

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 online to <https://cara.fs2c.usda.gov/Public/CommentInput?project=51806>
October 30, 2023

Thank you for the opportunity to object to the GMUG National Forest Plan and FEIS. Please accept this objection on behalf of the Ouray Trail Group (OTG). The OTG original comment letter was submitted on 11/21/2021 by Steve Boyle, then-current OTG president. This objection letter is signed by current president Ames Risch.

OTG is a non-profit corporation of volunteers founded in 1986, dedicated to the preservation and safe public use of Ouray County's non-motorized trails. Our members take a stewardship role in protecting, preserving, and maintaining the natural and recreational resources we all enjoy. We appreciate the opportunity to be a part of the GMUG planning process, and we recognize the enormous amount of work that has been invested by the USFS in the plan. Our comments and objections focus on the plan components in and near Ouray County.

OTG does volunteer work on non-motorized trails in the Ouray Ranger District of the Uncompahgre National Forest, under a long-standing MOU and Volunteer Service Agreement with the Ouray Ranger District. We coordinate trail maintenance and sign work with USFS, publish a hiking guide, maintain a website, maintain trail registers, and organize trail workdays and training for our volunteers and school students. OTG volunteers recorded 2,654 hours on USFS-related work in 2021, and at least 1,000 additional hours on OTG administration, meetings, fundraising, map development and sales, trail reconnaissance, and other tasks that support OTG's mission. In addition, the Ouray County Nordic Council is a division of OTG.

Following are OTG's objections, first on the Timber Suitability map in Ouray County, and then organized by region within Ouray County:

1) Timber Suitability in Ouray County

OTG commented on the Draft Plan that the much-photographed aspen and spruce/fir forests are an important part of the economic health of Ouray County, as well as the enjoyment of local residents, and that timber harvest should not be allowed on slopes

>40%, or in the aspen and conifer forests along US550 as well as along the north side of the Sneffels Range. The Released Plan/EIS does state that the USFS fine-grained analysis did reduce the timber suitability, but OTG believes it needs to be further reduced in Ouray County. These forests are amazingly beautiful, and commercial timber harvest in these areas would unacceptably impact the hiking experience as well as the local tourism economy. The timber suitability maps along US550 show red patches even with the Scenic Byway overlay (0.5 mile on each side); timber harvest should not be allowed within the view shed of US550. There is also significant suitable timber harvest within view of the City of Ouray and its local trails – along the north slopes of Mt. Hayden, below Twin Peaks, and in the Amphitheater; OTG objects to all of this; in some cases it is on very steep slopes and in some cases it is just too visible. OTG also objects to the very significant timber suitability in the Whitehouse Core Act Wilderness Addition; these areas will mar the Sneffels scenic vistas from the north side.

OTG would also like to object to the timber suitability maps along US550 near Ironton because of the uniqueness and pristine quality of the iron fens, on both sides of the highway (both the Hayden side and the Abram side). Any timber harvest near and upstream of these fens would not be good for their health. The Ironton Iron Fens and wetlands would be sensitive to redirecting more metals-contaminated water into them. That extra load of metals could cause the system to go out of balance and start to degrade, not being able to handle more pollutants.

2) Bear Creek polygon O3a

This 6,000 acre parcel is discussed and listed as polygon O3a in the FEIS Part 1. OTG originally commented that we wished this parcel could be recognized as a Special Management Area (SMA), emphasizing non-motorized recreation and protection of natural scenic values. We appreciate that Bear Creek was made a Wild and Scenic River (with 0.5 mile wide protective swath) and that the spectacular Bear Creek National Recreation Trail was mapped with a 1.0 mile wide protective swath. However we feel that the USFS's General Forest designation in the Released Management Plan does not protect that very unique area as strongly as is needed. The FEIS states that solitude is affected by the highway that this parcel overlooks, but that is very misleading – the initial 0.5 mile of the trail traverses very steeply up rock cliffs, and once you are above that it is indeed one of the most solitary and quiet areas in Ouray County because it is very hard to get up there. As a result of the solitude it is also one of the areas which bighorn sheep frequent in the summer. In the winter the bighorns move down and are frequently seen along that highway, moving up and

down. OTG feels that it would be more appropriate to manage the Bear Creek parcel as a Special Management Area (with no motorized access) or a Wildlife Management Area.

In addition, OTG objects to the swath of new winter ROS motorized access, in the Preferred Alternative, that extends across Bear Creek, parallel to US550. Previously this was listed as “No Restrictions” but we don’t believe it was actually used by any snowmobiles in this area – it is bisected by a narrow and extremely steep canyon. The change from No Restrictions to Winter Motorized will likely increase the attention from snowmobile users and result in increased usage. This next-to-highway swath from north of Ironton to south of Ouray should not be motorized in the winter (except for the Engineer Pass Road) because of the frequent bighorn usage through that swath. The Colorado Department of Transportation actually has bighorn warning signs along that section of US550.

3) Hayden parcel. This approx. 10,000-acre area encompasses the Mt Hayden Ridge west of US550 and east of CR361. In their Draft Plan comments OTG originally supported that this area be designated as General Forest, but with added protections. We supported winter and summer ROS as semi-primitive non-motorized as they were in the Draft Preferred Alternative B, and are currently. Because of the steep terrain and few maintained trails this area is less visited and provides a remote user experience. The area is also close to the US550 corridor where increasing recreation use, commercial outdoor recreation, and private land development are exerting ever more pressure on wildlife resources and natural scenic values. As stated in our Draft comments, OTG would like land use decisions in the Hayden Ridge area to constrain recreation development to lower elevations near the US550 corridor, and leave the higher elevations undeveloped to protect the natural scenic values and remote setting.

In the current Released Preferred Alternative the USFS has changed the ROS management in the Hayden parcel and put a large summer motorized area in it, extending from Spirit Gulch to McIntyre Gulch and up to 12,000 ft (well above treeline). In the Draft Preferred Alternative B this area was not motorized, and it was also not motorized in the Draft Alternative C. This area is not winter motorized in the Released Preferred Alternative ROS. There are indeed old mining roads in this area, but they are always gated at the highway and are now overgrown. The very lowest part of the road leaving the Highway is gated and goes back to some sort of Utility area, but is extremely low down – certainly not up to the mines. This is an area much-loved by locals and has never been motorized in our experience. The flowers in this area are wonderful in the summer, and because it is non-motorized and less-used than

more popular tourist trails, there are lots of elk, deer and even moose back there – it is a wonderful area to hike in. OTG members have even heard coyotes howling back there. Even though the USFS has told us that the designation does not mean it WILL be motorized, just that it COULD be, this change makes OTG more firmly believe that this area truly needs to be more highly protected as a Wildlife Management Area, or a Special Management Area, with no motorized access. Traditionally, in Ouray County the west side of the highway south of Ironton has been non-motorized (summer and winter) and the east side has been motorized. The protections on the west side need to be made stronger – the reason there is so much wildlife there is precisely because it is non-motorized.

4) Abram parcel. This 3,000-acre area is proposed as General Forest in the Released Preferred Alternative B. It is east of US 550 and includes 4-wheel drive roads south of Engineer Pass and west of Poughkeepsie Gulch. We appreciate that the USFS did cutout the winter ROS around the Ironton Nordic trails to semi-primitive non-motorized from semi-primitive motorized. As with the Hayden parcel above, OTG objects to the timber suitability within the view shed of US550 in this region as well as to the potential for fen damage from timber removal.

Again, OTG thanks the GMUG Planning Team for their hard work and the opportunity to participate in this process.

Ames Risch
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President, Ouray Trail Group