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Doug Vilsack, State Director
Bureau of Land Management, Colorado State Office
Thompson Divide Withdrawal Project
2850 Youngfield Street, Lakewood, Colorado 80215
Via email at: BLM_CO_Thompson_Divide@blm.gov

Chad Stewart, Forest Supervisor
GMUG National Forest
2250 Highway 50
Delta, CO 81416
Via email at: chad.stewart@usda.gov

Re: Support for the Proposed Thompson Divide and Mt. Emmons Mineral Withdrawal

Dear State Director Doug Vilsack,

Thank you for the opportunity to comment on the proposed mineral withdrawal for the Thompson Divide and Mt. Emmons areas. These landscapes and their watersheds are important to American Whitewater and our constituents and we are invested in ensuring that the Thompson Divide and Mt. Emmons areas are withdrawn from mining and protected for future generations of people and wildlife. We ask that the Department of Interior act expeditiously to complete the administrative mineral withdrawal process and to protect these important landscapes for the next 20 years.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with over 6,000 members and 100 local-based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. The organization is the primary advocate for the preservation and protection of whitewater rivers throughout the United States and connects the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within its mission. Our vision is that our nation's remaining wild and free-flowing rivers stay that way, our developed rivers are restored to function and flourish, that the public has access to rivers for recreation, and that river enthusiasts are active and effective river advocates.

In addition to American Whitewater's below comments, we have also signed on to support comments submitted by High Country Conservation Advocates, et al. Our organizational comments here are

complementary and focus on the benefits that the mineral withdrawal will have on healthy watersheds and river recreation opportunities within the boundaries and the surrounding region.

Benefit for Rivers

American Whitewater fully supports the mineral withdrawal for approximately 224,793.73 acres, including the entire Thompson Divide area and the area surrounding Mt. Emmons. Both of these areas are the headwaters of, or tributaries to, rivers that have high recreational value and are cherished by the paddling community. Within the withdrawal area includes very special creeks that have paddling opportunities including, Oh Be Joyful Creek, Ruby Fork of the Anthracite, Anthracite Creek, the North Fork of the Gunnison, the Crystal River, and the Roaring Fork River. The area also includes many tributaries to these rivers and the proposed mineral withdrawal will have far reaching benefits on entire watersheds.

Oh Be Joyful Creek

Oh Be Joyful Creek 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, Oh Be Joyful Creek has numerous challenging slides. The Creek has been recognized in numerous guidebooks for being visually spectacular¹, having exceptionally clean lines², a 5-star rating³, and as “king of the Colorado steeps”.⁴ It originates on the northeast side of Mt. Emmons and parts of the creek have been degraded by historical mining activity. Including this watershed in the mineral withdrawal will allow the Creek and its tributaries to recover and be protected for future generations.

Ruby Fork of the Anthracite and Anthracite Creek

The Ruby Fork of the 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. Both the Ruby Fork and the Anthracite River have been recognized in paddling guide books since 1995 and described as wilderness in character with incredible scenery.⁵

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 Ruby Fork, Marcellina is viewed on the left and

¹ Banks and Eckardt, *Colorado Rivers*, 162

² *Ibid.* 162

³ Stafford and McCutchen, *Whitewater*, 130

⁴ Davis, L., and Davis A. *The River Gypsies' Guide to North America. USA*, (Brushy Mountain Publishing, 2010), 206.

⁵ *Banks, G. and Eckardt, D. Colorado Rivers and Creeks. Hong Kong, (Dave Eckardt and Gordon Banks, 1995), 145.*

shear cliff walls close you in on the right. The scenery, recreation, and wildlife that these creeks provide will be further enhanced and protected by the mineral withdrawal.

North Fork of the Gunnison

The North Fork of the Gunnison River begins at the confluence of Anthracite and Muddy Creeks, below Paonia Reservoir. The river flows from the north side of Kebler Pass through Paonia until it reaches the main stem Gunnison River near Delta. When the river has sufficient flows, it provides whitewater boating opportunities and is a key tributary to the Gunnison and Colorado Rivers downstream. There are significant efforts underway to remove or retrofit a series of low head dams for safe recreational navigation and fish passage. Further protecting the headwaters of the North Fork will help elevate this river as a river recreation destination and will complement efforts to improve the health of the fishery in the North Fork.

Crystal River

The Crystal River in the White River National Forest is one of Colorado's last remaining free-flowing rivers and the western side of the watershed is included in the proposed mineral withdrawal. Within the withdrawal boundary, there are four different river segments that residents and visitors seek out for whitewater kayaking, canoeing, paddle boarding, and rafting, ranging from beginner to expert in difficulty.⁶ In addition to world class paddling opportunities, people come to the Crystal River to fish, picnic, camp, ice climb, and many other activities that are dependent upon the river and its healthy ecosystems and beautiful scenery. The mineral withdrawal would help protect the water quantity and quality in the Crystal River and its western tributaries and preserve the scenery that make the Crystal watershed so special.

Roaring Fork River

A small portion of the Roaring Fork River near Carbondale, CO would be included in the mineral withdrawal, including many of the river's southwestern tributaries. This family friendly section of the Roaring Fork attracts a variety of people who come to float the river, gain and practice river skills, and fish. The Roaring Fork is emblematic of the communities and the entire valley between Glenwood Springs and Aspen. This section of river contains the fewest rapids and instream hazards that make other reaches of the Roaring Fork out of reach for beginner recreationists, students, and families. Organizations like the Roaring Fork Kayak Club use this reach for instruction. Ensuring that the mountainous landscape surrounding the Roaring Fork River is intact and that the water quality in the watershed is protected will help preserve both the human and wildlife communities of the Roaring Fork Valley.

Boundary Adjustments

American Whitewater supports the mapping changes that have been proposed in public comments submitted by High Country Conservation Advocates, et al. The mineral withdrawal must not include the area of the Mt. Emmons Land Exchange. As currently proposed, 85 acres of the Mt. Emmons Land Exchange are located within the mineral withdrawal boundary. The boundaries should be corrected to clearly separate the two different landscapes in order to ensure that the land exchange and the mineral

⁶ <https://www.americanwhitewater.org/content/River/state-summary/?state=CO>

withdrawal are not in conflict with each other. In addition, two small boundary adjustments should be made to include the entire Standard Mine Superfund Site⁷ and the Mt. Emmons Iron Fen⁸.

Complimentary Protections

The proposed mineral withdrawal, with the above boundary adjustments, will complement and support other federal and state river protections in the area.

In the ongoing Grand Mesa, Uncompahgre, and Gunnison National Forest plan revision process, the Draft Plan determined Oh Be Joyful Creek and Anthracite Creek as Eligible for Wild and Scenic River status.⁹ In 2002, the White River National Forest determined that four different segments of the Crystal River were determined Eligible for Wild and Scenic River status, with Outstandingly Remarkable Values including recreation, scenery, and historical.¹⁰ Taking measures to protect these Eligible rivers and their surrounding watersheds from the impacts of future mining will help manage for their free-flow nature and protect their identified Outstandingly Remarkable Values by the Forest Service. Additionally, the withdrawal is in line with Clean Water Act and Colorado state water quality standards and protections for numerous rivers within the boundary, including Oh Be Joyful Creek, Ruby Fork and Anthracite Creek, the headwaters of Thompson Creek, and many others.¹¹ Finally, in addition to existing protections in these watersheds, there are active local campaigns working to secure additional protections for the Crystal River and other rivers in the withdrawal area. Securing a 20 year mineral withdrawal across this landscape will bolster local efforts to protect the area through other complementary measures.

Thank you for considering our comments in support of the mineral withdrawal for the Thompson Divide and Mt. Emmons areas. Protecting these landscapes for the next 20 years will allow ecosystems to flourish and support a robust outdoor recreation economy on the Western Slope of Colorado.

Sincerely,



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⁷<https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Cleanup&id=0801669#bkground>

⁸ <https://www.fs.usda.gov/detail/r2/home/?cid=fseprd558217>

⁹ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd939801.pdf

¹⁰ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5286435.pdf

¹¹ <https://cdphe.maps.arcgis.com/apps/Viewer/index.html?appid=03b24116b8fd43cfa83999365ce56ab3>