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

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:

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- * 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[Footnote: 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. 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} [Footnote: 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=](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).) 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 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.

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- * 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 [ndash] processes that pre-dated the Community Proposal [ndash] 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's 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 [Footnote: 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.]

Colorado Parks and Wildlife Field Services Assistant Director Heather Dugan explained in the press release, [Idquo]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.[rdquo] 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.

- * 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 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 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.

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* 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 [ndash] 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 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 "[hellip] may allow for timber harvest for purposes other than timber production[hellip] 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[hellip] The technology is not currently available for conducting timber harvest without causing irreversible damage to soil, slope, or other watershed conditions[hellip]"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 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[hellip]"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

1. 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

1. 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.

2. 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 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

3. 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.

1. "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: "[hellip][SUGGESTED NEW]promote the ecological integrity of these national forests.[SUGGESTED NEW]" Through collaboration, education, and shared stewardship, these national forest lands are managed "[SUGGESTED NEW]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.[SUGGESTED NEW]"¹⁸

2. "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."

3. The DRLMP Glossary needs to change the provided definition of Ecological sustainability (currently, "Ecological sustainability: The capability of ecosystems to maintain ecological integrity.[rdquo]) and recognize that Ecological integrity is a component of Ecological sustainability. Ecological sustainability is definedas 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

4. 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 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.

5. Ecosystem diversity and species diversity are components of ecological sustainability [2012 FPR 219.20 (a)].

6. 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."

7. 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.

[SUGGESTED NEW] 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:

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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:

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. [SUGGESTED NEW]

1. 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.

2. 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.

1. 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.

2. 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 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.

3. 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.

1. 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).

1. 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.

2. 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 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)

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.

1. 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

2.

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.

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

1.

* 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:

1.

* 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.

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

1.

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-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.

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 DirectionA. Areas to be Analyzed as Wilderness:

1.

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.

[EXCERPTED MAP: PROPOSED BEAR CREEK ADDITION]

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.

1.
1.

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.

[EXCERPTED MAP: PROPOSED BALDY ADDITION]

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.

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 [ldquo]High[rdquo] 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 [ndash] 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).

[EXCERPTED MAP: MOUNT ABRAM SCENIC SPECIAL INTEREST AREA]

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

1.

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 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 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.

[FOOTNOTE: 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).)] 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.

[EXCERPTED MAP: SPECIAL INTEREST PARCELS]

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 bio- diversity 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.

[EXCERPTED MAP: HAYDEN AND ABRAM PARCELS]

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.

1. 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.

2. 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 [ndash] Whitehouse Mountain East and Whitehouse Mountain West.

3. 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.

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 [ldquo]Fatal Flaw[rdquo] Cooperating Agency comments on the May 2021 DRLMP dated July 16, 2021.