



March 20, 2019

Grand Mesa, Uncompahgre, and Gunnison National Forests
2250 Highway 50
Delta, CO 81416

The Colorado Department of Agriculture (CDA) submits the following comments regarding the Draft Wild and Scenic Rivers Eligibility Report for the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) Forest Plan.

CDA's mission is to strengthen and advance Colorado agriculture; promote a safe and high-quality food supply; protect consumers; and foster responsible stewardship of the environment and natural resources. It is with this mission in mind that we provide comments to the scoping materials that provide the foundation for the Forest Plan revision.

Current Eligibility Evaluation

The CDA would like to applaud the effort to compile and evaluate the many miles of waterways with in the GMUG planning area.

After a detailed examination of the listed segments in the Eligibility report, CDA was able to see that of the 111 miles of river segments, 35 miles are **not** within existing Special Management Areas (SMA). For the 76 miles within existing SMA, 45 miles are within designated Wilderness and 32 miles are within the Tabeguache and Roubideau Special Management Areas.

The small segments (1/2 mile) along the San Miguel River are surrounded and bordering the BLM's San Miguel Area of Critical Environmental Concern. CDA would support extending the BLM ACEC protections to incorporate the small parcels on USFS land. This coordination would ensure continuity of management strategies that are specific to the San Miguel River corridor.

The Kelso/North Fork Escalante Creek watershed segments account for 29 miles, which are the majority of the river segments that do not have special designations. This section is the headwaters to Escalante Creek. The segments ultimately leave USFS property and enters the BLM Dominquez-Escalante NCA where it confluences with the greater Gunnison River.

The remaining 6 miles of river segments should be evaluated on the overall protections of the watershed. If accessed in this manner the majority of these watersheds are currently managed to the highest level of protections (i.e. Wilderness) in the SMA system.



Livestock Grazing

During the review, CDA observed eligible river segments are within multiple active allotments. CDA would like to stress the importance of water access that supports grazing activities. The potential to exclude these water sources without proper evaluation could have negative effects on grazing distribution and the stewardship within these allotments.

Soap Creek - 00927
Slate River – 00925
Gothic - 00915
Club/Campbell Point – 00202
Musser – 00213
Basin C&H – 00503
Forty-Seven C&H – 00507
Green Mountain – 00613
Kelso – 00619
Boyden/Monitor – 00620
Roubideau - 00625

Thank you for the opportunity to provide input on this important matter. CDA looks forward to participating as a cooperating agency as the plan is developed and analyzed. Contact Mr. Adam Ortega at 303-869-9094 or Adam.Ortega@state.co.us for questions about these comments.

Sincerely,



Kate Greenberg
Commissioner