), design projects to avoid physical or chemical alteration of springs, fens and wetlands (e.g., ditching, damming, dewatering, dredging, filling, flooding, nutrient loading and changes to pH)."

⁸ USDA USFS. (May 2020). *Rio Grande National Forest Land Management Plan*. [Plan and EIS]. Retrieved July 5, 2021, from <https://www.fs.usda.gov/main/riogrande/landmanagement/planning#:~:text=These%20plans%20guide%20the%20direction%20of%20specific%20projects,Forest%20for%20the%20next%2010%20to%2015%20years>; PDF. Plan pages 45 and 46.

DC-GDE-1: Identified groundwater-dependent ecosystems provide habitat for species of conservation concern and other native species. **Fens continue to accumulate peat.** (Forestwide)

Standards

S-GDE-1: **Do not authorize management actions that alter the hydrology of groundwater-dependent habitat features.** (Forestwide)

Guidelines

G-GDE-1: To **maintain ecosystem diversity and function, design projects to avoid or mitigate negative impacts to the ecological services that groundwater-dependent ecosystems provide.** (Forestwide)

7. **Existing designated wilderness is downgraded from primitive to semi-primitive ROS in the current DRLMP agency's preferred alternative B.**
 - A. The agency's preferred alternative B does not place existing designated wilderness in the Primitive ROS. Alternative D does have existing wilderness, the Baldy Colorado Roadless Area/proposed Baldy Addition to the Uncompahgre Wilderness, and the proposed Bear Creek Addition to the Uncompahgre Wilderness as Primitive ROS. **The Alternative D ROS should be incorporated into the agency's preferred alternative for existing Wilderness.** Wilderness areas are our most primitive areas and should remain primitive.
 - B. The agency's preferred alternative B also does not keep proposed CORE Act/San Juan Wilderness Act Addition parcels known as Whitehouse Mountain East and Whitehouse Mountain West as Primitive ROS. **The Alternative D ROS should be incorporated into the agency's preferred alternative for the proposed CORE Act/San Juan Wilderness Act Addition parcels – Whitehouse Mountain East and Whitehouse Mountain West.**
 - C. As part of the same downward pattern, the agency's preferred alternative seeks to move Hayden and Abrams areas into the General Forest MA instead of continuing to manage as semi-primitive non-motorized, which we disagree with and discussed above.

8. **The GMUG DRLMP preferred alternative and content organization reflects too much of an emphasis on human-centered roles, vision, and values while failing to recognize the intrinsic value of functioning ecosystems as providing ecosystem services independent of human commodity use.**
 - A. GMUG's DRLMP distills its distinctive roles into "Public Enjoyment" and "Commodity Use and Community Connections." This is important because these statements create the basis for the desired conditions and the lumping of the required 2012 Planning Rule topics in the plan. This may be why the agency's preferred alternative B reflects the Timber Suitability of Alternative C rather than a balanced hybrid of Alternatives D and C.
 - B. In contrast, the Rio Grande LMP adds three goals to its strategic framework that balance the forest as a resource to humans and its intrinsic value to native ecosystems, watershed health, and as a buffer for climate change through carbon sequestration: "Maintain and restore sustainable, resilient terrestrial ecosystems," "Protect and restore watershed health, water resources, aquatic ecosystems, and the systems that rely on them," and "Actively contribute to social and economic sustainability in the broader landscape and connect citizens to the land."
 - C. The organization of the GMUG DRLMP, which puts ecosystem services into multiple uses, reflects the idea that the forest's distinctive roles are transactional. Moving Ecosystem Services with Ecological Sustainability would be more appropriate. Sustainable, resilient, and high-functioning

ecosystems provide ecosystem services with current and future intrinsic benefits to all species. The 2012 Planning Rule also emphasizes "Sustainable Recreation" as a required topic.

- D. The GMUG DRLMP should review comments received through the scoping process on distinctive roles of the forest and add goals (allowed by the 2012 Planning Rule) reflecting the desires articulated for watershed health, soil health, forest health, ecological sustainability, and resiliency as our climate changes.**

9. Collaborative planning for future designated dispersed campgrounds and trails.

- A. While outside of the DRLMP, we include this topic because it may be relevant for the ROS. The BOCC supports collaborative scoping and planning processes to identify sustainable trail opportunities that mitigate and minimize conflicts. We desire designated dispersed camping opportunities that will provide adequate sanitation and parking while avoiding recreational resource damage. We are excited about the award of a Regional Outdoor Partnership grant to work collaboratively with stakeholders and the Ouray Ranger District.
- B. Specific to the RAT-COPMOBA proposal, we support concepts examined where proposed new trails do not cross private property without permission, avoid existing Wilderness or the proposed Whitehouse East, Whitehouse West, Baldy, and Bear Creek Addition parcels. We could support trails in the Ironton area if they exclude e-bikes. Our concern is that multi-modal trails must be sustainable for the speeds, payloads, and turning radii of mechanized bikes if allowed, and trails may not be possible if they must meet those standards. E-bikes can degrade our existing trails and create resource damage. We can support trails in the Cimarron area. If they are located in Gunnison County, like the conceptual Silverjack Climb and Traverse routes, there should be a collaboration with Gunnison County stakeholders. The proposed summer ROS in the GMUG DRLMP Alternative D is semi-primitive non-motorized (SPNM) in these areas.
- C. Overall, the Alternative D ROS should be incorporated into the agency's preferred alternative within the Ouray Ranger District.**

10. Definition of e-bikes, motor-assisted pedal bikes, and mechanized travel is needed.

- A. **We request that GMUG define or classify e-bikes, motor-assisted pedal bikes, and human-only powered mechanized travel so that we have the correct analysis of affected environments and ecosystems in the final alternative and EIS.**

11. Coordination with federally recognized Indian Tribes is needed.

- A. The 2012 Planning Rule (36 CFR 219.4(b)(1-2)) requires the responsible official to coordinate land management planning with, and review the planning and land use policies of, federally recognized Indian Tribes, other Federal agencies, and State and local governments, where relevant to the plan area. **We request that GMUG outreach to Tribes using the Colorado Commission of Indian Affairs and the Bureau of Indian Affairs, and continue to directly contact tribal leadership.** We are ready and willing to assist with connecting with the Tribes.

Through this cooperating agency DRLMP review process, we understand that the agency's preferred Alternative B is intended to be replaced with elements of Alternative C and D based on further analysis. Our comments in this letter and a letter jointly submitted by Ouray, Gunnison, Hinsdale, and San Miguel Counties reflect our

recommendation for the GMUG to refine Alternative D into a revised agency preferred alternative. This effort should be made before releasing a DRLMP and DEIS to the general public in order to improve the DRLMP and gain broader acceptance.

Respectfully submitted,


Ben Tisdel, Chair


Lynn M. Pudgett, Vice-Chair


Jake Niece, Member

Attachments:

1. Bear Creek Addition to Uncompahgre Wilderness fact sheet prepared by Community Conservation Proposal, updated 2020.
2. Baldy Addition to Uncompahgre Wilderness fact sheet prepared by Community Conservation Proposal, updated 2020.
3. Hayden fact sheet prepared by Community Conservation Proposal, updated 2019.
4. Abrams fact sheet prepared by Community Conservation Proposal.
5. Ouray County BOCC GIS shapefile (.shp) of Bear Creek Wilderness Addition parcel boundary unanimously supported by the BOCC.
6. Ouray County BOCC GIS shapefile (.shp) of modified Baldy Wilderness Addition parcel boundary unanimously supported by the BOCC.
7. Ouray County BOCC GIS shapefile (.shp) of Hayden and Abrams parcel boundaries discussed in this document.

cc. John Whitney, Western Slope Regional Director, U.S. Senator Michael F. Bennet; Helen Katich, Southwest Regional Representative, U.S. Senator John Hickenlooper