Dear GMUG Planning Team,

Thank you for accepting these comments regarding the GMUG Forest Plan Working Draft.

First and foremost, we wish to express our ardent support for the Community Conservation Proposal submitted to your office by numerous conservation organizations that have worked diligently with diverse local stakeholders to ground truth the landscapes and determine boundaries. This Conservation Proposal protects watersheds, wildlife habitat and corridors, plant biodiversity and forest health while continuing to provide access for recreation and agricultural uses that drive our local economy. In these times of expanding population, increased recreation use and climate change, crafting a forest management plan that ensures ecosystem integrity and resiliency into the future is essential and something we urge you to consider throughout the planning process. We feel the Community Conservation Proposal aims for this goal and we encourage you to incorporate it into your preferred alternative. We commend you for recommending as wilderness those lands already identified in the CORE Act (and previously the San Juan Mountains Wilderness Act,) however we ask you to also include the landscapes within Ouray County included in the Conservation Proposal that you have not recommended in the working draft namely:

1. Baldy addition to the Uncompahgre Wilderness,
2. Bear Creek addition to the Uncompahgre Wilderness,
3. Hayden Mountain Wilderness and
4. Abram and Brown Mountains Special Management Area.

We also request that you consider Bear Creek eligible for Wild and Scenic River designation along with Cow Creek that you did find eligible.

Residents and visitors cherish these areas for their scenic beauty, recreational opportunities, cultural and historic values, and opportunities for solitude and personal renewal. These same landscapes support diverse wildlife populations including, but not limited to Canada lynx, bighorn sheep, elk, mule deer, and black bear. Sportsmen and women come from all over the US to hunt in these areas and many people who enjoy wildlife watching make Ouray County their travel destination or home for this reason.

Bear Creek, Hayden Mountain and the Abram/Brown Mountain complex were not evaluated during the 1970s Forest Service Roadless Area Review and Evaluation (RARE) processes because they were within the Uncompahgre Primitive Area administratively designated in the early 1930s. An administrative process of review and reclassification of primitive areas as “wilderness” later in the 30s was never completed. As a result, when the 1964 Wilderness Act was made into law and these reclassified “wilderness” areas were automatically designated as Wilderness by Congress, the Uncompahgre Primitive Area landscapes were left out. The Uncompahgre Primitive Area was dissolved in 1980 with the enactment of the Colorado Wilderness Act, which designated the Uncompahgre Wilderness (then Big Blue.) Since Bear Creek, Hayden and Abram/Brown were not roadless areas, they were overlooked.

In summary, these three landscapes have been valued for their wild and primitive character since the 30s, but never received any formal recognition or designation beyond the Uncompahgre Primitive Area, which is unknown to most people. The classification of these landscapes as “general forest” in the Working Draft provides no specific protection for natural resources that we strongly believe are deserved. Please reevaluate these polygons for wilderness qualities using the boundaries proposed in the Community Conservation Plan. We urge you to find Bear Creek, Hayden and Baldy (which is a Roadless Area) worthy of wilderness recommendation. Given that Abram/Brown Mountains do not meet the 5000-acre minimum for wilderness, we ask that you consider them some type of special management area.

In addition to our strong support for the Community Conservation Proposal, we offer the following comments regarding the overall Working Draft. See Talking Points for GMUG Working Draft.