



USDA Forest Service,
Rocky Mountain Region,
Attn: Frank Beum, Reviewing Officer,
C/O Director of Strategic Planning, 2nd floor,
1617 Cole Blvd. Building 17,
Lakewood, CO 80401
submitted electronically to http://www.fs.usda.gov/goto/gmug/forestplan_objections

October 20, 2023

Thank you for the opportunity to object to the GMUG National Forest Plan and FEIS. Please accept this objection on behalf of Great Old Broads for Wilderness (Broads) - Northern San Juan chapter - who has been engaged in this plan revision process since Scoping. In addition, please include this objection with the objection filed by Rocky Smith et al. on behalf of the conservation coalition that submitted the Community Conservation Proposal and other comments throughout the NEPA process.

Since this objection letter is specific to designations, Broads thanks you for finding Bear Creek and Cow Creek and its tributaries eligible for Wild and Scenic River classification.

THE EVALUATION OF BEAR CREEK AS RECOMMENDED WILDERNESS (ADDITION TO THE EXISTING UNCOMPAHGRE WILDERNESS) IS INADEQUATE AND UNDERVALUES THE WILDERNESS CHARACTERISTICS OF THE LANDSCAPE.

Objector raised this issue in our comments (on the draft plan) dated November 23, 2021 beginning on page 2 "Bear Creek Watershed Recommended Wilderness." Northern San Juan chapter of Great Old Broads for Wilderness (Broads,) also commented on Bear Creek during scoping (June 1, 2018) and during the working draft comment period (June 28, 2019) as well as contributing to the Community Conservation Proposal (CCP.)

A. INTRODUCTION/BACKGROUND INFORMATION. Broads, in collaboration with the conservation coalition which submitted the Community Conservation Proposal during the Wilderness Inventory process (Chapter 70,) recommended four landscapes for protection in Ouray County - two recommended wilderness additions to the Uncompahgre Wilderness -Bear Creek and Baldy- and two special interest areas - Hayden Mountain and Abrams Mountain/

Brown Mountain. None of these landscapes was afforded these proposed protective classifications in the preferred alternative. However, Baldy (called High Mesa/Baldy by GMUG) was categorized as a Wildlife Management Area (WMA) in the preferred alternative. The objector finds it notable that the High Mesa/Baldy WMA is the ONLY Roadless Area (RA) of the four landscapes which is one reason the history below is significant in the objection review. Per the history below, Bear Creek and Hayden Mountain were never inventoried during any roadless area analysis dating back to the 1970s and including the Colorado Roadless Area inventory. (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5365960.pdf)

91% of recommended wilderness in the preferred alternative overlap with RAs (ROD page 18) and 56.3 % of acreage classified as WMAs in the preferred alternative overlap partially or totally with RAs. (Volume 1, Chapter 2, Table 6, page 76.) In addition, by analyzing the GIS database and excluding Fossil Ridge SRA, objectors determined that 36 of the 56 WMAs (64.3%) in the preferred alternative overlap partially or totally with RAs. Given these metrics, it appears that identification as a RA was significant in the review and selection of recommended wilderness designations and WMAs. Perhaps Bear Creek and Hayden Mountain did not receive the same scrutiny as landscapes classified as RAs.

Between the City of Ouray and Red Mountain Pass, along the spectacular scenic Million Dollar Highway (aka Highway 550,) the preferred alternative provides no protective classifications for this region that offers valuable wildlife habitat, extraordinary recreation opportunities including hunting, and according to the forest plan, High Scenic Integrity Objectives. (SIO preferred alternative map.) This stretch of road is a section of The San Juan Skyway Scenic and Historic Byway, which was designated as a National Forest Scenic Byway in September 1988, later named a Colorado Scenic and Historic Byway in 1989 and then an All-American Road in September 1996. Clearly, this view shed warrants a classification other than General Forest.

Some history of this landscapes - particularly perhaps why the Bear Creek basin and Hayden Mountain (both located in Ouray County) are not Colorado Roadless Areas - is worthy of consideration. This account was obtained from Mark Pearson via personal communication in February 2018. ¹

“Essentially all of the Colorado Roadless Areas track directly back to the 1970s era Forest Service Roadless Area Review and Evaluation (RARE) processes. There are very few if any roadless areas designated in the Colorado Roadless Rule that were not first identified in the 1970s. But during the second RARE process that ended in 1979 (RARE II), the Uncompahgre Primitive Area still existed and because it encompassed all of the area from basically Uncompahgre Peak on the east to Mount Sneffels on the west, and straddled Highway 550,

¹ Mark Pearson is the co-author (with John Fielder) of *The Complete Guide to Colorado's Wilderness Areas* and *Colorado's Canyon Country: A Guide to Hiking and Floating BLM Wildlands* and has spent a lifetime exploring and advocating for public lands and waters including authoring the Citizens Plan for the Wild San Juans that was finalized in 1999.

nothing within it was inventoried as a roadless area in 1979, and hence nothing ever carried through into subsequent inventories.

“To go back further in time, in 1929 the Forest Service created its system of primitive areas, which was an attempt to highlight areas with scenic and recreational appeal, but did not have any teeth in terms of prohibiting development. The Uncompahgre Primitive Area was created in about 1932 by an administrative decision.

"Then in 1939, the Forest Service created a new set of regulations that are very similar to wilderness today, and those banned new roads, logging, etc. The direction to agency managers was to go through all of the then existing primitive areas and recategorize those into so-called "wilderness areas," which was an administrative term. However, with the advent of World War II in the 1940s, progress was slow and the task not completed, so the Uncompahgre Primitive Area was not recategorized.

“In 1964, when the Wilderness Act was passed, all of the reclassified "wilderness areas" were instantly designated as Wilderness by Congress -- this included only 5 areas in Colorado. The Uncompahgre Primitive Area had not yet been reviewed or reclassified, so it was left hanging as a Primitive Area.

“The Wilderness Act directed the Forest Service to study and make recommendations for the remnant primitive areas. The Uncompahgre Primitive Area study was completed in 1974 (https://www.fs.usda.gov/land/staff/lar/LAR-documents/LAR_1974.pdf page 37) but Congress took no action to designate wilderness.

“When RARE II was conducted by the Forest Service in the late 1970s, the landscape that included Bear Creek and Hayden Mountain was still within the original primitive area boundary (but not proposed for wilderness into the Uncompahgre Wilderness -- then called Big Blue). RARE II only applied to lands not under study at that time, not the primitive areas, so Bear Creek and Hayden Mountain never showed up as independent areas.

“In the 1980 Colorado Wilderness Act, Uncompahgre (Big Blue) was designated wilderness by Congress and the Uncompahgre Primitive Area was dissolved. But by then, the die was cast in terms of what was considered roadless and because Bear Creek and Hayden Mountain were not in the roll call of RARE II roadless areas, they were overlooked and not analyzed during succeeding years, in particular, during the 2012 Colorado Roadless Rule.”

B. THE HISTORY DESCRIBED ABOVE JUSTIFIES CCP’S BEAR CREEK BEING CONSIDERED FOR RECOMMENDED WILDERNESS. Given:

- the fact that landscapes in the Uncompahgre Primitive Area (including Bear Creek) were overlooked at various stages of analysis for protected status as roadless and wilderness;
- that the USFS Land Area Report of 1974 on page 35 (https://www.fs.usda.gov/land/staff/lar/LAR-documents/LAR_1974.pdf) clearly states “The Wilderness Act (P.L. 88-577) also

directed that the 23 National Forest Primitive Areas be managed to maintain their primitive character until the Secretary of Agriculture has presented recommendations to the President and to Congress as to their suitability or non-suitability for Wilderness and Congress has acted on these recommendations;” and

- that Bear Creek was not even inventoried (and therefore not classified as a Roadless Area) in the 2012 Colorado Roadless Rule (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5365960.pdf) when clearly it qualifies as roadless;

therefore, the revised GMUG Forest Plan constitutes a unique opportunity to rectify these omissions in history and classify Bear Creek as proposed in the CCP as recommended wilderness or at a minimum to classify it as a Special Interest Area or Special Management Area. This objection urges the GMUG to seize this opportunity to protect this landscape so important to wildlife, recreation, scenery, and Ouray County.

C. INHOLDINGS HAVE BEEN ACQUIRED AND TRANSFERRED TO THE USFS.

In addition to the history detailed above, it is significant that prior to the 21st century, the Bear Creek watershed and surrounding areas (included in the CCP proposal) were riddled with private mining claims. Starting in 2002, the non-profit Red Mountain Project purchased nearly 30 mining claims in and around the Bear Creek drainage using Land & Water Conservation Fund (LWCF) dollars and transferred these mining claims to the USFS. (Personal communication, Bob Risch, founder Red Mountain Project, October 12, 2023.) The Bear Creek NRT, in fact, crosses nine of these transferred mining claims. As a result, what might have been an issue of concern related to private inholding in previous analyses, is no longer relevant to the Bear Creek area, as defined by CPP boundaries.

D. BEAR CREEK MEETS THE CRITERIA FOR RECOMMENDED WILDERNESS USED IN THE ROD.

The Record of Decision (page 18) explains the rationale for the selection of recommended wilderness landscapes in the preferred alternative as follows:

“Each of the recommended areas is adjacent to existing congressionally designated Wilderness areas. Most of the recommended areas (91%) overlap with Colorado Roadless Areas, and more than half of that (57%, or 26,400 acres) overlaps with the more restrictive classification of Upper-Tier Colorado Roadless Areas. Both the proximity to existing congressionally designated Wilderness and present management as non-Upper-Tier and Upper-Tier Roadless Areas would facilitate the administrative transition of these recommended areas into the National Wilderness Preservation System, if subsequently designated by Congress. ... The recommended areas in the preferred alternative rated high or moderate for wilderness characteristics in our wilderness inventory and evaluation. In all phases of the plan revision, much of the public communicated high support for these areas to be managed as Recommended Wilderness.”

Be it so noted:

1. The CCP proposed Bear Creek recommended wilderness is adjacent to the existing Uncompahgre Wilderness.

2. Though no one can know what might have been decided had the Uncompahgre Primitive Area been analyzed during either RARE or RARE II, and/or had the landscape been analyzed in the 2012 Colorado Roadless Rule, the fact remains that Bear Creek within the CCP boundaries contains no roads. Given its wilderness characteristics and identification as “primitive” in the historic record, there exists a high likelihood that Bear Creek would have been identified as a roadless area. Given that the ROD states 91% of the recommended wilderness areas in the preferred alternative overlap with Colorado Roadless Areas (CRA,) Bear Creek may have been given greater attention during the Wilderness Inventory process had it been an identified CRA. For example, nearby Baldy Roadless Area is a Wildlife Management Area in the preferred alternative.
3. Amphitheatre polygon (03) received a rating of moderate during the Wilderness Inventory and that analysis was conducted on a larger landscape that included areas with less wilderness characteristics than the landscape proposed by CCP. (See J. below.)
4. Bear Creek recommended wilderness is supported by Ouray County, Town of Ridgway, several local non-profits, businesses and over 60 local residents who submitted comments during the draft comment period. (See GMUG reading room webpage and sections M. and N. below.)

Therefore Bear Creek as proposed in the CCP meets the qualifications (with some speculation related to the roadless/wilderness) for every criteria mentioned in the ROD. This reality only further evinces our argument that Bear Creek is worthy of classification as recommended wilderness in the preferred alternative.

E. BEAR CREEK QUALIFIES FOR WILDERNESS, AND MANAGEABILITY CAN BE ADDRESSED. As per our previous comments, Bear Creek meets or exceeds the characteristics necessary to qualify as recommended wilderness:

- greater than 5000 acres or an addition to an existing wilderness - Bear Creek is recommended as an addition to the Uncompahgre Wilderness and encompasses nearly 6,000 acres.
- naturalness - The vast majority of the watershed and surrounding landscape recommended for wilderness is in its natural state with the exception of two historic mine sites along the Bear Creek National Recreation Trail (NRT) - Grizzly Bear and Yellowjacket Mines.
- opportunities for solitude or unconfined primitive recreation - The NRT is steep with significant exposure along many stretches limiting its use to the more adventurous hiker. Though the first 2.4 miles of the NRT to Grizzly Bear Mine receive moderate use during the summer months, the rest of the trail and definitely the landscape off trail afford exceptional opportunities for solitude. This objection argues that Bear Creek does not experience high use as indicated in the Plan (GMUG Forest Plan, appendix 3, page 6, Table 43.) The vast expanse of lands lacking any trails or improvements afford outstanding opportunities for unconfined primitive recreation as personally experienced by several of our members during citizen science bighorn sheep monitoring.
- manageability as wilderness - The FEIS in Volume 1 (chapter 3, page 658) references concerns regarding maintenance of the NRT potentially requiring the use of motorized tools

and the Hardrock 100 Race - an annual competitive foot race (incompatible with wilderness) whose race course uses the 7.1 miles of S. Fork Bear Creek and Bear Creek Trails between Engineer Pass and Highway 550.

Objector recommend cherry-stemming a short portion of the NRT east from the CCP boundary approximately a half mile to the Grizzly Mine in order to address the need for motorized tools, thereby excluding this short section of trail from the recommended wilderness area.

Objector also recommends rerouting the Hardrock 100 based upon the following two options:

1.) From the Grouse Gulch trail intersection with CR 2 travel to California Gulch (rather than to Engineer Pass) (~2 mi) then to Hurricane Pass (4.4 mi) to Vernon Mine (2.3 mi) and drop into Ironton Park via Gray Copper Trail (2.2). From Ironton, the course would cross Hwy 550 and head north along the Mears Road (west of Ironton Fen and Crystal Lake) (2 mi) to the Hayden Trail to CR 361/Campbird Rd (5.6 mi) where it would meet up with the original race course for a total of ~18.5 miles.

2.) An alternative route would travel from the Grouse Gulch trail intersection with CR 2 to the 4WD road south of Treasure Mountain and north of Picayne Gulch to the trail for Hanson Peak (~5 mi) to the intersection with the Hurricane Pass Road (~2.5 mi) to Vernon Mine (2.3 mi) and drop into Ironton Park via Gray Copper Trail (2.2 mi). Then the course would cross Hwy 550 and head north along the Mears Road (west of Ironton Fen and Crystal Lake) (2 mi) to the Hayden Trail to CR 361/Camp Bird Rd (5.6 mi) where it would meet up with the original race course for a total of ~19.6 miles.

The current race course is approximately 17.9 miles from Grouse Gulch trail intersection with CR 2 to the city of Ouray.

There is some precedence for rerouting endurance race courses when the original race course is incompatible with a revised federal agency plan or Congressionally designated wilderness.

(<https://www.irunfar.com/a-trail-runners-primer-on-public-lands>)

Figure 3. Trail Races & Ultramarathons Affected by Federal Policy

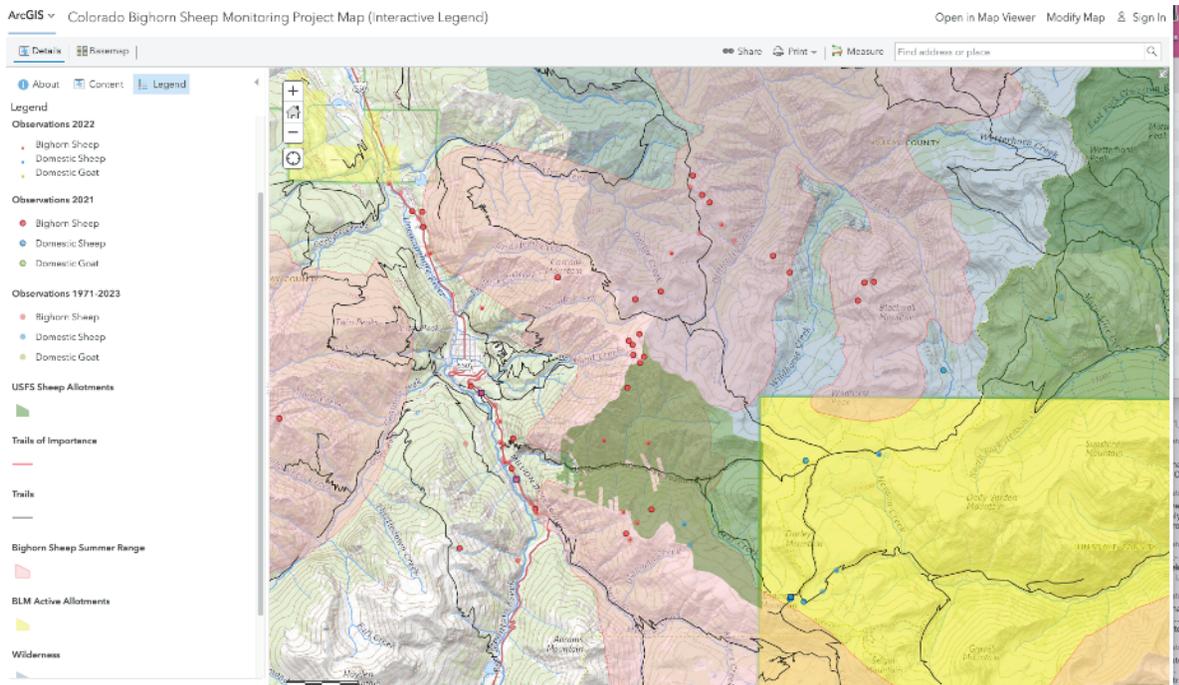
Race	Agency	Reason for Action	Result
Angeles Crest 100 Mile Endurance Run	USFS	Pleasant View Ridge Wilderness Area	Course rerouted in 2016 because of wilderness area.
Badwater Ultramarathon	USFS	John Muir Wilderness Area	Course shortened to finish at Whitney Portal instead of Mt. Whitney summit because of wilderness area.
Badwater Ultramarathon	NPS	Death Valley National Park safety review	Event suspended within park boundaries in 2014 pending safety review.
Las Vegas Red Rock Fat Ass	BLM	La Madre Mountain Wilderness Area	Event permitted and course rerouted around wilderness in 2010.
Western States 100 Mile Endurance Run	USFS	Granite Chief Wilderness Area	Participants capped at 369 in 1988.
Timberline Trail Marathon	USFS	Mt. Hood Wilderness Area	Course rerouted in 2009 because of wilderness area.
La Luz Trail Run	USFS	Sandia Mountains Wilderness Area	Cap on participant numbers (400) to lessen impact on wilderness area. [Permit denied starting in 2021]
Kilauea Volcano Runs	NPS	Hawaii Volcanoes Wilderness Area & area's cultural significance to native Hawaiians	Event cancelled after 2008 because of wilderness-area designation and area's cultural significance.
49er Double Marathon	NPS	Phillip Burton Wilderness Area	Event cancelled because of wilderness area. <i>Miwok 100k</i> created on alternate course as a result.
Hardrock Hundred Endurance Run	BLM	Handies Peak Wilderness Study Area	Environmental Assessment (EA) completed to approve a multi-year Special Recreation Permit.

No doubt such changes pose challenges, and federal agencies and race directors and participants must weigh the costs and benefits of protecting lands exhibiting wilderness characteristics. Our organization supports natural resource protection over recreation - especially with regards to one race that takes place annually for a permitted duration of 48 hours.

F. THE VIA FERRATA DOES NOT EFFECT WILDERNESS CHARACTERISTICS. The FEIS in Volume 1 (chapter 3, page 658) also references concerns regarding the via ferrata and shuttle services that detract from wilderness characteristics. The Gold Mountain Via Ferrata is accessed from Highway 550 and climbs to an elevation of approximately 9100 ft. ending on private property. The boundary proposed by the CCP above this private land lies at over 10,500 and is not in proximity to the via ferrata. Nor does this recreation use negatively impact the wilderness characteristics of the landscape recommended for wilderness by the CCP. Any shuttle service for the via ferrata is confined to Highway 550, county roads and/or private roads and is irrelevant to the proposed recommended wilderness.

G. BEAR CREEK POSSESSES SIGNIFICANT WILDLIFE, SCENIC AND RECREATION VALUES. The Bear Creek National Recreation Trail speaks for itself in terms of scenic and recreation values and this objector has hiked every trail in the region (and within the CCP-proposed boundaries) multiple times and extensively off trail and can personally attest to these values. Furthermore, this region has important wildlife values as detailed in our previous comments. Objectors agree with the GMUG that this region is important habitat for bighorn

sheep, elk, mule deer, bear, pika and raptors. Notably the area is bighorn winter and summer range and reproduction area including an important seasonal migration corridor. The Bear Creek area suggested for recommended wilderness by the Community Conservation Proposal is important habitat for the Tier 1 S-21 bighorn sheep herd. The map below from [Mountain Studies Institute Bighorn Monitoring Project](#) website is indicative of the many sightings of bighorn across this landscape over the four seasons. Red points indicate an observation of one or more individuals.



H. BEAR CREEK AREA POSSESSES BOTANICAL VALUES. The Colorado Natural Heritage Program (CNHP) Dexter Creek Potential Conservation Area (Moderate Biodiversity Significance) lies within the Bear Creek recommended wilderness, and CNHP has documented 2 occurrences of the state imperiled plant *Monardella odoratissima* (Mountain wild mint) G4/G5 S2 (D ranked) in the area. Note: one of our members personally updated this record on 7/28/2022.

I. THE BEAR CREEK AREA HAS HISTORICAL RESOURCES. New information, gleaned by the objector on August 31, 2022, identifies several occurrences of arborglyphs along the Bear Creek Trail approximately 3.2 miles from the trailhead at Highway 550 providing additional cultural resource values to this landscape.



J. BEAR CREEK HAS TRIBAL IMPORTANCE. The CCP-proposed Bear Creek recommended wilderness lies within the Brunot Cession Area providing valuable hunting and fishing rights to the Ute People. In addition, new information since Broads' draft comments reveal archeological evidence of Indigenous presence and activity in the watershed. The stone tool below was photographed by the objector on August 23, 2022 in the upper Bear Creek watershed.



K. BOUNDARY ADJUSTMENT WARRANTS A NEW INVENTORY . The objector requested that the original boundaries of polygon 03 Amphitheatre (8,598 acres) analyzed in the wilderness inventory (and rated as moderate) be modified and the polygon reduced to less than 6,000 acres to include its wildest, more remote landscapes, eliminating acreage along Highway 550 and the southern acres adjacent to Engineer Road. Though Volume 1 (chapter 3, page 657) of the FEIS references the acreage of polygon 03 Amphitheatre/Bear Creek as 5,938 acres in Alternative D, there is no indication that any re-evaluation of wilderness characteristics within this smaller, more pristine polygon was undertaken. Therefore, it appears the original inventory (and lower rating) is not applicable to the smaller polygon and this objection strongly recommends the GMUG revisit the inventory of the smaller landscape in consideration of wilderness characteristics.

L. THE BEAR CREEK LANDSCAPE AS PROPOSED IN THE CCP WARRANTS RECOMMENDED WILDERNESS CLASSIFICATION IN ADDITION TO BEAR CREEK'S ELIGIBILITY FOR WILD AND SCENIC RIVERS. Bear Creek, found eligible for Wild and Scenic Rivers with Wild and Recreational preliminary classifications as well as Geology, Scenery, and Recreation Outstanding Remarkable Values, (Forest Plan, Appendix 11, pages 21-22) is duly noted and celebrated. This classification of Wild is further evidence of the wilderness values found in the watershed. The Wild and Scenic Rivers Act of 1968 states in reference to river segments with the Wild classification, "These represent vestiges of primitive America." (page 907.) The Plan uses descriptors such as, "...exemplary scenery throughout the entire eligible segment..." "towering mountain walls, and deeply incised stream channel are punctuated by numerous cascades and waterfalls..." and "...rugged and remote characteristics." This objection argues that these scenic, rugged, and remote qualities apply to the entire landscape proposed in the CCP. However, protection afforded by Wild and Scenic eligibility only

encompasses the waterway and a limited acreage along its banks. This objection argues that the surrounding watershed is also worthy of protection as recommended wilderness.

M. COUNTY AND TOWN SUPPORT WILDERNESS DESIGNATION. Ouray County and the Town of Ridgway support Bear Creek area as recommended wilderness with a minor boundary adjustment. (See letters from County and Town dated November 26, 2021 and November 23, 2021 respectively.) Frequently the USFS indicates County support is essential for consideration of designations, and this objection urges the GMUG to give these endorsements from elected bodies the attention they deserve.

N. ADDITIONAL ENDORSEMENTS. The proposed Bear Creek addition to the Uncompahgre Wilderness also received the following endorsements from local and regional organizations:

- Ouray Backcountry Alliance - recommended wilderness (November 26, 2021)
- Ouray Climbers Alliance - recommended wilderness (November 25, 2021)
- Ouray Trail Group - Special Management Area (November 23, 2021)
- 140 Business supporters for the CCP (gmugrevision.com)

REFERENCES

https://www.fs.usda.gov/land/staff/lar/LAR-documents/LAR_1974.pdf

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5365960.pdf

<https://ocs.fortlewis.edu/redmountainproject/default.asp>

<https://www.gmugrevision.com>

<https://www.hardrock100.com/hardrock-course.php>

<https://www.irunfar.com/a-trail-runners-primer-on-public-lands>

<https://www.goldmountainranch.com/gold-mountain-via-ferrata>

<https://basecampouray.com/gold-mountain-ranch/#gmr-virtual>

<https://www.mountainstudies.org/bighorn>

<https://www.arcgis.com/home/webmap/viewer.html?webmap=a759f5243ea54d798ca50048bcd58d7c&extent=-111.571,36.8515,-100.8043,40.8454>

https://cnhp.colostate.edu/download/documents/pca/L4_PCA-Dexter%20Creek_10-28-2022.pdf

<https://www.rivers.gov/sites/rivers/files/2022-10/Public%20Law%2090-542.pdf>

CONCLUSION

Given the significant wilderness characteristics within the CCP's proposed Bear Creek recommended wilderness, its numerous outstanding wildlife, scenic, recreation, geologic, botanical and other values and its cultural and historic resources, the Bear Creek landscape deserves greater protection than afforded by the General Forest category in the preferred alternative. The identification in the preferred alternative of Bear Creek as eligible for Wild and Scenic River designation with the highest preliminary classification of Wild further evinces the wildness of the region. Furthermore, the history of the Uncompahgre Primitive Area coupled with Bear Creek not being inventoried during the 2012 Colorado Roadless Rule analysis evinces the fact that Bear Creek has been overlooked in multiple inventories. The ability to reroute the Hardrock 100 Race, address the need to adequately maintain the NRT with a short cherry stem, and dispel, based upon data, the other concerns identified by the planning team noted above, this plan revision process constitutes a critical opportunity to elevate protection for the Bear Creek watershed and contiguous lands adjacent to the existing Uncompahgre Wilderness. The endorsement from local elected officials and numerous non-profit organizations mentioned above is further evidence of the support, urgency and need for the GMUG to reconsider Bear Creek as described by the CCP for protected status in the preferred alternative as recommended wilderness.

SUGGESTED REMEDIES:

Designate Bear Creek as recommended wilderness in the final forest plan and reroute the Hardrock 100 race. Cherry stem the National Recreation Trail approximately one-half (0.5) miles from the western CCP boundary in order to allow for the use of power tools to maintain this stretch of trail.

OR

Designate Bear Creek as a Special Interest Area or Special Management Area that is managed to protect its wildlife, scenic and other values with two exceptions:

1. Permit the Hardrock 100 Race to use the S. Fork Bear Creek and Bear Creek Trails from Engineer Pass to Highway 550 for the annual footrace and

2. Allow motorized tools to be used from the proposed Bear Creek recommended wilderness western boundary along the subsequent approximately half mile of the Bear Creek in order to maintain a safe and sustainable NRT.

THE CATEGORIZATION OF HAYDEN MOUNTAIN AS GENERAL FOREST IS INADEQUATE TO PROTECT THE WILDLIFE, SCENIC AND OTHER NATURAL VALUES OF THE LANDSCAPE AND SHOULD BE CHANGED TO SPECIAL INTEREST AREA OR SPECIAL MANAGEMENT AREA.

Objector raised this issue in our comments (on the draft plan) dated November 23, 2021 beginning on page 3 “Hayden Mountain Special Interest Area (SIA.)” Broads also commented on Hayden Mountain SIA during scoping (June 1, 2018) and during the working draft comment period (June 28, 2019) as well as contributing to the Community Conservation Proposal (CCP.) Note the plan and FEIS identify our proposal as a Special Management Area (SMA.)

A. INTRODUCTION/BACKGROUND INFORMATION. See letter subsection A. above regarding Bear Creek recommended wilderness. The same history applies to Hayden Mountain as it was also part of the Uncompahgre Primitive Area. Hayden Mountain also flanks the western side of the San San Skyway Scenic and Historic Byway from the City of Ouray to Red Mountain Pass.

B. THE HAYDEN MOUNTAIN AREA NEEDS A PROTECTIVE CLASSIFICATION.
Given:

- the history detailed in the Introduction/Background information above,
- the fact that landscapes in the Uncompahgre Primitive Area (including Hayden Mountain) were overlooked at various stages of analysis for protected status as roadless and wilderness,
- that the USFS Land Area Report of 1974 on page 35 (https://www.fs.usda.gov/land/staff/lar/LAR-documents/LAR_1974.pdf) clearly states “The Wilderness Act (P.L. 88-577 also directed that the 23 National Forest Primitive Areas be managed to maintain their primitive character until the Secretary of Agriculture has presented recommendations to the President and to Congress as to their suitability or non-suitability for Wilderness and Congress has acted on these recommendations.” and
- that Hayden Mountain was not even inventoried (and therefore not classified as a Roadless Area) in the 2012 Colorado Roadless Rule when clearly it qualifies as roadless, (https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5365960.pdf) Note that the two roads leading to the Barstow and Greyhound Mines are excluded from the CCP Hayden Mountain SIA boundaries.

Therefore, the revised GMUG Forest Plan constitutes a unique opportunity to rectify these omissions in history and to classify Hayden Mountain as proposed in the CCP as a SIA or at a

minimum to classify it as a Wildlife Management Area (WMA.) This objection urges the GMUG to seize this opportunity to protect this landscape so important to wildlife, recreation, scenery, and Ouray County.

C. INHOLDINGS HAVE BEEN ACQUIRED AND TRANSFERRED TO THE USFS. It is also noteworthy in the history of the Hayden landscape that, since 2002, the non-profit Red Mountain Project has purchased hundreds of mining claims in the Red Mountain Mining District using Land & Water Conservation Fund (LWCF) dollars and transferred these mining claims to the USFS. Numerous purchases are located within the CCP-proposed Hayden Mountain SIA. As a result, what might have been an issue of concern related to private inholding in previous analyses, is no longer relevant to the Hayden Mountain area, as defined by CPP boundaries.

D. SUMMER ROS FOR THE ENTIRE CCP-PROPOSED HAYDEN MOUNTAIN SIA SHOULD BE SEMI-PRIMITIVE NON-MOTORIZED. Broads' vehemently objects to the Summer ROS of motorized from Spirit Gulch to McIntyre Gulch within the proposed SIA boundary. (See Summer ROS map.) The narrative for Hayden Mountain SIA in the CCP reads: "The motorized route up Commodore Gulch to the Barstow Mine and the jeep road to Greyhound Mine are also excluded from the proposed SIA as are the mine sites themselves. Locked gates at both access roads along highway 550 prevent motorized use by the public. The jeep road between these two mines and adjacent to Spirit Gulch is abandoned and undergoing natural revegetation. It is a valued hiking route and included within the proposed SIA." This objection recognizes that the private mining claims outside the proposed Hayden Mountain SIA have motorized access for their owners. Public motorized use should be prohibited to these claims and absolutely no motorized use by anyone should be allowed between the Barstow and Greyhound Mines.

E. THE HAYDEN MOUNTAIN AREA HAS SPECIAL AND IMPORTANT RESOURCES/CHARACTERISTICS. As per our previous comments, Hayden Mountain, at approximately 10,000 acres and spanning the west side of Highway 550 from Ouray CR 361 to Black Bear Road at Red Mountain Pass, has many qualities characteristic of wilderness, however avalanche mitigation and one permitted recreational use make the region incompatible with a wilderness recommendation, therefore Broads and the CCP proposed the next most protective designation - Special Interest Area. The wildlife, scenic, botanical, geological and cultural values are worthy of protection beyond the General Forest category as classified in the preferred alternative.

This vast landscape provides valuable wildlife habitat for Canada lynx, bighorn sheep, bear, elk, moose, deer, and cliff-nesting raptors among other species. In particular, we note the summer range for elk where our members regularly witness 60-70 cows with calves, the regular sighting of a small but growing population of moose, a unique observation of a Canada lynx individual, and the occurrence of the Tier 1 S-21 bighorn sheep herd in the southern portion of the polygon around Senator Beck Basin. The proposed Hayden SIA also affords a significant corridor for north-south migration providing connectivity between the San Juan National Forest and the

Weminuche Wilderness all the way to the Mount Sneffels Wilderness and the Uncompahgre Plateau. It also has value as linkage between the Uncompahgre Wilderness and the west side of Highway 550 and Mount Sneffels Wilderness as evinced by the occurrence of S-21 bighorn sheep throughout the region. Furthermore, Hayden provides for seasonal elevation movement for numerous species. At a time of diminishing global and regional biodiversity coupled with the threats of increased recreation impacts and climate change, the GMUG has both an opportunity and responsibility to protect this region for its species diversity, relatively unfragmented habitat, wildlife connectivity, and refugia potential.

F. THE HAYDEN MOUNTAIN AREA HAS HIGH BIODIVERSITY SIGNIFICANCE. In 2017, CNHP identified four Potential Conservation Areas in the surrounding region all with Very High Biodiversity Significance (Imogene Pass, Ironton Park, Mineral Basin, & Ouray Canyons.) CNHP has also reported the occurrence of three globally and/or state imperiled plants in the proposed SIA: New Mexican cliff fern (*Woodsia neomexicana*) G4/S2 (B ranked;) Western polypody (*Polypodium hesperium*) G5/S1S2 (B ranked;) and San Juan Draba (*Draba graminea*) G2/S2 (A ranked) as well as one plant association in the adjacent Ironton Fen identified as Dwarf birch/Sphagnum shrubland (*Betula glandulosa/Sphagnum*) G2/S2 (B ranked.) Note that the San Juan Draba is listed on the Regional Forester's SCC. (SCC List and Process Rationale, page 1.)

G. POTENTIAL RISKS IF PROTECTIVE CLASSIFICATION IS LACKING. Though the revised plan determines Hayden Mountain is not suitable for timber (see Timber Suitability map #4,) which is noted and celebrated, the potential for proliferation of trails across this landscape would potentially impair its high scenic integrity (See Scenic Integrity Objective map #4) and negatively impact wildlife habitat. Furthermore, the potential for mechanized use in the region would be deleterious to wildlife and wildlife corridors. Given the increasing popularity of snow bikes, species who reside in this area all winter such as Canada lynx, elk, moose and weasel/ermine, could experience stress at a critical time of year or even be forced out of their usual habitat.

H. HAYDEN MOUNTAIN AREA POSSESSES HISTORICAL AND CULTURAL RESOURCES. New information, gleaned by the objector identifies several occurrences of arborglyphs (October 7, 2022) and possibly a culturally modified tree (July 6, 2021) along the Full Moon route providing cultural resource values to this landscape.



I. HAYDEN MOUNTAIN HAS TRIBAL IMPORTANCE. The CCP-proposed Hayden Mountain SIA lies within the Brunot Cession Area providing valuable hunting and fishing rights to the Ute People. In addition, the objector is aware of acreage within this area where *Ligusticum porteri* (Osha) grows in abundance. Objective FW-OBJ-CHR-03 indicates the importance of this botanical species to Tribes while the possibility of culturally modified trees on this landscape aligns with objective FW-OBJ-CHR-02 (Plan, Chapter 2, page 59.)

J. LOCAL GOVERNMENT SUPPORT. Town of Ridgway supports Hayden Mountain as a Special Interest Area. (See letter dated November 23, 2021.)

K. ADDITIONAL ENDORSEMENTS. The proposed Hayden Mountain SIA received the following endorsements from local and regional organizations:

- Ouray Backcountry Alliance - SIA (November 26, 2021)
- Ouray Climbers Alliance - Special Management Area (November 25, 2021)
- Backcountry Hunters & Anglers - Wildlife Management Area (GMUG Wild Lands and Wildlife Report submitted to the GMUG in March 2021)
- Outdoor Alliance GMUG Vision - recommended wilderness (prior to CCP reclassification as an SIA) (August 1, 2019)
- 140 Business supporters for the CCP (gmugrevision.com)

REFERENCES

https://www.fs.usda.gov/land/staff/lar/LAR-documents/LAR_1974.pdf

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5365960.pdf

<https://ocs.fortlewis.edu/redmountainproject/default.asp>

<https://www.gmugrevision.com>

<https://cnhp.colostate.edu/projects/county-survey-reports/#Ouray>

https://www.backcountryhunters.org/grand_mesa_uncompahgre_gunnison_usfs_report

CONCLUSION

Given the significant wilderness characteristics within the CCP's proposed Hayden Mountain SIA, particularly its outstanding wildlife and scenic values, coupled with recreational, geologic and botanical values and cultural and historic resources, referenced above and in the CCP, the Hayden Mountain landscape deserves greater protection than afforded by the General Forest category in the preferred alternative. If not for the two incompatible existing uses, Hayden meets the criteria for wilderness. Furthermore, the history of the Uncompahgre Primitive Area in

addition to Hayden Mountain not being inventoried during the 2012 Colorado Roadless Rule analysis highlights the fact that Hayden Mountain has been overlooked in multiple analyses. This current plan revision process constitutes a critical opportunity to elevate protection for Hayden Mountain with its expansive wildlife habitat and stunning scenery. Protective status would also ensure preservation of the scenic view shed along the Highway 550 corridor - a popular section of the San Juan Skyway Scenic and Historic Byway. The endorsement from local elected officials and numerous non-profit organizations mentioned above is further evidence of the urgency and need for the GMUG to reconsider Hayden Mountain as described by the CCP for protected status as an SIA in the preferred alternative.

SUGGESTED REMEDIES

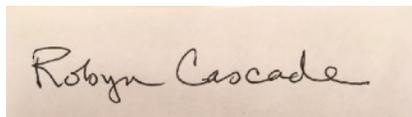
Designate Hayden Mountain, with boundaries consistent with the CCP, as a Special Interest Area or Special Management Area in the final forest plan. Within three years of plan adoption, develop a management plan that protects to protect the area's values.

OR

At a minimum, designate Hayden Mountain as a WMA to protect its wildlife values.

Thank you for your attention to these objections on behalf of Great Old Broads for Wilderness and submission in a separate document from Rocky Smith et al.

Sincerely,

A rectangular image showing a handwritten signature in cursive script that reads "Robyn Cascade". The signature is written in dark ink on a light-colored, slightly textured paper background.

Robyn Cascade
Northern San Juan Chapter
Great Old Broads for Wilderness
northernsanjuanbroadband@gmail.com