

Data Submitted (UTC 11): 10/29/2023 9:27:32 PM

First name: Jennifer

Last name: Cram

Organization:

Title:

Comments: 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 29, 2023

Thank you for the opportunity to object to the GMUG National Forest Plan and FEIS. I submitted 2 comment letters on the Draft Plan on 11/24/21. One of the letters addressed land issues, and other letter addressed bighorn issues. The bighorn letter had some SCC issues which I am addressing in a separate objection per the process. In this letter I am objecting to land issues from my 11/24/21 comment letter.

1) Timber Suitability

As I stated in my original comments "The aspen and spruce/fir forests along US550 and also along the north side of the Sneffels Range are amazingly beautiful and bring thousands of visitors; we can't have the trees harvested. Even patches of harvest would mar the beautiful views." I object that the Timber Suitability map for the Released Preferred Alternative B still has patches of red/suitable timber next to and very close to US550 between Ironton and Red Mountain Pass. US550 is a Scenic Byway - there should not be any timber production next to the highway or within the Scenic Byway overlay (0.5 mile on either side of road) or within the view shed from the highway.

In addition, the slopes above US550 south of Ironton (both east and west sides) drain into the biologically important and pristine Ironton Iron Fen area - any timber harvest production above and upstream has the potential to damage this area. The iron fens and wetlands on both sides of the highway in the Ironton area would be especially 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. I object to the remaining suitable timber patches along and upstream of the iron fens, in both sides of the highway.

I also object to the large patches of timber suitability in Ouray County along the north side of the Whitehouse CORE Act Wilderness Addition. Large scale timber harvest in this area would mar the iconic views of the Sneffels range - these views are why many of us live here and why many of the tourists visit here.

2) Bear Creek polygon O3a

This 6,000 acre parcel is discussed and listed as polygon O3a in the FEIS Part 1. I originally commented that this parcel should be recognized as Wilderness (as in Alternative D). I recognize the obstacle to that with the current Hard Rock 100 race and trail maintenance (motorized tools). I appreciate that Bear Creek was made a Wild and Scenic River (with 0.5 mile wide protective swath) and that the Bear Creek Trail was mapped with a 1.0 mile wide protective swath, but there is so much more important land and habitat there; I believe that General Forest is not enough protection for this very unique area. 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 simply because it is very hard to get up there. As a result of the solitude it is also one of the areas where bighorn sheep

frequent high up in the summer. This area is an important part of the habitat for the Tier 1 S-21 Cow Creek bighorn herd; bighorn sheep frequent the high ridges above Bear Creek as well as the high meadows and ridges above Ouray north towards Bridge of Heaven. In the winter the bighorns move down and are frequently seen along US550, moving up and down to the river. My objection is that a General Forest designation simply does not protect that area as needed- it would be more appropriate to manage it as a Special Management Area (with no motorized access) or as a Wildlife Management Area.

In addition, there is a swath of new winter ROS motorized access in the Released Preferred Alternative, that extends across Bear Creek, parallel to US550. Previously this was listed as "No Restrictions" but I can't believe it was actually used by any snowmobiles in this area - it is bisected by the narrow, deep, and extremely steep canyon. The change from previous "No Restrictions" to Winter Motorized will likely increase the attention from snowmobile users and result in increased usage. My objection is that this swath from north of Ironton to south of Ouray should not be motorized in the winter 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 is an approximately 10,000 acre area on the west side of US550 (east of CR361 and north of Red Mountain Pass) encompassing the Mt Hayden Ridge. This parcel is listed as General Forest in the Released Preferred Alternative; I commented on the Draft Plan that this area should be designated as a Special Management Area. An SMA designation would still allow existing helitrax and in-holding lodge uses but would also be protective of this unique area. Although there is a lot of mine scarring and some old mining roads (overgrown, not used), many parts of it are extremely

hard for people to get to - steep hikes as well as fewer maintained trails; this makes it more remote than on-map miles would imply. Even though the highway is visible it is far and very steeply below. Many times I have seen elk frequent the trees and benches north of Richmond Pass, and I know that elk and deer are common in the steep and

forested slopes on the west side of the ridge. This Hayden area (and the Bear Creek polygon) are some of the largest and most practically remote areas left in Ouray County - we have to protect them while we still can. My objection is that this area needs the stronger SMA or WMA protection.

The Hayden area bordering US550 was previously, and in the Draft Preferred Alternative B, entirely non-motorized in the summer and winter ROS. In the Released Preferred Alternative B there is a large area from Spirit Gulch to McIntyre Gulch, and up to the Barstow and Greyhound Mines (in the alpine, above treeline) that has been designated summer motorized ROS. This area has been non-motorized (summer AND winter) as long as I have known it - the old mine roads are overgrown and inaccessible except for a very short portion near the Highway that I believe is used by the electric utilities. This area is a much used locals' hiking area, with amazing flowers and wildlife - I have seen deer, elk, moose (moose tracks and scat), and heard coyotes howling back there. The reason that so much wildlife is there is that it is NOT motorized - that whole section from Ironton to Red Mountain Pass on the west side has not been motorized (summer or winter) while the east side has. I strongly object to this summer ROS motorized designation in the Released Preferred Alternative B. Even though the USFS has said that the designation does not mean it WILL be motorized, just that it COULD be, I truly believe that this area needs to be more highly protected as a WMA, or a SMA, 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 obviously need to be made stronger - the reason there is so much wildlife there is precisely because it is non-motorized.

Thank you again for the opportunity to participate in this process.

Jennifer Cram
Jennifer Cram