



July 26, 2019

Feedback:

**Grand Mesa-Uncompahgre-Gunnison National Forest
Working Draft Forest Plan Revision**

Plan Revision Team
2250 South Main Street
Delta, Colorado 81416
gmugforestplan@fs.fed.us

Thank you very much for the opportunity to review the Working Draft Plan for the Grand Mesa-Uncompahgre-Gunnison National Forest land and resource management plan revision.

While we note that the working draft plan does not include any new information or decisions regarding potential wild & scenic rivers, we take this opportunity to again commend to you comments we submitted March 16 regarding the *GMUG Draft Wild and Scenic Rivers Eligibility Evaluation*.

The final wild & scenic eligibility evaluation and determinations should reflect the recommendations we included in those earlier comments. A brief summary of our comments includes:

- All streams that meet the basic eligibility requirements in the *Wild and Scenic Rivers Act*—free-flowing stream with at least one outstandingly remarkable value—should be found eligible.

- Regions of comparison used in wild & scenic eligibility determinations should be employed carefully, ensuring that eligibility protections are provided for all streams and their related values that are important to the ecological and hydrological health of the GMUG itself.

- Supplemental information should be considered only in the context of wild & scenic eligibility standards—free flowing and outstandingly remarkable value(s). Factors such as potentially competing uses or development, comparison of alternative means of protection, non-federal management plans or preferences, costs of management, support for or opposition to designation, *etc.* would be considered only in the context of a wild & scenic rivers suitability determination, and they are not appropriate considerations during eligibility evaluation.

- All stream segments included in the draft wild & scenic eligibility evaluation should be found eligible in the final document:

- Oh-be-joyful Creek and tributaries
- West Elk Creek
- West Soap Creek
- Copper Creek and tributaries
- Roubideau Creek and tributaries
- Tabeguache Creek and North Fork
- San Miguel River
- North Fork Escalante Creek and Kelso

• In addition, streams previously found wild & scenic eligible should retain their eligibility until and unless the Forest formally reconsiders that eligibility, presents detailed evidence of changed circumstances that have occurred relative to those streams, and provides opportunity for public review and comment on those asserted changes:

- Slate River
- East River
- Lower Taylor River
- Escalante Creek
- Bear Creek
- Bridal Veil Creek (falls)
- Ingram Falls

• Additional uniquely qualified streams not included in the draft wild & scenic eligibility evaluation should be added for evaluation and should be found eligible:

- Monitor Creek
- Potter Creek
- Cottonwood Creek
- Beaver Creek
- Fall Creek
- Horsefly Creek

Details regarding each of these streams, and our recommendations for their wild & scenic eligibility, are included in our March 16 comments. We are pleased to discuss or otherwise clarify those details if and whenever useful to you.

Thank you very much again for this opportunity to reinforce the importance of establishing the greatest possible number of wild & scenic-eligible streams as part of the formal draft forest plan and final forest plan revision.

Fay Hartman,
 Conservation Director, Colorado Basin Program
American Rivers

American Rivers protects wild rivers, restores damaged rivers, and conserves clean water for people and nature. Since 1973, American Rivers has protected and restored more than 150,000 miles of rivers through advocacy efforts, on-the-ground projects, and an annual America's Most Endangered Rivers campaign. American Rivers has offices across the country with over 275,000 members, supporters, and volunteers.

American Rivers
 1536 Wynkoop, Suite 321
 Denver, Colorado 80202