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Sent via email: gmugforestplan@fs.fed.us

Re: Draft Wild and Scenic Eligibility Evaluation for the Grand Mesa Uncompahgre and Gunnison National Forests

American Whitewater appreciates the opportunity to submit comments in association with Outdoor Alliance and the Telluride Mountain Club on the Forest Service's Draft Wild and Scenic Eligibility Evaluation for the Grand Mesa Uncompahgre and Gunnison National Forests (GMUG).

About American Whitewater

American Whitewater is a national 501(c)(3) non-profit organization with a mission "to conserve and restore our nation's whitewater resources and enhance opportunities to enjoy them safely". With 6,000 individual and 100 affiliate club members, American Whitewater represents the interests of over 80,000 river enthusiasts. As conservation-minded whitewater recreationists, we place a high value on protecting naturally functioning river ecosystems including their fish and wildlife, geomorphic processes, and potential to provide clean and safe drinking water. Our membership and the general public highly value our nation's river systems and associated riparian zones, and we have a direct interest in maintaining healthy rivers for everyone to enjoy. There are numerous creeks and rivers within the GMUG boundary that attract our members from across the region and the country, and we support management actions that protect and preserve healthy riparian systems and provide unique recreational opportunities. American Whitewater has continued to participate throughout the GMUG Plan Revision process, including submitting comments on the Draft Wilderness Evaluation, participating in numerous GMUG planning webinars, and communicating directly with the Forest Planner.

Introduction

The Western Slope of Colorado has no designated Wild and Scenic Rivers, despite that the region is host to some of the nation's most prized, free-flowing rivers and streams. To be eligible, a stream must be free-flowing and have at least one "outstandingly remarkable value" (ORV) that is regionally or nationally significant.¹ These ORV's are specific place-based values associated with recreation, scenery, geology, history, fisheries, culture, and other types of values. Eligibility is important as it ensures interim protection for these very special rivers and streams.

The Wild and Scenic Rivers Act was signed into law in response to the nation's dam building efforts. Currently on Colorado's Western Slope, the Colorado, Gunnison, Taylor, San Miguel and Uncompahgre Rivers are impacted by dams to varying levels, to name a few. In addition, transmountain diversions threaten the Gunnison River Basin, where many of the GMUG's last free-flowing rivers originate. A number of rivers within the GMUG are also threatened by historical and proposed mining operations.^{2,3} We thus believe that a robust inventory of each stream's eligibility for Wild and Scenic designation is justified, as well as required by law.

We appreciate the work that the Forest Service has done thus far on the Draft Evaluation and the inclusion of 30 eligible stream segments, including 18 that have not been previously determined eligible. However, the Draft Wild and Scenic Eligibility Evaluation fails to recognize numerous rivers that are both free-flowing and have at least one ORV. The Eligibility phase of the Wild and Scenic Act is designed to be the most broad, with the least number of qualifications. Factors such as competing use, land ownership, opinions on designation, etc. should not be considered in the eligibility phase. We ask that the Forest Service complete a more robust Wild and Scenic Eligibility Evaluation and consider *every* river segment that is both free-flowing and has one or more ORV - of which there are many within the GMUG. In the following comments, we have identified sections of the Draft Report that we agree with, areas of concern, and we offer specific recommendations for eligible river reaches within the GMUG.

General Comments

Agree that only eligibility and preliminary classification should be carried out as part of the current plan revision process

As stated in the Draft Report, the Forest Service should stop at the Eligibility phase. On Page 1, the Draft Report states that, "A Suitability Study is not required as part of the 2012 Planning Rule and would only be undertaken in certain circumstances. The [Forest Service] will initiate a Suitability Study when: Strong local interest or support is demonstrated for wild and scenic river designation, congress expresses interest in a specific river for wild and scenic river designation, and/or a proposed project would alter the free-flowing character of a stream, such as by

¹ Wild and Scenic Rivers Act, § 1273 (b)

² Bembenek, A. (2013). *Upper Slate River Watershed Plan*. Retrieved from Coal Creek Watershed Coalition: <http://www.coalcreek.org/documents-and-data.html>

³ Stantec Consulting. (2005). *Coal Creek Watershed Protection Plan*. Retrieved from Coal Creek Watershed Coalition: <http://www.coalcreek.org/documents-and-data.html>

impoundment, or would affect the resources that made the stream eligible.” American Whitewater asks the Forest Service to focus their energy on producing a robust Eligibility Inventory supported by public input and strong data; a Forest Service Suitability Study is neither needed nor required at this point.

The Forest Service should broaden their interpretation of the “recreation” Outstandingly Remarkable Value (ORV)

The interpretation of the definition is narrow and has led to the exclusion of numerous rivers that are both free-flowing and, in fact, possess a recreation-based ORV. The definition for a recreation-based ORV is written in the Forest Service Handbook (FSH)² and a similar definition is provided in the Draft Evaluation. Draft Evaluation Page 5 states, “Recreational opportunities are, or have the potential to be, popular enough to attract visitors from throughout or beyond the State of Colorado or are unique or rare within the Western Slope region of Colorado. Visitors are willing to travel long distances to use the river resources for recreational purposes... The river may provide, or have the potential to provide, settings for national or regional usage or competitive events.” (emphasis added) In this definition, “or” is used to list the ORV standards, indicating that the ORV threshold can be met by *either* the recreation opportunity being popular enough to attract visitors from throughout or beyond Colorado *or* by being unique or rare within the region. Because there is no use of “and”, popularity and uniqueness are not both required. In email communication⁴, the Forest Service stated that they focused on the latter part of the definition, using uniqueness as the primary standard for ORV qualification. This approach is inconsistent with the definition for recreation-based ORVs and has limited the scope of the Eligibility Evaluation. American Whitewater asks the Forest Service to use the full definition for recreation ORVs and expand the Eligibility Inventory accordingly.

The standards required to meet the “unique” ORV status should be adjusted

The Forest Service has set an unreasonably high standard when assessing the uniqueness of ORVs for potentially eligible river segments. For example, in discussion on the Taylor River, the FS declared that while the Taylor River is a Gold Medal Fishery, it is not unique because there are 322 miles of Gold Medal Fisheries in Colorado. This is a misconception because Colorado has 105,344 total stream miles⁵ and thus only 0.3% of stream miles are Gold Medal Fisheries; this small percentage indicates that a Gold Medal Fishery on the Taylor River is actually unique when compared to the State of Colorado. Similarly, the Draft Evaluation indicates on multiple segments (e.g., Anthracite Creek) that the paddling opportunities are not unique enough to meet the level of an ORV. However, the FS does not provide evidence to back up these conclusions.

⁴ Duffy, Brittany. “Re: Recreation ORVs” Message to Kestrel Kunz. 25 February 2019. E-mail.

⁵ <https://www.colorado.gov/pacific/cdphe/clean-water-rivers-lakes-and-streams>

In our recommendations below, we provide evidence showing how each segment should meet the ORV threshold.

Additional narrative and visual details should be added to the Draft Evaluation

The eligibility narrative descriptions need to be expanded to adequately describe the ORVs, as this will provide necessary guidance for interim protections. The Draft Evaluation lacks detailed maps and photos for each eligible segment. We recommend adding a geographic map for each segment, as well as photos that represent the ORVs present. In our eligibility recommendations below, American Whitewater has provided photos and other visual resources for the Forest Service. We are happy to provide full resolution images upon request.

The Draft Evaluation and “WSR Review Notes” includes insufficient data and justification on the Eligibility Determinations

- Of the 975 segments reviewed, 325 segments (33%) have no justification. The Forest Service needs to demonstrate that a thorough analysis of each river segment has been completed.
- Numerous justifications for ineligible segments simply state that the segment did not meet the ORV threshold, but no further explanation is given (e.g., Uncompahgre River Segment 2 and 3, Ruby Anthracite Creek, etc.). Providing further justification will help the public understand the process and allow for more robust public comment. Please provide details on *why* the ORV threshold was not met and which ORVs were considered.
- More than half of the justifications only cite the 2005 Working Maps and Comprehensive Assessment Appendix W-2, which does not provide sufficient evidence for or against eligibility (e.g., Ruby Anthracite Creek, Taylor River Segments, Slate River Below Eligible 2 segs, Poverty Gulch, San Miguel River, etc.). Appendix W-2 is simply a list of rivers that were reviewed and found ineligible in the 2005 Wild and Scenic Eligibility Evaluation. The Forest Service should give further explanation for these segments and address how circumstances have or have not changed on each segment since the 2005 Eligibility Inventory. Changed circumstances include broader recognition of recreational opportunities and changes to the river that make it more unique⁶. As described below in our eligibility recommendations, a number of river segments in the GMUG have had changed circumstances leading to a greater presence of ORVs, and therefore necessitate additional review.
- The need for more information and further research is frequently stated as a reason for ineligibility (e.g., Uncompahgre Gorge, East River Eligible Upper Section, etc.). Inadequate information should not be used as justification for ineligible determinations.

⁶ Forest Service Handbook 1909.12 Ch. 82.4

The GMUG hasn't had a full Plan Revision, including a Wild and Scenic Eligibility Evaluation, since 1983. The Forests can't afford to wait another 30-40 years before these rivers are adequately studied for their Wild and Scenic River Eligibility. Our comments provided here and American Whitewater's National Whitewater Inventory⁷ provide definitive information on numerous rivers in the GMUG and our careful and documented selection of specific rivers is evidence of that. We encourage the GMUG Forest Planning team to use this information to inform the Final Wild and Scenic Eligibility Evaluation.

Ineligibility justifications include contradictory reasoning

In some segments, the WSR Review Notes indicate that one or more ORVs were identified by the IDT and/or District Review (e.g., Anthracite Creek, Uncompahgre Gorge), but that the Responsible Official determined the segment was not eligible when reviewing all potential eligible segments in the Forest. This is contradictory and indicates that the Forest Service is not considering every river segment that is free-flowing and possesses at least one ORV. While the Responsible Official has the final decision making authority, decisions on ORVs should be informed by the Interdisciplinary Team, best scientific information, and public input⁸. In cases where the Responsible Official disagrees with identified ORVs, a defensible argument should be provided.

Comments on Individual River Segments

We appreciate the inclusion of the 30 eligible river segments (112 river miles) in the Draft Eligibility Evaluation and extensive research that the Forest Service undertook in this review. We support eligibility for all 30 of these segments. However, only 3% of the reviewed rivers were found eligible and numerous ORVs have been overlooked. We provide the following segment-specific eligibility recommendations for the purposes of informing the Final Eligibility Evaluation. The following is divided into two categories: Requests for New Eligibility Findings and Support for Draft Eligibility Findings.

⁷ [https://www.americanwhitewater.org/content/River/view/?](https://www.americanwhitewater.org/content/River/view/)

⁸ Forest Service Handbook 1909.12 Ch. 82.73

Requests for New Eligibility Findings:

1. Anthracite Creek and Ruby Fork Tributary (Dark Canyon)⁹

- Recommendation: *The Anthracite River and the Ruby Fork Tributary should be found eligible, Recreation ORV, Wild Classification*
- Tributary of: North Fork of the Gunnison
- Ruby Fork TH 836 to Anthracite River
- Anthracite-Ruby Confluence to Erikson Springs CG



- Free-flowing: *Yes*. Ruby Fork is free of impoundments and man made structures within this segment. The Anthracite River is also free of impoundments and diversions.
- ORVs:
 - *Recreation*. The Ruby Fork and the mainstem Anthracite River offers a very unique, mandatory hike-in paddling experience. Paddlers hike their crafts (e.g., kayaks, packrafts, canoes) three-miles along the Dark Canyon Trail to the Ruby Fork of the Anthracite. Depending on the flows, the river provides continuous class IV-V whitewater and gradually gets easier after the confluence with the mainstem Anthracite River. Advanced paddlers from around the state travel to experience the awe-inspiring views and rapids of Ruby-Anthracite. This segment has the longest required hike in, making it both unique and attractive to adventurous paddlers. After the river flows have dropped, fishermen hike out into the Dark Canyon for some incredible dry-dropper fishing opportunities. The Ruby Fork and the Anthracite River have been recognized in paddling guide books since 1995 and described as wilderness in character with incredibly scenery¹⁰.
 - *Scenery*. Both the Ruby Fork and the mainstem Anthracite offer jaw-dropping views of Marcellina Mountain that are unique to the river corridor. As the hiking trail connects with the Ruby Fork, you are surrounded by lupine, bluebells, and towering Aspens. Once on the water, Marcellina is viewed on the left and shear cliff walls close you in on the right. At the confluence with the mainstem Anthracite the views only get more impressive as the river abuts against the dark, towering walls of

⁹ Photo retrieved from <https://lacemine29.blogspot.com/2017/07/open-mind-summit.html>

¹⁰ Banks, G. and Eckardt, D. Colorado Rivers and Creeks. Hong Kong, (Dave Eckardt and Gordon Banks, 1995), 145.

Marcellina. The Dark Canyon has been described as “featuring cliff walls and towering vistas that rise hundreds of feet from river level”.¹¹

- Additional Comments:
 - On the Ruby Fork, the Draft Evaluation states that no ORVs were identified. We disagree with this finding and have identified unique paddling and fishing opportunities on this segment that meet the threshold of a Recreation ORV, as well as unique, river-dependent scenic views within the river corridor.
 - On the mainstem Anthracite, the District Review identified ORVs of kayaking, fishing, scenery, and geology. American Whitewater agrees with the District Review opinion. The paddling opportunities on the Ruby Fork and mainstem Anthracite are incredibly unique, hike-in access only, challenging, and adventure-seekers from around the state travel to experience these rivers.
- Classification: *Wild*. The Ruby Fork and Anthracite River are free of impoundments and diversions. It is only accessed via a three-mile hike on the Dark Canyon Trail (TH 836) and there are no established roads in the vicinity. There is a low-impact foot trail that follows the river from the Ruby confluence to the takeout.
- Additional Resources:
 - AW River Inventory Page: [Anthracite, Ruby Fork](#)
 - Media:
 - <https://vimeo.com/224276599>
 - <https://www.youtube.com/watch?v=mEfp1NtMqtg>

2. Upper Taylor River

- Recommendation: *The Upper Taylor River should be found eligible, Recreation & Scenery ORVs, Recreation Classification*
- Tributary of: Gunnison River
- Headwaters to FS Boundary near Illinois Creek
- Free-flowing: *Yes*. From the headwaters to the FS Boundary, the Upper Taylor River is free of impoundments.
- ORVs:
 - *Recreation*. A high mountain gem - the Upper Taylor River offers



¹¹ Stafford, E. and McCutchen, K. *Whitewater of the Southern Rockies*. (Wolverine Publishing, Silt (CO), 2007), 128.

- unique paddling and fishing opportunities. The river is incredibly scenic, with continuous beginner-intermediate whitewater. The GMUG does not offer many beginner-intermediate paddling runs, making this stretch a unique attraction for rafters, family floating trips, and kayakers alike. In addition, this stretch is very popular for dry-fly fishing opportunities.
- *Scenery.* The Upper Taylor is in an alpine meadow setting with incredible views of the surrounding peaks. This view is much unlike other river corridors in the region, which are commonly in canyons and densely forested.
 - *Classification: Recreational.* The Upper Taylor River is free of impoundments and man made structures, however the river is paralleled by an unpaved road (NF-742) and should be classified as Recreational.
 - *Additional Resources:*
 - AW River Inventory Page: [Upper Taylor River](#)
 - Media:
 - [Yeti Gone Crazy Blog](#)

3. Lower Taylor River (Taylor River Canyon)

- *Recommendation: The Lower Taylor River should be found eligible, Recreation ORV, Recreation Classification*
- *Tributary of: Gunnison River*
- *Lottis Creek to FS Boundary near Almont*
- *Free-flowing: Yes.* This segment is downstream of the Taylor Park Reservoir, however the segment itself is free-flowing in character with minimal man-made structures and diversions. The Reservoir User Group manages the



reservoir to best mimic natural flows for fisheries. The FSH (Ch. 82.71) makes it clear that a river segment may still be considered free-flowing if it flows between large impoundments and/or if small impoundments exist within the reach.

- *ORVs:*
 - *Recreation.* The Taylor River Canyon between Lottis Creek and the FS Boundary near Almont offers Class II - IV paddling opportunities in a scenic canyon setting. This stretch brings the local paddling community together for a well-loved “Taylor

Tuesday” tradition and attracts paddlers from across the state. The Taylor Canyon boasts one of the longest paddling seasons in the Upper Gunnison Valley and its boulder-garden character sets it apart from other rivers in the area. In addition, the Taylor River is host to an annual Kayak and Raft Race as part of the Gunnison River Festival. This special river canyon brings together extreme kayakers, rafters, and beginners, providing an experience for all types of paddlers.

- Classification: *Recreational*. Although often not visible from the river, this stretch is paralleled by CR 742 and the river is accessed in multiple places by the road.
- Additional Resources:
 - AW River Inventory Page: [Lower Taylor River](#)
 - Media:
 - [Southwest Paddler Page](#)
 - [2019 Taylor River Race](#)

4. Slate River (Headwaters to Poverty Gulch)

- Recommendation: *From the headwaters to Poverty Gulch, the Slate River should be found eligible, Recreation & Scenery ORV, Scenic Classification*
- Tributary of: East River
- Headwaters to confluence with Poverty Gulch (i.e., Daisy Creek)
- Free-flowing: *Yes*. This segment of the Slate River is free-flowing in its entirety. There are no diversions or man made structures and the banks are largely undeveloped, save for the Slate River Road which parallels the river in places.
- ORVs:
 - *Recreation*. This segment of the Slate River (known as the North Fork Slate to most paddlers) provides the most challenging creek boating experience in the Gunnison Valley. It is famous for its gigantic falls, the North Fork



Slate Falls, and extremely tight chutes¹². Guide books have given it a 4-star rating and it provides a unique challenge for the bravest of paddlers¹³. The Class V+ paddling section starts approximately one mile upstream from the confluence with Poverty Gulch.

- *Scenery*. The headwaters of the Slate River is nestled between Treasury and Purple Mountain, offering awe-inspiring views of the Ruby Range. Downstream of the headwaters, the extreme waterfalls provide scenic views and photography opportunities.
- Additional comments:
 - The 2005 Comprehensive Evaluation Assessment determined this stretch to be Eligible with a scenery ORV for the canyon terrain and waterfalls. The scenery conditions have not negatively changed since 2005, indicating that the scenery ORV determined in 2005 should be carried forward in the current Draft Evaluation. Since 2005, the creek boating on this stretch has become more well-known and it's uniqueness recognized in regional guide books¹⁴, thus necessitating the addition of a Recreation ORV. If anything, the ORVs on this segment have become more prominent since 2005.
- Classification: *Scenic*. The Slate River is paralleled in some places by an unpaved road and hiking trails, however the banks are largely undeveloped and the river is void of man-made structures.
- Additional Resources:
 - AW River Inventory Pages/Photo Gallery: [North Fork Slate River](#)
 - Media:
 - https://www.youtube.com/watch?v=n3Vq_A2kkvU
 - <https://vimeo.com/183392076>
 - [Yeti Gone Crazy Blog - North Fork Slate](#)

¹² <http://yetigonecrazy.weebly.com/north-fork-slate.html>

¹³ Stafford and McCutchen, Whitewater, 134

¹⁴ Ibid. 134

5. Slate River (Poverty Gulch to Oh-Be-Joyful)

- Recommendation: *The Slate River should be found eligible, Recreation ORV, Scenic Classification*
- Tributary of: East River
- Poverty Gulch to Oh-Be-Joyful
- Free-flowing: *Yes*. There are no man-made structures in the river, although small well-rights and small conditional water rights exist on the Slate River. At this time, this river segment meets the qualifications for free-flowing.
- ORVs:
 - *Recreation*. This stretch of the Slate River has been recognized in multiple guidebooks for the region^{15 16}. It provides a different experience than the other creeks in the valley; its gradient is less significant than the other creeks in the area and the hydraulics are fierce. Still a challenging Class V kayaking run, this segment has a longer paddling season than its neighbors.
 - Classification: *Scenic*. The Slate River is paralleled in places by an unpaved road (CR 734) and hiking trails and is accessible at certain points. The river drops away in many places as it flows through the Slate River canyons. There are no man-made structures in the river, although small well-rights and small conditional water rights exist on the Slate River.
 - Additional Resources:
 - AW River Inventory Pages/Photo Gallery: [Upper Slate River](#)
 - Media:
 - https://www.youtube.com/watch?v=n3Vq_A2kkvU
 - <https://vimeo.com/183392076>
 - [Yeti Gone Crazy Blog - North Fork Slate](#)



¹⁵ Stafford and McCutchen, Whitewater, 132

¹⁶ Banks and Eckardt, Colorado Rivers, 164

6. Slate River Segment (Oh-Be-Joyful to Town of Crested Butte)

- Recommendation: *The Slate River should be found eligible, Recreation, Botanical, & Wildlife ORVs, Scenic Classification*
- Tributary of: East River
- Oh-Be-Joyful to Town of Crested Butte
- Free-flowing: *Yes*. There are a couple insignificant diversions upstream of the Coal Creek confluence and the Mount Emmons Mining Company has a small conditional water right near the Oh-be-Joyful confluence, however none of these impact the natural flow regime of the river and at this time the segment meets the qualifications for free-flowing.



- ORVs:
 - *Recreation*. In the past few years this segment of the Slate River has become incredibly popular for Stand Up Paddleboarding (SUPing), a relatively new sport. It has been recognized as some of the best SUPing in the state for its mellow floating experience, grandeur views of the Slate River Valley, and surrounding natural environment. This segment also offers a rare beginner opportunity for kayakers. In the Upper Gunnison Valley there are no other flatwater boating opportunities where people can learn to kayak in a safe environment.
 - *Botanical*. Please refer to High Country Conservation Advocates' comments on this segment for in depth details on the Botanical ORV of this segment.
 - *Wildlife*. Please refer to High Country Conservation Advocates' comments on this segment for in depth details on the Wildlife ORV for the high-altitude heron habitat.
- Additional Comments: Although part of this segment extends outside of the USFS Boundary, we believe that its many ORVs warrant its inclusion as an Eligible river segment. According to the FSH¹⁷, a river segment may extend beyond the USFS Boundary in certain circumstances. In this case, there are ORVs that extend downstream of the USFS Boundary on the Slate River that depend on protections under the Wild and

¹⁷ Forest Service Handbook, 1909.12 Ch. 82.61

Scenic Rivers Act. Additionally, the river maintains its incredibly scenic environment and remoteness until it reaches the Town of Crested Butte.

- Classification: *Scenic*. The majority of this segment is significantly distanced from CR 734 and is only paralleled by a non-motorized trail in some places. Although the segment has a couple minimal diversions and cattle fencing, it is largely void of man made structures and the banks are undeveloped.
- Additional Resources:
 - AW River Inventory Pages/Photo Gallery: [Middle Slate River](#)
 - Media:
 - https://www.youtube.com/watch?v=n3Vq_A2kkvU

7. Daisy Creek (i.e., Poverty Gulch)

- Recommendation: *Daisy Creek should be found eligible, Recreation & Scenery ORV, Scenic Classification*
- Tributary of: Slate River
- Headwaters to Slate River Confluence:
- Free-flowing: *Yes*. Daisy Creek is free-flowing in its entirety; it is free of impoundments, man made structures, and diversions.
- ORVs:
 - *Recreation*. Daisy Creek flows from its headwaters in Daisy Pass through Poverty Gulch and into the Slate River. Advanced paddlers put in below the first significant falls (40' tall) and quickly find themselves in fast moving water that drops over a series of short slides and drops. The thrill of the whitewater heightens as Big Woody Falls (22' tall) approaches. While still technical, Big Woody Falls offers a unique waterfall experience, without the commitment required of Oh-Be-Joyful.
 - *Scenery*. Daisy Creek meanders through the high alpine fields below Daisy Pass before it drops away from the meadows and into a committing, forested canyon. The character of the canyon is remote and the latter part of the run offers incredible views of the Slate River Valley.



- Classification: *Scenic*. The majority of Daisy Creek is set back from any roads or trails and requires a steep hike down into the canyon at the base of the 40' waterfall. At certain points the river is accessed by a 4x4 road (Poverty Gulch Rd) and towards the end of the stretch there exists a bridge over the creek.
- Additional Resources:
 - AW River Inventory Page: [Daisy Creek](#)
 - Media:
 - <https://vimeo.com/134668326>

8. East River

- Recommendation: *The East River should be found eligible, Recreation ORV, Scenic Classification*
- Tributary of: Gunnison River
- Gothic Road Bridge to East River Meanders
- Free-flowing: *Yes*. The East River is free of impoundments and man-made structures
- ORVs:
 - *Recreation*. The primary section of the “Upper East” is the easiest of the four high-quality creeks in Crested Butte, but the end of this stretch includes “Stupid Falls”, a spectacular waterfall that is one of the tallest in the state. At moderate flows, the upper stretch provides an unique opportunity for intermediate paddlers to test their skills on slides and moderately sized falls¹⁸. This segment is set in the Gothic Valley, the wildflower capital of Colorado and provides scenic views of the East River corridor.
- Classification: *Scenic*. Immediately after the put-in bridge, the river drops away from the road into a narrow canyon and there is a mandatory hike-out to a dirt road at the end of the segment. The river banks are largely undeveloped and there are no impoundments or man made structures in the river.



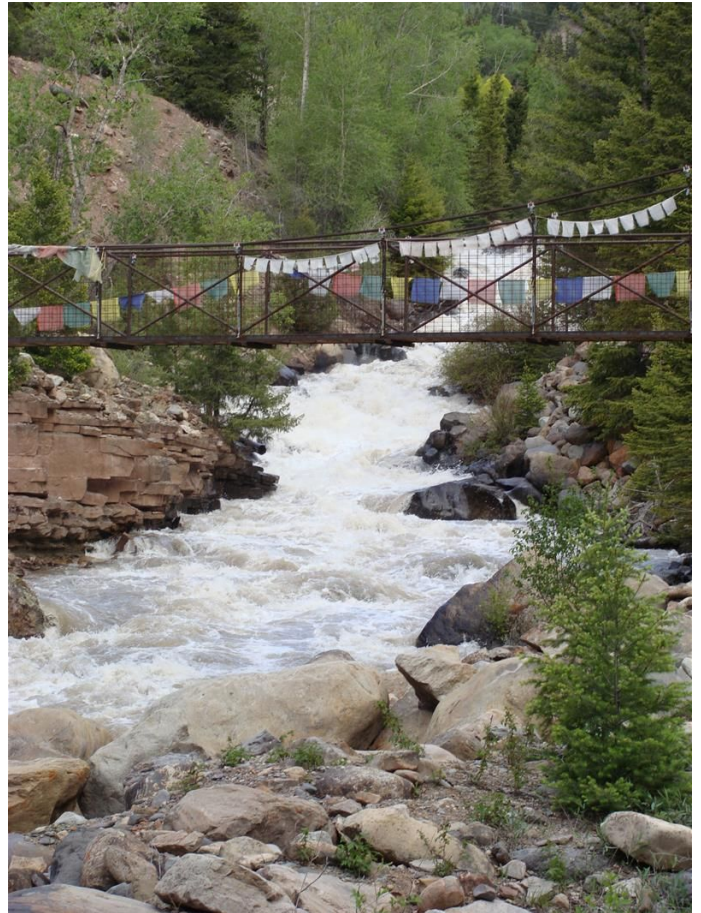
¹⁸ Stafford and McCutchen, Whitewater, 136

- Additional Comments: In addition to this segment of the East River, we support Eligibility on the entire segment from the headwaters at Emerald Lake to the USFS Boundary for additional ORVs of Scientific Research, Scenery, Ecological, and Geological (see High Country Conservation Advocates’ comments).
- Additional Resources:
 - AW River Inventory Page/Photo Gallery: [Upper East](#)
 - Media:
 - <https://vimeo.com/129999464>
 - <https://www.youtube.com/watch?v=F5r97FRPTvc>

Uncompahgre National Forest

1. San Miguel (Keystone Canyon and Sawpit)¹⁹

- Recommendation: *The San Miguel should be found eligible, Recreation ORV, Recreation Classification*
- Tributary of: Dolores River
- Keystone to FS-BLM boundary
- Free-flowing: *Yes*. This segment of the San Miguel river is free-flowing with no impoundments or made made structures.
- ORVs:
 - *Recreation*. Keystone Canyon has been described as the best creekboating option in the area, providing a class V- to V+ boating experience unlike anywhere else in the San Miguel drainage.²⁰ Keystone Canyon starts 3.5 miles downstream of Telluride and ends at the Bilk Creek access point. Downstream of Bilk Creek is a Class II-III stretch of river frequently described as having quality whitewater and incredibly scenic views²¹.
- Additional Comments: This segment abuts the BLM segment of the San Miguel (27.2 miles from the USFS boundary near Lime to downstream of Norwood), which was



¹⁹ Photo retrieved from <https://www.sanmiguelcountyco.gov/197/Parks-Open-Space>

²⁰ Stafford and McCutchen, Whitewater, 202.

²¹ <https://westerncooutdoors.com/archives/3002>

determined to be Eligible (and Suitable) by the BLM Uncompahgre Field Office²². This segment of the San Miguel River is the longest segment within the USFS boundary and also the most scenic and unique.

- Classification: *Recreational*. Sections of the San Miguel River are paralleled by Highway 145 and the river is intersected by CR 63L.
- Additional Resources:
 - AW River Inventory Page: [San Miguel Box](#)

2. Uncompahgre River (Uncompahgre Gorge)

- Recommendation: *The Uncompahgre River should be found eligible, Recreation & Scenery ORVs, Scenic Classification*
- Tributary of: Gunnison River
- Red Mountain Creek to Ouray Ice Park
- Free-flowing: *Yes*. There is a small diversion at the end of this segment in the Ouray Ice Park (Ice Box Canyon), however the segment itself is free of diversions and impoundments and is free-flowing.
- ORVs: We agree with the ORVs identified by the District Review, including Recreation, Scenery, and Geology. We expand on the Recreation ORV below.
 - *Recreation*. From Red Mountain Creek to the Ouray Ice Park, the Uncompahgre Gorge offers challenging Class IV-V whitewater in an incredibly scenic gorge. This is the most challenging section of the Uncompahgre River, as well as the most remote. The canyon walls within the Uncompahgre Gorge are among the tightest in Colorado (see photo).
- Additional Comments:



- The Draft Evaluation cites incorrect reasoning for ineligibility on this segment. The “WSR Review Notes” indicate that more information is needed regarding land ownership, water quality, highway impacts, etc. However, these factors are outside the scope of Eligibility and should not be considered at this time.
- The District Review identified ORVs of Recreation, Scenery, Geology, and Heritage and advocated for Eligibility determination on multiple occasions. These valid insights from the local District Review team and from public comment should inform the Eligibility determination.
- Classification: *Scenic*. The Uncompahgre Gorge is set back from the road system as it flows through the gorge, although it is paralleled by Highway 550 and the end of the segment runs through the Town of Ouray and the Ouray Ice Park. Between the put-in and the Ouray Ice Park there are no road or trail intersections and the river is free of impoundments within the segment identified.
- Additional Resources:
 - AW River Inventory Page/Photo Gallery: [Uncompahgre Gorge](#)

3. Uncompahgre River (Ouray to KOA CG)

- Recommendation: *The Uncompahgre River should be found eligible, Recreation ORV, Recreational Classification*
- Tributary of: Gunnison River
- Town of Ouray to KOA CG: 2.2 miles
- Free-flowing: *Yes*. This segment of the Uncompahgre is free-flowing in its entirety.
- ORVs:
 - *Recreation*. From Ouray to the KOA CG downstream of town, the Uncompahgre



provides a popular and challenging class IV-V paddling stretch known to the locals as the Quality Quickie. This segment has been in the guide books since 1995²³ and continues to grow in popularity; Whitewater of the Southern Rockies²⁴ gives it a 4-star rating.

²³ Banks and Eckardt, Colorado Rivers, 139.

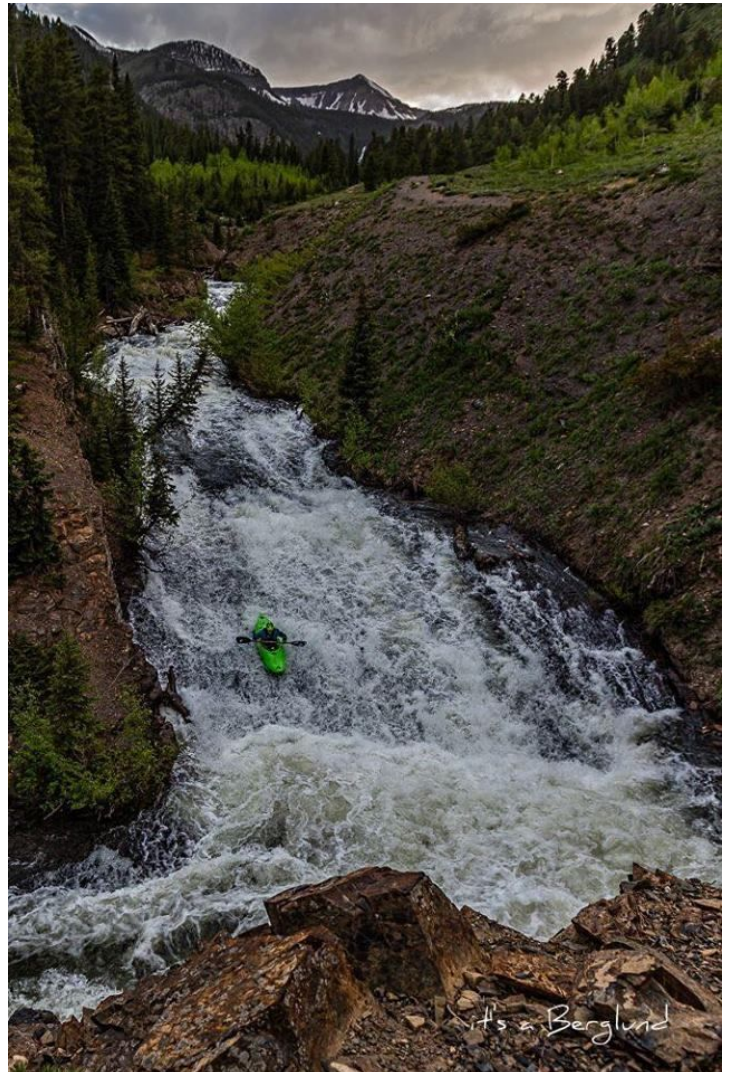
²⁴ Stafford and McCutchen, Whitewater, 538.

- Classification: *Recreation*. Although it is set back from the road, this segment is paralleled by Highway 550 and accessible at multiple points. This stretch is free of impoundments and diversions.
- Additional Resources:
 - AW River Inventory Page: [Ouray to KOA CG](#)
 - Media:
- <https://vimeo.com/99315827>

Support for Draft Eligibility Findings:

1. Oh-Be-Joyful Creek (1B)²⁵

- Recommendation: *Oh-Be-Joyful Creek (1B) should be found eligible, Recreation ORV, Scenic Classification*
- Tributary of: Slate River
- Length: 1.66 miles
- Free-flowing: *Yes*.
- Classification: *Scenic*. Classification should be changed from Recreational to Scenic. Segment 1B is free of impoundments and manmade structures. The segment is paralleled by a hiking trail and a dirt road, but motorized access has been prohibited here.
- ORVs:
 - *Recreation*. We concur with the Recreation ORV for kayaking. Oh-Be-Joyful provides a unique kayaking experience on the Western Slope and attracts visitors from across the state and the nation. Since 1995, OBJ has hosted an annual kayak competition - the steepest kayak race in the country. In addition to a series of 12' to 25' waterfalls, OBJ has numerous challenging slides (see photo). OBJ has been recognized in numerous guidebooks for being visually spectacular²⁶, having exceptionally clean lines²⁷, a 5-star rating²⁸, and as “king of the Colorado steeps”²⁹.
- Additional Resources:
 - AW River Inventory Page/Photo Gallery: [Oh-Be-Joyful](#)
 - Media:
 - [Kayak Session Video](#); [Race History](#); [2019 Race Event](#); [Yeti Gone Crazy Blog](#)



²⁵ Photo credited to Matt Berglund Photography

²⁶ Banks and Eckardt, Colorado Rivers, 162

²⁷ Ibid. 162

²⁸ Stafford and McCutchen, Whitewater, 130

²⁹ Davis, L., and Davis A. The River Gypsies' Guide to North America. USA, (Brushy Mountain Publishing, 2010), 206.

2. San Miguel Segment 1

- Recommendation: *San Miguel Segment 1 should be found eligible, Recreation & Scenery ORVs, Recreation Classification*
- Tributary of: Dolores River
- Length: 0.08 miles
- Free-flowing: *Yes*. This segment of the San Miguel meets the requirements for free-flowing.
- ORVs:
 - *Recreation*. We agree with the Recreation ORV for paddling on this segment of the San Miguel. This segment is part of the popular class II-III paddling stretch between Specie Creek and Beaver Creek.
 - *Scenery*. We agree with the Scenery ORV for this segment. This stretch abuts the Uncompahgre Plateau and provides unique views of the plateau.
- Classification: *Recreational*.
- Additional Resources:
 - AW River Inventory Page: [San Miguel River Specie to Beaver Creek](#)

3. San Miguel Segment 2

- Recommendation: *San Miguel Segment 2 should be found eligible, Recreation & Scenery ORVs, Wild Classification*
- Tributary of: Dolores River
- Length: 0.37 miles
- Free-flowing: *Yes*. This segment of the San Miguel meets the requirements for free-flowing.
- ORVs:
 - *Recreation*. Agree with the Recreation ORV for paddling on this segment. It is part of the popular and scenic class III paddling stretch known as Norwood Canyon. People travel from around the state to commercially raft this stretch of river.
 - *Scenery*. Agree with the Scenery ORV for this segment. This segment has been described as a “largely roadless, wooded canyon” and provides a very unique opportunity to experience a transition in landscapes between the alpine environment of Telluride to the desert environment of Naturita³⁰.
- Classification: *Wild*. We agree with the preliminary classification of Wild.
- Additional Resources:
 - AW River Inventory Page: [Beaver Creek to Piñon Bridge](#)

³⁰ Banks and Eckardt, Colorado Rivers, 124-125

Thank you for considering our comments on the GMUG's Draft Wild and Scenic Eligibility Evaluation. Please reach out to us with any questions on the comments we have provided here. American Whitewater staff would be happy to meet with USFS staff in person to discuss the information provided here and answer any additional questions. We look forward to reviewing the Final Wild and Scenic Eligibility Evaluation.

The comments herein have been submitted in association with our partners at Outdoor Alliance and the Telluride Mountain Club.

Louis Geltman
Policy Director, Outdoor Alliance



Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and Snowscapes.

Heidi Lauterbach
Director, Telluride Mountain Club

The Telluride Mountain Club's mission is to advocate for safe, accessible, enjoyable and respectful opportunities for human-powered recreational activities in the Telluride region, through education, awareness and collaboration.



Sincerely,

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