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Organization: Ridgway Ouray Community Council (ROCC)
Title: Member
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 30, 2023

Note that ROCC (same authors) submitted an objection on October 29, 2023. This objection supersedes and replaces that - we have added more information on the Iron Fens.

Thank you for the opportunity to object to the GMUG National Forest Plan and FEIS. Please accept this objection on behalf of the Ridgway Ouray Community Council (ROCC). The ROCC original comment letter was submitted on 11/12/2021 by Kate Kellogg, and signed by co-presidents Kate Kellogg and Vicki Warner-Huggins. This current objection letter is signed by current co-president Carolyn Dresler and ROCC member and lead objector Jennifer Cram.

ROCC is a nonprofit community organization whose mission is to build, nourish and protect the healthy spirit of our community. We recognize the huge scope and amount of work that has been invested by the USFS in the released plan. Our original comments and current objections focus on the plan components in and very close to Ouray County.

Following are the ROCC objections, organized by region and subject within Ouray County:

1) Bear Creek polygon O3a
This 6,000 acre parcel is discussed and listed as polygon O3a in the FEIS Part 1. ROCC originally commented that we wished this parcel could be recognized as Wilderness (as in Alternative D). We recognize the obstacle to that with the current Hard Rock 100 race and trail maintenance (motorized tools). However, we 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 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 where bighorn sheep frequent high up in the summer. In the winter the bighorns move down and are frequently seen along that highway, moving up and down. We 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. However we feel that a General Forest designation just 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 a Wildlife Management Area.

In addition ROCC 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 do not believe it was actually used by any snowmobiles in this area - it is bisected by a deep 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 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.

2) 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 Preferred Alternative, and ROCC did advocate for a General Forest designation. However, this area was all non-motorized previously (summer and winter) and in the current Preferred Alternative the USFS has changed the management and suddenly put a large summer motorized area in it, extending from Spirit Gulch to McIntyre Gulch and up to 12,000 ft.

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 (gated) 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. In addition, 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. ROCC 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, we 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. It needs stronger protection than General Forest.

ROCC also originally commented that the much-photographed aspen and spruce/fir forests along US550 are an important part of the economic health of Ouray County. The Timber Suitability maps in the Released EIS do show decreased timber suitability from the draft version but there are still significant patches of timber suitability close to the Highway between Ironton and Red Mountain Pass. Some of the patches are actually within the Scenic Byway corridor. The timber suitability map should be altered to not allow these areas that are within the view shed of US550.

3) Abram parcel
This is a 3000 acre parcel east of US 550 from approximately Ironton to Red Mountain Pass. We appreciate that the USFS did cutout the winter ROS around the Ironton Nordic trails to semi-primitive non-motorized from semi-primitive motorized. However, as with the Hayden parcel above, ROCC 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 (see below for fen discussion).

4) Timber Suitability related to Iron Fens on the Hayden and Abram parcels
ROCC would also like to object to the timber suitability maps in the Hayden and Abram region because of the uniqueness and pristine condition of the Ironton Iron Fens, on both sides of the highway. Any timber harvest near and upstream of these fens will not be good for their health. These iron fens and wetlands in the Ironton area 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. The Final EIS does state that the USFS fine-grained analysis did reduce the timber suitability, but ROCC believes it needs to be further reduced in this area to protect the iron fens.

Groundwater dependent ecosystems include wetlands, lakes, streams, springs as well as subterranean ecosystems and are directly tied to land use practices and management strategies (Minckley & Unmanck, 2000; Stacey et al., 2011). These systems, particularly wetlands and springs, provide critical refuge for species during drought and support disproportionately high amounts of biodiversity relative to their size (Costelloe & Russell, 2014; Davis et al., 2013; Kurzweil et al., 2021; Misztal et al., 2016). The GMUG has identified, through

the work of the Spring Stewardship Institute as well as GMUG staff that the highest number and density of springs is located in the Uncompahgre National Forest (US Forest Service, 2018), and it has been documented that this area also has a high concentration of an even more rare and high functioning system, iron fens (Johnston et al., 2012). Fens are a groundwater dependent wetland that accumulates at a minimum, 40cm of peat. These systems represent less than 3% of the global land surface, yet store double the amount of carbon that the worlds forest store, which represent close to 40% of the land surface (Beaulne et al., 2021; Rodney A. Chimner et al., 2002), making these systems critical to protect, as they can move quickly from a carbon sink, to a carbon source via degradation (Leifeld & Menichetti, 2018; Liu et al., 2019). Iron fens provide an additional critical ecosystem service outside of carbon storage, this is metal cycling. These fens have co-evolved with acidic metal laden water, and due to the biogeochemical properties, are able to change the speciation of metals, allowing them to precipitate out before reaching primary flow paths (Stefan Kügler, Rebecca E. Cooper, Carl-Eric Wegner, Jan Frieder Mohr, Thomas Wichard, 2019). Both the Hayden and Abrams parcels have been identified as having some of the best examples of intact, high functioning iron fens in the San Juans as Identified by Dr. Rod Chimner, global peatland specialist, and Dr. Jake Kurzweil, a local wetland scientist. These systems are not only rare globally, but these iron fens are also rare locally and are incredibly sensitive to landscape disturbances (Chimner et al., 2010). Both the Hayden and Abrams parcels have been identified as suitable for timber harvest and this decision gives this group pause due to the documented presence of critical wetlands and fens located in this region (Johnston et al., 2012). The negative impact of logging on wetlands has been documented for over three decades (Richardson, 1994) and the impacts of logging on fens can be seen in other national forests of the U.S. (U.S. Forest Service, 2018). The proposed suitable logging sites in the Hayden and Abram parcels coincide with the location of the highest density of fens in the GMUG forest (Johnston et al., 2012). This creates the potential to degrade or destroy these rare systems that provide many ecosystem services to the plants, animals, and humans that depend on them.

5) Timber Suitability on north side of Sneffels range
ROCC commented on the draft plan "The aspen 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." In the Released Plan's Timber Suitability Map there are large areas of suitable timber north of the Sneffels range in the East and West Whitehouse Wilderness Additions from the CORE act. We object that extensive timber harvest in this area will mar the iconic Sneffels views that Ouray County is famous for.

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

Jennifer Cram
Jennifer Cram, ROCC member and Lead Objector

Carolyn Dresler
Carolyn Dresler, ROCC Co-President

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