

Data Submitted (UTC 11): 3/19/2019 6:00:00 AM

First name: steve

Last name: smith

Organization:

Title:

Comments: comments: gmug wild & scenic eligibility

Hello. Thank you very much for the opportunity to submit detailed comments on the GMUG National Forest Draft Wild & Scenic Eligibility Evaluation.

Please carefully consider these comments, and the changes they propose, in preparing your final eligibility determinations.

Please let us know if we can clarify any details or otherwise be of help in your work on this important review.

Thank you again.

Steve Smith

Glenwood Springs, Colorado for American Rivers

ssmith@rof.net

(970) 618-8264

American Rivers

Defenders of Wildlife [bull] Great Old Broads for Wilderness Rocky Mountain Wild [bull] San Juan Citizens Alliance

San Luis Valley Ecosystem Coalition [bull] Sheep Mountain Alliance Western Environmental Law Center [bull] The Wilderness Society Western Colorado Alliance [bull] Wild Connections

c/o American Rivers 1536 Wynkoop, Suite 321

Denver, Colorado 80202

(303) 454-3395 or (970) 618-8264

March 19, 2019

Comments:

Grand Mesa-Uncompahgre-Gunnison National Forest Draft Wild & Scenic Eligibility Evaluation

Plan Revision Team 2250 South Main Street Delta, Colorado 81416

gmugforestplan@fs.fed.us

(submitted in both printed and electronic format) Greetings,

The undersigned organizations respectfully offer for your careful consideration the following substantive comments on the Draft Grand Mesa, Uncompahgre, and Gunnison National Forest Draft Wild and Scenic Rivers Eligibility Evaluation.

We very much appreciate this opportunity to provide our information and proposals. We also congratulate the GMUG National Forest staff on its careful attention to detail and professional presentation of the eligibility review process.

All the streams listed below[mdash]including those in the draft eligibility evaluation and an additional thirteen streams that we recommend for careful study[mdash]should be found wild & scenic eligible, with resulting administrative protection for this unique array of potential wild & scenic rivers.

#### Introduction and study format

The Grand Mesa-Uncompahgre-Gunnison National Forest (GMUG) includes numerous natural-condition streams that may well warrant protection under the provisions of the Wild and Scenic Rivers Act of 1968 (P.L. 90-542: 16 U.S.C. 1271-1287).

Those streams variously provide essential habitat for riparian vegetation, including rare plant communities; habitat for diverse wildlife, including big game, birds, rare and common fish species, invertebrates, and insects, all essential to the dynamic ecological health of the forest; the aquatic essence and geological carving of designated wilderness areas and of other specially designated lands; clean water for municipal and agricultural uses; unique recreation opportunities; and inherent scenic and natural values.

As affirmed in the GMUG Draft Wild and Scenic Rivers Eligibility Evaluation (February 2019), the Forest Service is required by that Act to consider, as part of the current overall forest plan revision process, the wild & scenic potential of streams on the forest. We appreciate the corresponding careful attention that the Forest has given to at least some of the GMUG streams that may qualify as wild & scenic- eligible.

Since the new forest plan will provide important administrative protective management for streams and stream-related values like those described above, once they are found to be eligible, it is essential that every qualified stream be included in that eligible status. Emphasis in the wild & scenic eligibility review should be placed on inclusion rather than on seeking reasons for exclusion.

Since that protective management will endure for perhaps two decades or longer (the life of the forest plan), this is a rare opportunity for eligibility review. The review must therefore be very thorough and the resulting list of eligible rivers complete.

#### Standards for eligibility

In conducting that careful review, it is important to note that the Wild and Scenic Rivers Act's standards for eligibility are quite straightforward: "A wild, scenic or recreational river area eligible to be included in the system is a free-flowing stream and the related adjacent land area that possesses one or more of the values referred to in Section 1, subsection (b) of this Act..." (Section 2(b)).

The corresponding list of values (in Section 1) to be considered in determining eligibility are "outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values..."

More simply stated, there really are just three components of eligibility, two of them objective, a third somewhat more subjective. First, an eligible stream segment must be free-flowing; second, the stream area must contain at least one value from the list above; third, the value or values must be "outstandingly remarkable".

The Forest Service Handbook provides guidance for that third, necessarily more subjective assessment of the outstandingly remarkable nature of a stream-area value, instructing that such value(s) must be river-related and "...must be a unique,

rare, or exemplary feature that is significant when compared with similar values from other rivers at a regional or national scale..." (FSH 1909.12, Chapter 80, 82.73).

The same section of the handbook also allows the Forest to determine a "region of comparison" and to consult information from other sources. Since those comparisons and consultations themselves can invite further subjectivity and conflicting opinions, the Forest should select a region of comparison, and consider supplemental information, in a manner that gives the benefit of any doubt to finding a particular stream eligible.

#### Regions of comparison

The regions of comparison listed in the draft eligibility report should be used with careful circumspection, and perhaps adjusted, to properly evaluate the rare, unique, and exemplary nature of river-related values of streams in the GMUG. Use of regions of comparison should be flexible in order to err on the side of finding streams eligible, lest key values lose recognition and protection.

Determinations whether river-related values are outstandingly remarkable, whether in a forest context or regional context, should be based on the importance of streams and their related values to the ecological and hydrological health of the GMUG itself.

#### Supplemental information

Consideration of supplemental information provided by other governmental entities or from the public must be applied only on the two essential standards for measuring eligibility—free flowing condition and presence of at least one outstandingly remarkable value (FSH 1909.12, Chapter 80, 81.2).

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 (FSH 1909.12, Chapter 80, 83.2 and 83.3).

We support the Forest's decision not to pursue a wild & scenic suitability evaluation as part of the current forest plan revision (GMUG draft w&s eligibility evaluation, page 1).

#### Presentation format

The draft eligibility evaluation document includes helpful and general narrative information about the streams included. It falls short, however, in visual details.

The single composite map showing relative and very generalized locations of the study rivers does not put the individual stream segments into geographic context, nor does it present what would be helpful particulars of physical features, segment termini, ownership boundaries, and existing land-management designations.

The report would be greatly improved with the inclusion of individual narrative chapters describing particulars of (and information sources for) the river-related values being evaluated, along with a geographic map for each stream segment.

#### Rivers to be considered for eligibility

The draft eligibility evaluation describes a valuable list of sources for listing streams to be evaluated: past river inventories, including the 1983 and 2001-2007 GMUG evaluations; rare-species information (U.S. Fish and Wildlife Service e.g.); adjacent federal land-management units; Nationwide Rivers Inventory; and U.S. Geological Survey maps.

In addition, the Forest should consider stream and habitat information that may be available from State of

Colorado's Natural Heritage Program data and Colorado Natural Areas Program land identifications. We have included some information from those valuable sources in our stream-specific comments below.

We appreciate the inclusion in the draft evaluation of 30 stream segments (in 9 river/watershed contexts). We especially acknowledge the inclusion of 18 stream segments that had not been previously studied for eligibility.

However, the draft evaluation fails to include many other streams that should be studied.

Streams included in draft, beginning on page 6

The draft eligibility report includes consideration of a valuable and well-researched set of candidate streams, and we support evaluation of all those streams:

- [bull] Oh-be-joyful Creek and tributaries, page 6

- [bull] West Elk Creek, page 7

- [bull] West Soap Creek, page 8

- [bull] Copper Creek and tributaries, page 8

- [bull] Cow Creek and tributaries, page 10

- [bull] Roubideau Creek and tributaries, page 11

- [bull] Tabeguache Creek and North Fork, page 14

- [bull] San Miguel River, page 16

- [bull] North Fork Escalante and Kelso, page 18

We appreciate the Forest's detailed research, engagement of a thorough and well-grounded set of external sources, and careful internal deliberations in selecting those stream segments for study.

We agree with the findings of wild & scenic eligibility for all the stream segments included in the draft eligibility evaluation.

Streams previously found eligible but not included in draft, beginning page 21 All streams previously found wild & scenic eligible must retain their eligibility until and unless the Forest formally reconsiders that eligibility,

presents detailed evidence of changed circumstances that have occurred relative to those eligible streams, and provides opportunity for public review and comment on those asserted changes (FSH 1909.12, Chapter 80, 82.2).

The draft eligibility evaluation includes no such documentation of stream-specific changed circumstances on the following streams (found eligible in 2005), or of other reasons for not including them in the current draft evaluation. Such information must be presented for public review and comment before the Forest makes any decisions regarding the existing eligibility of these streams.

[bull] Slate River, page 21

[bull] East River, page 21

[bull] Lower Taylor River, page 22

[bull] Escalante Creek, page 23

[bull] Bear Creek, page 25

[bull] Bridal Veil Creek (falls), page 26

[bull] Ingram Falls, page 26

The Forest Service Handbook allows consideration of changed circumstances on already-eligible streams (FSH 1909.12, Chapter 80, 82.4), and the draft eligibility evaluation does assert, in a generalized fashion, that some changed circumstances have occurred regarding species presence and classifications, cutthroat trout, boreal toad, and global and state plant species rankings— all compelling considerations.

However, the draft evaluation fails to explain and document how such changes may have affected any particular streams found eligible in 2005. Without more detailed explanation of effects—or other justification for not retaining all of the 2005 eligibility findings—those existing eligibilities must be carried forward and incorporated into the revised forest plan.

We present evidence below supporting continuing eligibility for each of the streams listed above, either continued from 2005 or to be affirmed in the current eligibility evaluation.

Other streams not included in draft, beginning on page 27

The GMUG is, of course, a very large geography with highly diverse landscapes, stream-related landforms, and types of riparian habitats. Intuitively, it seems incongruous that, out of perhaps 900 USGS-named stream segments, for example, only 30—roughly 3% of total number, perhaps 5% of total stream miles—are

included in the draft eligibility evaluation.

More specifically, and based in a combination of on our own field data and review of diverse resource studies and documentation, we specifically recommend that the

following additional streams and stream segments be evaluated for wild & scenic eligibility. Each of these streams should then be found eligible.

[bull] Monitor Creek, page 27

[bull] Potter Creek, page 28

[bull] Cottonwood Creek, page 29

[bull] Beaver Creek, page 29

[bull] Fall Creek, page 30

[bull] Horsefly Creek, page 31

In addition, the undersigned commend to you separate comments expertly prepared by High Country Conservation Advocates (HCCA). Those comments thoroughly and compellingly document the free-flowing condition and presence of outstandingly remarkable values—that is, wild & scenic eligibility—for at least ten additional stream segments. The Forest should carefully analyze, as part of an expanded wild & scenic eligibility evaluation, all of the streams included in the HCCA comments.

Stream-specific comments on segments included in draft eligibility evaluation all streams should be found eligible

We generally endorse the Forest's documentation and findings regarding the river- related values and preliminary classification of 30 stream segments included in the draft eligibility evaluation. All streams in the draft evaluation are, of course, free- flowing. The Forest has correctly identified outstandingly remarkable values for each of these streams; in some cases, the list of values is incomplete and should be expanded to more fully recognize the values that contribute to eligibility—and to ensure that all those values are addressed in subsequent administrative protective management.

Oh-be-joyful Creek, Blue Lake tributary, and Dippold Basin tributary

6.56 miles, classification wild, outstandingly remarkable value scenery

The streams' unique features and surround geology, along with long-distance views available from within the stream corridors, are astounding.

The stream segments lie inside the Raggeds Wilderness and include no impoundments, structures, or constructed routes. They therefore qualify for wild classification.

Oh-be-joyful Creek, Blue Lake tributary, and Dippold Basin tributary should be found eligible.

Oh-be-joyful Creek

1.66 miles, classification recreational, outstandingly remarkable value recreation

The segment's unique and challenge river recreation opportunities are almost beyond compare. The Forest should consider adding ORV for scenery.

The segment includes no impoundments, structures. It is paralleled by a trail and unpaved road. Preliminary classification should therefore be changed to scenic.

Oh-be-joyful Creek should be found eligible.

Peeler Basin tributary to Oh-be-joyful Creek

2.26 miles, classification wild, outstandingly remarkable value scenery

The segment's scenic features, seasonally colorful vegetation, and powerful stream dynamics provide a striking visitor's experience.

The segment lies inside the Raggeds Wilderness and includes no impoundments, structures, or heavily maintained routes; the stream is paralleled by a low-impact hiking trail. It therefore qualifies for wild classification.

Peeler Basin tributary to Oh-be-joyful Creek should be found eligible.

Redwell Basin tributary



1.17 miles, classification recreational, outstandingly remarkable values botanical/vegetation

In addition to stunning scenery, the stream's corridor supports unique fen plant communities, including imperiled species.

The segment includes no impoundments, structures, or heavily maintained routes. The Forest should consider changing the preliminary classification to scenic.

Redwell Basin tributary should be found eligible.

#### West Elk Creek

15.74 miles, classification wild, outstandingly remarkable values scenery, geology

West Elk Creek is an outstanding showpiece stream, emblematic of the purposes and vision of the Wild and Scenic Rivers Act, anchoring and helping a major landscape within the West Elk Wilderness. Dramatic canyon-wall formations and plunging sections of the creek vividly demonstrate the dynamic forces of nature.

The creek lies almost entirely within the West Elk Wilderness and includes no impoundments, structures, and only short sections of low-impact trail. It therefore qualifies for wild classification.

West Elk Creek should be found eligible.

#### West Soap Creek

2.83 miles, classification wild, outstandingly remarkable values scenery, geology

Few mountain canyons compare to the powerfully carved walls and twists of this stream.

West Soap Creek lies entirely within the West Elk Wilderness, with no structures, impoundments, or significant routes. It therefore qualifies for wild classification.

West Soap Creek should be found eligible.

#### Copper Creek

3.32 miles, classification wild, outstandingly remarkable values wildlife

This critical boreal toad habitat is important for helping that imperiled species to thrive but also necessarily includes the unique and subtle beauty of marshlands and low-profile vegetation that composes that habitat.

Cooper Creek lies almost entirely within the Maroon Bells Snowmass Wilderness and includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification.

Copper Creek should be found eligible.

#### Copper Lake tributary

.59 mile, classification wild, outstandingly remarkable value wildlife

This critical boreal toad habitat is important for helping that imperiled species to thrive but also necessarily includes the unique and subtle beauty of marshlands and low-profile vegetation that composes that habitat.

Cooper Lake tributary lies entirely within the Maroon Bells Snowmass Wilderness and includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification.

Copper Lake tributary should be found eligible.

#### Triangle Pass tributaries to Copper Creek

2.2 miles, classification wild, outstandingly remarkable value wildlife

This critical boreal toad habitat is important for helping that imperiled species to thrive but also necessarily includes the unique and subtle beauty of marshlands and low-profile vegetation that composes that habitat.

Triangle Pass tributaries lie entirely within the Maroon Bells Snowmass Wilderness and include no impoundments, structures, or constructed routes. They therefore qualify for wild classification.

Triangle Pass tributaries should be found eligible.

Copper Creek tributaries

1.44 miles, classification wild, outstandingly remarkable value wildlife

This critical boreal toad habitat is important for helping that imperiled species to thrive but also necessarily includes the unique and subtle beauty of marshlands and low-profile vegetation that composes that habitat.

Cooper Creek tributaries lie entirely within the Maroon Bells Snowmass Wilderness and include no impoundments, structures, or constructed routes. They therefore qualify for wild classification.

Copper Creek tributaries should be found eligible.

Queen Basin tributaries to Copper Creek

2.3 miles, classification wild, outstandingly remarkable value wildlife

This critical boreal toad habitat is important for helping that imperiled species to thrive but also necessarily includes the unique and subtle beauty of marshlands and low-profile vegetation that composes that habitat.

Queen Basin tributaries to Cooper Creek lie entirely within the Maroon Bells Snowmass Wilderness and include no impoundments, structures, or constructed routes. They therefore qualify for wild classification.

Queen Basin tributaries to Copper Creek should be found eligible.

Cow Creek

5.21 miles, classification wild, outstandingly remarkable values scenery, geology, botanical/vegetation

The powerful and remote beauty of Cow Creek warrants the best of appreciation and protection. The documented uniquely high biodiversity of this stream's corridor is equally in need of protection. In addition,

the interdisciplinary team has identified essential boreal toad habitat in the stream corridor.

Cow Creek lies entirely within the Uncompahgre Wilderness, with no structures, impoundments, or constructed routes. It therefore qualifies for wild classification.

Cow Creek should be found eligible.

#### Wetterhorn Creek

.98 mile, classification wild, outstandingly remarkable values scenery, geology

The powerful and remote beauty of Wetterhorn Creek warrants the best of appreciation and protection.

Wetterhorn Creek lies entirely within the Uncompahgre Wilderness and includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification.

Wetterhorn Creek should be found eligible.

#### Wildhorse Creek

2.04 miles, classification wild, outstandingly remarkable values scenery, geology

The powerful and remote beauty of Wildhorse Creek warrants the best of appreciation and protection.

Wildhorse Creek lies entirely within the Uncompahgre Wilderness and includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification.

Wildhorse Creek should be found eligible.

#### Difficulty Creek

1.85 miles, classification wild, outstandingly remarkable values scenery, geology

The powerful and remote beauty of Difficulty Creek warrants the best of appreciation and protection.

Difficulty Creek lies entirely within the Uncompahgre Wilderness and includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification.

Difficulty Creek should be found eligible.

#### Roubideau Creek

13.29 miles, classification wild, outstandingly remarkable values scenery, geology, vegetation

Perched at the margin of distinctive desert geography, and providing essential streamflows to that special landscape, Roubideau Creek and its corridor include important wildland values and special recreational opportunities for backcountry exploration. It also includes essential riparian biodiversity rare at these elevations.

Downstream of the GMUG portion of Roubideau Creek, the BLM Uncompahgre Field Office (UFO) has determined its portions of Roubideau Creek to be wild & scenic eligible, with wild and scenic classifications, respectively; BLM Segment 1, immediately downstream, is found wild & scenic suitable, with wild classification, in the BLM final suitability report (and included in the preferred alternative for the proposed UFO Resource Management Plan).

Roubideau Creek lies entirely within the congressionally designated Roubideau Area managed to preserve wilderness character. It includes no impoundments, structures, or major constructed routes. It therefore qualifies for wild classification.

Roubideau Creek should be found eligible, complementary to and consistent with eligibility finding, and pending suitability finding, by the BLM.

#### Moore Creek

3.36 miles, classification wild, outstandingly remarkable values scenery, geology, vegetation

Perched at the margin of distinctive desert geography, Moore Creek provides essential streamflows to that special landscape as an important tributary to Roubideau Creek. Moore Creek and its corridor include important wildland values and special recreational opportunities for backcountry exploration. It also includes essential riparian biodiversity rare at these elevations.

Moore Creek lies entirely within the congressionally designated Roubideau Area managed to preserve wilderness character. It includes no impoundments, structures, or major constructed routes. It therefore qualifies for wild classification.

Moore Creek should be found eligible.

#### Traver Creek

1.89 miles, classification wild, outstandingly remarkable values scenery, geology, vegetation

Perched at the margin of distinctive desert geography, Traver Creek provides essential streamflows to that special landscape as an important tributary to Roubideau Creek. Traver Creek and its corridor include important wildland values and special recreational opportunities for backcountry exploration. It also includes essential riparian biodiversity rare at these elevations.

Traver Creek lies entirely within the congressionally designated Roubideau Area managed to preserve wilderness character. It includes no impoundments, structures, or major constructed routes. It therefore qualifies for wild classification.

Traver Creek should be found eligible.

#### Al Wright Creek

.44 mile, classification wild, outstandingly remarkable values scenery, geology, vegetation

Perched at the margin of distinctive desert geography, Al Wright Creek provides essential streamflows to that special landscape as an important tributary to Roubideau Creek. Al Wright Creek and its corridor include important wildland values and special recreational opportunities for backcountry exploration. It also includes essential riparian biodiversity rare at these elevations.

Al Wright Creek lies entirely within the congressionally designated Roubideau Area managed to preserve wilderness character. It includes no impoundments, structures, or major constructed routes. It therefore qualifies for wild classification.

Al Wright Creek should be found eligible.

#### Terrible Creek

.51 mile, classification wild, outstandingly remarkable values scenery, geology, vegetation

Perched at the margin of distinctive desert geography, Terrible Creek provides essential streamflows to that special landscape as an important tributary to Roubideau Creek. Terrible Creek and its corridor include important wildland values and special recreational opportunities for backcountry exploration. It also includes essential riparian biodiversity rare at these elevations.

Terrible Creek lies entirely within the congressionally designated Roubideau Area managed to preserve wilderness character. It includes no impoundments, structures, or major constructed routes. It therefore qualifies for wild classification.

Terrible Creek should be found eligible.

#### Long Creek

2.28 miles, classification wild, outstandingly remarkable values scenery, geology, vegetation

Perched at the margin of distinctive desert geography, Long Creek provides essential streamflows to that special landscape as an important tributary to Roubideau Creek. Long Creek and its corridor include important wildland values and special recreational opportunities for backcountry exploration. It also includes essential riparian biodiversity rare at these elevations.

Long Creek lies entirely within the congressionally designated Roubideau Area managed to preserve wilderness character. It includes no impoundments, structures, or major constructed routes. It therefore qualifies for wild classification.

Long Creek should be found eligible.

#### Bull Creek

1.6 miles, classification wild, outstandingly remarkable values scenery, geology, vegetation

Perched at the margin of distinctive desert geography, Bull Creek provides essential streamflows to that special landscape as an important tributary to Roubideau Creek. Bull Creek and its corridor include important wildland values and special recreational opportunities for backcountry exploration. It also includes essential riparian biodiversity rare at these elevations.

Bull Creek lies entirely within the congressionally designated Roubideau Area managed to preserve wilderness character. It includes no impoundments, structures, or major constructed routes. It therefore qualifies for wild classification.

Bull Creek should be found eligible.

#### Tabeguache Creek

3.56 miles, classification wild, outstandingly remarkable values scenery, heritage (prehistoric)

The distinctively rugged country found along upper Tabeguache Creek presents a colorful, highly diverse geography unique in Colorado. The scenic appeal and general accessibility have attracted human explorers for centuries, adding to the features and mystique of the area. Even so, the area's natural features of canyon seclusion and long vistas retain unique opportunities for primitive exploration and solitude. The creek and its corridor therefore exemplify the vision and purposes of the Wild and Scenic Rivers Act.

Tabeguache Creek is an important tributary to the San Miguel River. The stream corridor lies within the Colorado Natural Heritage Program (CNHP) San Miguel River at Tabeguache Creek Potential Conservation Area.

Downstream of the GMUG portion of Tabeguache Creek, the BLM Uncompahgre Field Office (UFO) has determined its Tabeguache Creek Segment 1 (and beyond private land farther downstream, Segment 2) are wild & scenic eligible, with wild and recreational classifications, respectively; BLM Segment 1, immediately downstream, is found wild & scenic suitable, with wild classification, in the BLM final suitability report (and included in preferred alternative for the proposed UFO Resource Management Plan).

Tabeguache Creek lies entirely within the congressionally designated Tabeguache Area, managed to preserve wilderness character. It includes no impoundments, structures, or major constructed routes. It therefore qualifies for wild classification.



Tabeguache Creek should be found eligible.

#### Tabeguache Creek

2.9 miles, classification wild, outstandingly remarkable value scenery

The distinctively rugged country found along Tabeguache Creek presents a colorful, highly diverse geography unique in Colorado. The scenic appeal and general accessibility have attracted human explorers for centuries, adding to the features and mystique of the area. Even so, the area's natural features of canyon seclusion and long vistas retain unique opportunities for primitive exploration and solitude. The creek and its corridor therefore exemplify the vision and purposes of the Wild and Scenic Rivers Act.

Tabeguache Creek is an important tributary to the San Miguel River. The stream corridor lies within the Colorado Natural Heritage Program (CNHP) San Miguel River at Tabeguache Creek Potential Conservation Area.

Downstream of the GMUG portion of Tabeguache Creek, the BLM Uncompahgre Field Office (UFO) has determined its Tabeguache Creek Segment 1 (and beyond private land farther downstream, Segment 2) are wild & scenic eligible, with wild and recreational classifications, respectively; BLM Segment 1, immediately downstream, is found wild & scenic suitable, with wild classification, in the BLM final suitability report (and included in preferred alternative for the proposed UFO Resource Management Plan).

Tabeguache Creek lies entirely within the congressionally designated Tabeguache Area, managed to preserve wilderness character. It includes no impoundments, structures, or major constructed routes. It therefore qualifies for wild classification.

Tabeguache Creek should be found eligible.

#### North Tabeguache Creek

2.05 miles, classification wild, outstandingly remarkable value scenery

The distinctively rugged country found along North Tabeguache Creek presents a colorful, highly diverse geography unique in Colorado. The scenic appeal and general accessibility have attracted human explorers for centuries, adding to the features and mystique of the area. Even so, the area's natural features of canyon seclusion and long vistas retain unique opportunities for primitive exploration and solitude. The creek and its corridor therefore exemplify the vision and purposes of the Wild and Scenic Rivers Act.

North Tabeguache Creek is a major tributary to Tabeguache Creek, in turn an important tributary to the San Miguel River. The stream corridor lies within the Colorado Natural Heritage Program (CNHP) San Miguel River at Tabeguache Creek Potential Conservation Area.

Downstream of the GMUG portion of Tabeguache Creek, the BLM Uncompahgre Field Office (UFO) has determined its Tabeguache Creek Segment 1 (and beyond private land farther downstream, Segment 2) are wild & scenic eligible, with wild classification; BLM Segment 1 is found wild & scenic suitable, with wild classification, in the BLM final suitability report (and included in preferred alternative for the proposed UFO Resource Management Plan).

North Tabeguache Creek lies entirely within the congressionally designated Tabeguache Area, managed to preserve wilderness character. It includes no impoundments, structures, or major constructed routes. It therefore qualifies for wild classification.

North Tabeguache Creek should be found eligible.

San Miguel River Segment 1

,08 mile, classification recreational, outstandingly remarkable values scenery, recreation

The San Miguel River is a regional icon and dominant geographic and hydrologic feature. While the river has been subjected to numerous diversions and other structures in service to human enterprise at other locations, it is notably natural, undisturbed, and scenic through this segment. It provides unique and popular river- floating recreation with impressively scenic surrounding views.

Indeed, because other portions of the San Miguel have been diverted or otherwise altered, the natural portions of the river capture the basic intent of the Wild and Scenic Rivers Act[rsquo] preamble, which states, in part:

The Congress declares that the established national policy of dam and other construction at appropriate sections of the rivers of the United States needs to be complemented by a policy that would preserve other selected rivers or sections thereof in their free-flowing condition to protect the water quality of such rivers and to fulfill other vital conservation purposes. (P.L. 90-542: 16

U.S.C. 1271-1287, Sec. 1)

The narrow, sinuous canyon along this segment of the river includes evidence of powerful geologic and

hydrologic movement and erosion, powerful hydraulic dynamics, diverse wildlife, with more than 300 bird species identified in the San Miguel River corridor.

Vegetation in the corridor is equally diverse. This segment supports five distinct and outstanding riparian communities. These include four superior (A-ranked) occurrences of communities classified as globally vulnerable (G3) thinleaf alder/mesic graminoid riparian shrubland (*Alnus incana* ssp. *tenuifolia*/mesic graminoids), narrowleaf cottonwood/blue spruce/thinleaf alder riparian forest (*Populus angustifolia*/*Picea pungens*/*Alnus incana* ssp. *tenuifolia*), narrowleaf cottonwood/thinleaf alder riparian woodland (*Populus angustifolia*/*Alnus incana* ssp. *tenuifolia*), and river birch/mesic graminoid riparian shrubland (*Betula occidentalis*/mesic graminoids). In addition, a superior (A- ranked) occurrence of blue spruce/red osier dogwood riparian forest (*Picea pungens*/*Cornus sericea*), ranked as apparently secure (G4), occurs here as well.

The segment is included within the Colorado Natural Heritage Program (CNHP) San Miguel River, Clay Creek to Horsefly Creek Potential Conservation Area.

Immediately downstream and upstream of the GMUG portion of San Miguel River, the BLM Uncompahgre Field Office (UFO) has determined its San Miguel River Segment 2 with wild classification (and other BLM segments upstream and downstream) are wild & scenic eligible; the segments are found wild & scenic suitable in the BLM final suitability report (and included in preferred alternative for the proposed UFO Resource Management Plan).

The BLM has also designated this segment as part of the San Miguel Area of Critical Environmental Concern (ACEC), primarily to protect outstanding riparian plant communities.

In those reports and findings for San Miguel River portions adjacent to the GMUG portion, the BLM identifies outstandingly remarkable values scenic, recreational, wildlife, and vegetation. The Forest should correspondingly adjust its eligibility evaluation and finding to include wildlife and vegetation.

The GMUG San Miguel River Segment 1 includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification, and the eligibility evaluation should be adjusted accordingly.

San Miguel River Segment 1 should be found eligible.

San Miguel River Segment 2

.37 mile, classification wild, outstandingly remarkable values scenery recreation

The San Miguel River is a regional icon and a dominant geographic and hydrologic feature. While the river has been subjected to numerous diversions and other structures of service to human enterprise at other locations, it is notably natural, undisturbed, and scenic through this segment. It provides unique and popular river- floating recreation with impressively scenic surrounding views.

Indeed, because other portions of the San Miguel have been diverted or otherwise altered, the natural portions of the river capture the basic intent of the Wild and Scenic Rivers Act's preamble, which states, in part:

The Congress declares that the established national policy of dam and other construction at appropriate sections of the rivers of the United States needs to be complemented by a policy that would preserve other selected rivers or sections thereof in their free-flowing condition to protect the water quality of such rivers and to fulfill other vital conservation purposes. (P.L. 90-542: 16

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The narrow, sinuous canyon along this segment of the river includes evidence of powerful geologic and hydrologic movement and erosion, powerful hydraulic dynamics, diverse wildlife, with more than 300 bird species identified in the San Miguel River corridor.

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graminoids), narrowleaf cottonwood/blue spruce/thinleaf alder riparian forest (*Populus angustifolia*/*Picea pungens*/*Alnus incana* ssp. *tenuifolia*), narrowleaf cottonwood/thinleaf alder riparian woodland (*Populus angustifolia*/*Alnus incana* ssp. *tenuifolia*), and river birch/mesic graminoid riparian shrubland (*Betula occidentalis*/mesic graminoids). In addition, a superior (A- ranked) occurrence of blue spruce/red osier dogwood riparian forest (*Picea pungens*/*Cornus sericea*), ranked as apparently secure (G4), occurs here as well.

The segment is included within the Colorado Natural Heritage Program (CNHP) San Miguel River, Clay Creek to Horsefly Creek Potential Conservation Area.

Immediately downstream and upstream of the GMUG portion of San Miguel River, the BLM Uncompahgre Field

Office (UFO) has determined its San Miguel River Segment 2 with wild classification (and other BLM segments upstream and downstream) are wild & scenic eligible; the segments are found wild & scenic suitable in the BLM final suitability report (and included in preferred alternative for the proposed UFO Resource Management Plan).

The BLM has also designated this segment as part of the San Miguel Area of Critical Environmental Concern (ACEC), primarily to protect outstanding riparian plant communities.

In those reports and findings for San Miguel River portions adjacent to the GMUG portion, the BLM identifies outstandingly remarkable values scenic, recreational, wildlife, and vegetation. The Forest should correspondingly adjust its eligibility evaluation and finding to include wildlife and vegetation.

The GMUG San Miguel River Segment 2 includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification.

San Miguel River Segment 2 should be found eligible.

#### North Fork Escalante Creek

12.63 miles, classification wild, outstandingly remarkable values fish[mdash]plus scenery, geology

This remote and ecologically healthy stream provides essential habitat for highly genetically pure populations of greenback cutthroat trout. The corresponding general continuity and integrity of all habitats are important as well. North Fork Escalante Creek is an important tributary to the BLM[rsquo]s Escalante Creek, which supports rare native flannelmouth and bluehead suckers.

Seasonally variable streamflows and water quality in the GMUG portion of North Fork Escalante Creek provide an important buffer to potential impacts along downstream segments traversing private land. This tributary similarly contributes

to the ecological and hydrological health of Escalante Creek farther downstream through BLM land.

The BLM Uncompahgre Field Office (UFO) has determined its downstream segments of Escalante Creek are wild & scenic eligible, with scenic and recreational classifications, respectively. BLM[rsquo]s portion of Escalante Creek lies entirely within the congressionally designated Dominguez-Escalante National Conservation

Area.

North Fork Escalante Creek includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification.

North Fork Escalante Creek should be found eligible, with the addition of ORVs scenery and geology.

Points Creek

3.38 miles, classification wild, outstandingly remarkable value fish

This remote and ecologically healthy stream provides essential habitat for highly genetically pure populations of greenback cutthroat trout. The corresponding general continuity and integrity of all habitats are important as well. Points Creek is an important tributary to the BLM's Escalante Creek, which supports rare native flannelmouth and bluehead suckers.

Seasonally variable streamflows and water quality in the GMUG portion of North Fork Escalante Creek provide an important buffer to potential impacts along downstream segments traversing private land. This tributary similarly contributes to the ecological and hydrological health of Escalante Creek farther downstream through BLM land.

The BLM Uncompahgre Field Office (UFO) has determined its downstream segments of Escalante Creek are wild & scenic eligible, with scenic and recreational classifications, respectively. BLM's portion of Escalante Creek lies entirely within the congressionally designated Dominguez-Escalante National Conservation Area.

Points Creek includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification.

Points Creek should be found eligible.

Kelso Creek

13.21 miles, classification wild, outstandingly remarkable value fish—plus scenery, geology

This remote and ecologically healthy stream provides essential habitat for highly genetically pure populations of greenback cutthroat trout. The corresponding

general continuity and integrity of all habitats are important as well. Kelso Creek is an important tributary to the BLM's Escalante Creek, which supports rare native flannelmouth and bluehead suckers.

Seasonally variable streamflows and water quality in the GMUG portion of North Fork Escalante Creek provide an important buffer to potential impacts along downstream segments traversing private land. This tributary similarly contributes to the ecological and hydrological health of Escalante Creek farther downstream through BLM land.

Kelso Mesa is the largest roadless area on the Uncompahgre Plateau. Kelso Creek is among the large perennial streams that flow off the plateau through dynamic ecological transitions and diverse set of landforms.

Kelso Mesa also includes the headwaters of the Colorado Natural Heritage Program (CNHP) Escalante Creek Potential Conservation Area. Kelso Creek in particular provides continued natural surface flow and resultant fluvial processes such as flood scouring, lateral flow, and channel meandering—all necessary to maintaining a dynamic distribution of riparian and wetland plant associations along the drainage.

The BLM Uncompahgre Field Office (UFO) has determined its downstream segments of Escalante Creek are wild & scenic eligible, with scenic and recreational classifications, respectively. BLM's portion of Escalante Creek lies entirely within the congressionally designated Dominguez-Escalante National Conservation Area.

Kelso Creek includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification.

Kelso Creek should be found eligible, with the addition of ORVs scenery and geology.

Stream-specific comments on additional 2005 eligible streams

all streams should retain 2005 eligibility or should be added to draft eligibility evaluation and found eligible

We strongly recommend that the all stream segments found eligible in the GMUG 2005 eligibility report retain their eligibility or be added to the draft eligibility evaluation and carefully studied for eligibility. All streams

described here should be determined eligible.

#### Slate River

3.5 miles, wild classification, outstandingly remarkable value scenery

The scenic dynamics of Slate River corridor are among the landscape highlights of the immediate region and of the GMUG National Forest in general. River canyons varying in shape from broad vales to plunging walls with multiple stunning waterfalls provide a unique and popular experience for explorers, whether casual or adventurous.

In addition to the exemplary scenery ORV identified in 2005 and confirmed by the interdisciplinary team, the Slate River corridor includes Colorado Natural Heritage Program (CNHP) element occurrence boreal owl low precision public land L1; CNHP element occurrence Grand Mesa penstemon high precision public land L1; CNHP element occurrence Altai cottongrass high precision public land L1; CNHP element occurrence Colorado River cutthroat trout high precision public land L1; along with Colorado Parks and Wildlife (CPW)-identified elk migration corridors. The national forest portion of the Slate River is included in the CNHP Slate River Potential Conservation Area.

In addition, Slate River hosts uniquely high-elevation heron rookeries.

The national forest portion of Slate River includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification.

Slate River should retain its 2005 eligibility, or it should be added to the streams studied in the draft eligibility evaluation and found eligible.

#### East River

6.7 miles, recreational classification, 2005 outstandingly remarkable values scenery, botanical

The sweeping valleys of East River afford impressive views, both distant and immediate. The primary value is anchored and defined by uniquely healthy and biologically diverse willow carrs. The Colorado Natural Heritage Program (CNHP) confirms this, identifying the corridor as element occurrence subalpine willow carr high precision public land L1.



In addition to the scenery and botanical ORVs identified in 2005, the East River corridor includes Colorado Parks and Wildlife (CPW)-identified bald eagle winter range, forage, and roosting; CPW Gunnison sage-grouse brood area, critical habitat occupied, lek buffer, overall range, winter range, and production area; CNHP potential conservation area L4 higher biodiversity significance; bighorn migration patterns, winter range, and concentration area; CNHP element observation Altai chickweed low precision public land L1; CNHP element occurrence boreal owl low precision public land L1; as well as CPW elk migration corridors and patterns, production area, severe winter range, winter concentration area, and mule deer severe winter range and winter concentration.

The national forest portion of East River includes no impoundments. Since it is paralleled in part by a road, campground, and some structures, it qualifies for recreational classification.

East River should retain its 2005 eligibility, or it should be added to the streams studied in the draft eligibility evaluation and found eligible.

#### Lower Taylor River

20.2 miles, recreational classification, 2005 outstandingly remarkable values recreation, fisheries

Lower Taylor River traverses lush and diverse riparian habitats, including a unique combination of wet meadows, grassy slopes, cottonwood galleries, and sage country. All these healthy ecosystems support and provide excellent backdrop for exemplary fly fishing and rafting opportunities along the river.

In addition to the recreation and fisheries ORV identified in 2005, the Lower Taylor River includes GMUG interdisciplinary team-identified scenic ORV; Colorado Parks and Wildlife (CPW)-identified bald eagle communal roosts, roost sites, winter concentration, winter forage, winter night roost sites, and winter range; U.S. Fish and Wildlife Service (FWS)-identified Gunnison sage-grouse occupied habitat; CPW Gunnison sage-grouse overall range, production area, and winter range; CPW bighorn migration corridors, migration patterns, production area, severe winter range, summer concentration area, and winter concentration area; CPW black bear fall concentration; Colorado Natural Heritage Program (CNHP) potential conservation areas L4 higher biodiversity; CNHP element observation mountain draba (mountain Whitlock-grass); CNHP element occurrence Black Canyon gilia high precision public land L1; CNHP element occurrence montane riparian forests high precision public land L1; CNHP element occurrence mountain bladder fern low precision public land L1; along with CPW elk migration corridors, migration patterns, severe winter range, and winter concentration area; and CPW mule deer severe winter range, winter concentration, and migration patterns.

Lower Taylor River includes no impoundments. Since it is crossed and paralleled in part by a road and some structures, it qualifies for recreational classification.

Lower Taylor River should retain its 2005 eligibility, or it should be added to the streams studied in the draft

eligibility evaluation and found eligible.

#### Escalante Creek

1.5 miles, scenic classification, outstandingly remarkable values vegetation/botanical, scenery, recreation, geologic, wildlife, fish, vegetation/botanical

Escalante Creek corridor retains the outstandingly remarkable value identified in 2005 (blue spruce riparian). Any changed circumstances or other evidence should be published and subject to public review and comment before removing the creek from eligibility.

Seasonally variable streamflows and water quality in the GMUG portion of North Fork Escalante Creek provide an important buffer to potential impacts along downstream segments traversing private land. This tributary similarly contributes to the ecological and hydrological health, and geological features, of Escalante Creek farther downstream through BLM land.

The BLM Uncompahgre Field Office (UFO) has determined its immediately downstream segments of Escalante Creek are wild & scenic eligible, with scenic classifications. The BLM portion of Escalante Creek lies entirely within the congressionally designated Dominguez-Escalante National Conservation Area, a portion in the Dominguez Canyon Wilderness.

The BLM portion was found not-suitable in the NCA final resource management plan (RMP) primarily because the legislative provision designating the NCA and wilderness, along with protective management described in the RMP, were considered sufficient to protect the outstandingly remarkable values (ORVs) identified during eligibility evaluation. All BLM ORVs remain highlighted in the RMP as important and in need of protection.

The BLM's finding of not-suitable for its portion of Escalante Creek therefore does not suggest that the creek's values are insufficient to warrant an eligibility finding along the national forest segment. Indeed, the BLM's deliberate protection of the creek's important ORVs, albeit by other administrative-protection means, indicates that eligibility for the upstream portion is all the more important.

The BLM portion of Escalante Creek offers very high scenic qualities. The cascading white-water creek runs swiftly and linearly here, creating dramatic potholes and waterfalls. A large-scale sandstone canyon provides dramatic vistas, prominent vertical and horizontal cliffs, major rock outcroppings, and jagged ridgelines that dominate the landscape. Landform colors abound in shades of tan, pink, red, orange,

brown and blue. The surrounding vegetation adds to the beauty, providing shades of green, golden, yellow, and tan, and the vegetation becomes increasingly dense along the creek.

The BLM segment, supported by streamflows from the national forest portion, has outstanding opportunities for recreation, primarily in the Escalante Potholes recreation site. Escalante Creek has smoothed and sculpted the Precambrian metamorphic rock through which it flows, creating a series of chutes, falls, and plunge pools. These features are rare. During the spring snowmelt, high water surges through the Potholes area, attracting extreme kayakers from all over the western United States. The complex hydraulic features challenge even the most experienced kayakers. Later in the season, as the snowmelt tapers off and the creek returns to a more sedate and steady flow, the potholes are used for wading, swimming, and streamside camping by groups and individuals, primarily from Colorado's West Slope. Classic Colorado Plateau canyon scenery and the rare occurrence of black Precambrian schist in a perennially flowing streambed combine to make this section of Escalante Creek able to provide an exceptional recreational experience.

The Escalante Potholes are a regionally rare geological and hydrological streambed feature in the lower reach of this segment. The potholes are hourglass-shaped erosional features occurring in hard Precambrian gneiss where it intercepts the streambed of Escalante Creek. Stream channel knickpoints have formed in the overlying softer sedimentary rock units, providing high velocity waters with adequate sediment supply and hydrologic energy to produce circulating erosive water currents. The scouring process that occurs primarily during the annual spring snowmelt has taken thousands of years to produce the current state of the potholes. There are no other areas in the region where Precambrian gneiss is exposed and shaped by a stream powerful enough to create these features, yet not so powerful as to completely erode the stream channel smooth. This rare combination of lithology and erosion demonstrates not only the efficacy of hydrology upon geology, but also the creative sculpturing action that time and water have upon a very resistant medium. With almost any other medium, such as sandstone or even marble, these effects would not have produced such dramatic features as the potholes of Escalante Creek.

The BLM portion of Escalante Canyon provides exceptionally high-quality habitat for peregrine falcons (*Falco peregrinus*) and is considered a regionally important area for this BLM sensitive species. In 1999, the peregrine was delisted from threatened status under the ESA. The BLM monitors the status of peregrine populations to ensure continued recovery of the species. Peregrine falcons are closely associated with steep-walled canyons and often nest near perennial water sources that support prey populations such as waterfowl, songbirds, and shorebirds. Peregrine falcon pairs were observed in Escalante Canyon as recently as 2008 and 2009, and breeding/nesting activity has been confirmed along this segment.

Escalante Creek is regionally important habitat for resident populations of native roundtail chubs, bluehead suckers, and flannelmouth suckers, as well as serving as a spawning site for Gunnison River populations of all three of these BLM and Colorado sensitive species.

The national forest portion of Escalante Creek includes no impoundments or structures. It is paralleled by an unpaved road, so it qualifies for wild or scenic classification.

Escalante Creek should retain its 2005 eligibility, or it should be added to the streams studied in the draft eligibility evaluation and found eligible with outstandingly remarkable values vegetation/botanical, recreation, geologic, wildlife, and fish/rare species.

#### Bear Creek

3 miles, from national forest boundary to national forest/private land boundary, wild classification, outstandingly remarkable values scenery, recreation

As affirmed in the 2005 eligibility finding for Bear Creek, and in subsequent field observations, scenery values along the creek and viewed from its corridor are outstanding. Views include gorges, waterfalls, precipitous cliffs, volcanic features, and tidal ripple marks. The creek alternately flows through peaceful meanders and thundering drops. Water hues range from dark cobalt to green to icy blue. Water quality is exemplary in its purity.

In addition to the exemplary scenery and recreation ORVs identified in 2005, Bear Creek corridor includes Colorado Natural Heritage Program (CNHP) Potential Conservation Area L4 higher biodiversity significance; CNHP element observation mountain draba low precision public land L1; CNHP element occurrence dark blue low precision public land L1; CNHP element occurrence Great Basin sliverspot butterfly low precision public land L1; CNHP element occurrence large-flower globe-mallow low precision public land L1; CNHP element occurrence slender rock-brake low precision public land L1; CNHP element occurrence southern maiden-hair low precision public land L1; CNHP element occurrence Black Canyon gilia high precision public land L1; CNHP element occurrence Colorado Divide Whitlow-grass high precision public land L1; along with Colorado Parks and Wildlife (CPW) bighorn production area; and CPW elk migration corridors.

Bear Creek includes no impoundments. Since it flows through a GMUG wilderness inventory unit (2018), it qualifies for wild classification.

Bear Creek should retain its 2005 eligibility, or it should be added to the streams studied in the draft eligibility evaluation and found eligible.

#### Bridal Veil Creek (falls)

.01 mile, recreational classification, outstandingly remarkable values historical, wildlife, scenery

The falls of Bridal Veil Creek retain the outstandingly remarkable values identified in 2005. The GMUG interdisciplinary team has since noted that the falls might not be on national forest land. Documentation of that location detail should be published and subject to public review and comment before removing the falls from eligibility.

Otherwise, Bridal Veil Creek (falls) should retain its 2005 eligibility.

#### Ingram Falls

.01 mile, recreational classification, outstandingly remarkable values wildlife, scenery

Ingram Falls retain the outstandingly remarkable value identified in 2005, especially scenery. The GMUG interdisciplinary team has since confirmed presence of uncommon black swift at the falls. Any changed circumstances or other evidence should be published and subject to public review and comment before removing the falls from eligibility.

Otherwise, Ingram Falls should retain its 2005 eligibility.

#### Stream-specific comments on additional streams

all streams should be added to draft eligibility evaluation and found eligible

Several streams not previously studied for wild & scenic eligibility are free-flowing and possess at least one outstandingly remarkable value.

We strongly recommend that the following streams be added to the draft eligibility evaluation and carefully studied for wild & scenic eligibility. All streams listed here should be determined eligible.

#### Monitor Creek

Approximately .75 mile, from source to national forest/BLM boundary, wild classification, outstandingly remarkable values vegetation, fish

Immediately downstream of the GMUG portion of Monitor Creek, the BLM Uncompahgre Field Office (UFO) has determined its portion of Monitor Creek is wild & scenic eligible, with wild classification; it is found wild & scenic suitable in the BLM final suitability report (and included in preferred alternative for the proposed UFO Resource Management Plan).

Between eligibility and suitability, the BLM determined that Monitor Creek contains viable populations of bluehead sucker and flannelmouth sucker, adding the outstandingly remarkable value for fish.

The Forest should correspondingly find Monitor Creek eligible with ORVs vegetation and fish/rare species.

Outstandingly remarkable value documented on Monitor Creek is vegetation. Specifically, the stream corridor contains areas of narrowleaf cottonwood/strappleaf willow/silver buffaloberry riparian forest (*Populus angustifolia*/*Salix ligulifolia*/*Shepherdia argentea*), which is classified as critically imperiled globally (G1). Areas of globally imperiled (G2) Fremont cottonwood/skunkbush sumac riparian woodland (*Populus deltoides* spp. *Wislizeni*/*Rhus trilobata*) also occur along this stream. In addition, Monitor Creek contains a superior (A-ranked) occurrence of the common coyote willow riparian shrubland (*Salix exigua*/mesic graminoids).

Monitor Creek is within the Colorado Natural Heritage (CNHP) Roubideau Creek Potential Conservation Area.

In addition, the BLM has now documented that its downstream portion of Monitor Creek also supports a superior (A-ranked) occurrence of the common coyote willow riparian shrubland (*Salix exigua*/mesic graminoids).

Monitor Creek drains from the Uncompahgre Plateau portion of the GMUG National Forest, with high streamflow typically occurring during spring snowmelt.

The national forest portion of Monitor Creek includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification.

Monitor Creek should be added to the list of streams studied in the draft eligibility evaluation, and it should be found eligible with outstandingly remarkable values vegetation and fish, consistent with and complementary to eligibility finding, and pending suitability finding, by the BLM.

#### Potter Creek

Approximately 6.5 miles, from source to national forest/BLM boundary, wild classification, outstandingly remarkable values vegetation, fish

Immediately downstream of the GMUG portion of Potter Creek, the BLM Uncompahgre Field Office (UFO) has determined its portion of Potter Creek is wild & scenic eligible, with wild classification; it is found wild & scenic suitable in the BLM final suitability report (and included in the preferred alternative for the proposed UFO Resource Management Plan).

Between eligibility and suitability, the BLM determined that Potter Creek contains viable populations of bluehead

sucker and flannelmouth sucker, warranting the BLM's addition of an outstandingly remarkable value for fish.

The Forest should correspondingly find Potter Creek eligible with ORVs vegetation and fish/rare species.

Outstandingly remarkable value documented on Potter Creek is vegetation. Specifically, the stream corridor includes areas of narrowleaf cottonwood/strawleaf willow-silver buffaloberry riparian forest (*Populus angustifolia*/*Salix ligulifolia*/*Shepherdia argentea*), classified as critically imperiled globally (G1). This segment is included in the Colorado Natural Heritage Program (CNHP) Roubideau Creek Potential Conservation Area.

The national forest portion of Potter Creek includes no impoundments, structures, or significant constructed routes. The upper stream crosses the Roubideau Mesa Trail. It therefore qualifies for wild classification either for its full length or for the portion downstream of the trail.

Potter Creek should be added to the list of streams studied in the draft eligibility evaluation, and it should be found eligible with outstandingly remarkable values vegetation and fish, consistent with and complementary to eligibility finding, and pending suitability finding, by the BLM.

#### Cottonwood Creek (Delta County)

Approximately 8 miles from source to national forest/BLM boundary, classification recreational, outstandingly remarkable value vegetation

Immediately downstream of the GMUG portion of Cottonwood Creek, the BLM Uncompahgre Field Office (UFO) has determined its portion of Cottonwood Creek is wild & scenic eligible, with scenic classification. It is found wild & scenic suitable in the BLM Dominguez-Escalante National Conservation Area Resource Management Plan.

The Forest should correspondingly find Cottonwood Creek eligible with ORV vegetation.

Outstandingly remarkable value documented on Cottonwood Creek is vegetation. Specifically, the stream corridor supports a superior (A-ranked) occurrence of globally vulnerable (G3) narrowleaf cottonwood/skunkbush sumac riparian woodland (*Populus angustifolia*/*Rhus trilobata*). The Colorado Natural Heritage Program (CNHP) includes this segment within the Cottonwood Creek Potential Conservation Area.

The national forest portion of Cottonwood Creek includes no impoundments or structures. The segment crosses FSR 504, and an unpaved road parallels approximately three miles of the stream's upper reach. It therefore qualifies for recreational classification.

Cottonwood Creek should be added to the list of streams studied in the draft eligibility evaluation, and it should be found eligible with outstandingly remarkable value vegetation, consistent with and complementary to eligibility finding, and pending suitability finding, by the BLM.

#### Beaver Creek

Approximately 2 miles, from confluence with McCulloch Creek to national forest/BLM boundary, classification wild, outstandingly remarkable value vegetation

Immediately downstream of the GMUG portion of Beaver Creek, the BLM Uncompahgre Field Office (UFO) has determined its portion of Beaver Creek is wild & scenic eligible, with scenic classification; it is found wild & scenic suitable in the BLM final suitability report (and included in the preferred alternative for the proposed UFO Resource Management Plan).

The Forest should correspondingly find Beaver Creek eligible with ORV vegetation. Outstandingly remarkable value documented on Beaver Creek is vegetation.

Specifically, the stream corridor supports a superior (A-ranked) occurrence of

globally vulnerable (G3) narrowleaf cottonwood/blue spruce/thinleaf alder riparian forest (*Populus angustifolia*/*Picea pungens*/*Alnus tenuifolia*).

In addition, the Beaver Creek corridor includes Colorado Natural Heritage Program (CNHP) element occurrence Geyer's willow-Rocky Mountain willow/mesic forb high precision public land L1; CNHP conservation areas L4 higher biodiversity significance; Colorado Parks and Wildlife (CPW)-identified elk production area; CPW bald eagle winter range; CPW Gunnison sage-grouse overall range, production area, and winter range; U.S. Fish and Wildlife Service (FWS) Gunnison sage-grouse critical occupied habitat; along with CPW elk migration patterns and mule deer migration patterns.

The national forest portion of Beaver Creek includes no impoundments, structures, or constructed routes. The national forest portion therefore qualifies for wild classification (or at least scenic to correspond with downstream BLM classification).

Beaver Creek should be added to the list of streams studied in the draft eligibility evaluation, and it should be found eligible with outstandingly remarkable value vegetation, consistent with and complementary to eligibility finding, and pending suitability finding, by the BLM.



## Fall Creek

Approximately 3 miles, from source to Hughes Ditch Diversion, classification wild, outstandingly remarkable values fish, wildlife/rare species, vegetation

The upper portion of Fall Creek includes high quality habitat supporting a conservation population of greenback cutthroat trout, as identified by the GMUG interdisciplinary team; Colorado Natural Heritage Program (CNHP) element observation northern leopard frog low precision public land L1; CNHP element occurrence House[squo]s sandwort high precision public land L1; along with Colorado Parks and Wildlife (CPW)-identified bald eagle winter range; CPW elk severe winter range and production area.

The upper portion of Fall Creek includes no impoundments, structures, or constructed routes. It therefore qualifies for wild classification.

Fall Creek should be added to the list of streams studied in the draft eligibility evaluation, and it should be found eligible with outstandingly remarkable values fish, wildlife/rare species, and vegetation.

## Horsefly Creek

Approximately 17.8 miles, from source to national forest boundary (or approximately 12 miles, from national forest/private land boundary to national forest boundary), classification wild, outstandingly remarkable values fish, wildlife/rare species, vegetation

Horsefly Creek is an essential tributary to the lower San Miguel River. The creek corridor contains Colorado Natural Heritage Program (CNHP) element occurrence Colorado River cutthroat trout high precision public land L1; Colorado Oil and Gas Conservation Commission (COGCC) aquatic designated cutthroat trout habitat; U.S. Fish and Wildlife Service (FSW) Gunnison sage-grouse critical habitat vacant; CNHP element occurrence montane riparian forest high precision public land L1; CNHP element occurrence Lewis[squo]s woodpecker low precision public land L1; along with Colorado Parks and Wildlife (CPW)-identified bald eagle winter range; CPW bear fall concentration; CPW elk severe winter range, winter concentration area, migration patterns, and production area; CPW mule deer severe winter range; CPW bald eagle roost sites winter forage, winter night roost sites.

The national forest portion of Horsefly Creek includes no impoundments, structures, or constructed routes. The lower reach crosses a low-maintenance trail. It therefore qualifies for wild classification or, at least, wild above the trail crossing, scenic below the crossing.

Horsefly Creek should be added to the list of streams studied in the draft eligibility evaluation, and it should be

found eligible with outstandingly remarkable values fish, wildlife/rare species, and vegetation.

#### Conclusions and summary of recommendations

[bull] The draft eligibility evaluation includes well-researched documentation of the wild & scenic qualifications of 30 stream segments, presented in nine watershed clusters. All of those stream segments warrant wild & scenic eligibility and should be carried forward in the final eligibility report.

[bull] The draft eligibility evaluation fails to address the wild & scenic qualities, and eligibility status, of seven streams found eligible in the Forest's 2005 eligibility report. Eligibility status for these streams must be retained and carried forward in the revised forest plan, unless the Forest provides compelling and detailed documentation of changed conditions that may have occurred since the 2005 report.

[bull] When considering river-related values in the context of regions of comparison (to determine whether values are outstandingly remarkable and thus qualified for finding of wild & scenic eligibility), the evaluation should err on the side of finding streams eligible, and it should be based on the unique importance of streams and their related values to the ecological and hydrological health of the GMUG itself.

[bull] An insufficient number of streams are included in the draft evaluation. Six specific streams, not previously studied by the GMUG, should be added to the eligibility evaluation, carefully considered, and found eligible in the final report.

[bull] All streams documented above—those included in the draft eligibility evaluation, those included in the 2005 eligibility report, and those recommended for addition to the evaluation—should be found wild & scenic eligible and carried forward into the revised forest plan for protective interim management.

Submitted by

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.

Lauren McCain, Senior Federal Lands Policy Analyst

Defenders of Wildlife

Defenders of Wildlife is a non-profit conservation organization founded in 1947 and focused on conserving and restoring native species and the habitat upon which they depend. Defenders has a strong interest in forest planning under the 2012 Planning Rule and is committed to working with the Forest Service to develop and

implement forest plans that effectively meet the conservation objectives of the rule.

Defenders represents 1.8 million members and supporters nationwide and 10,538 members and supporters in Colorado.

Robyn Cascade, Leader Northern San Juan Chapter  
Great Old Broads for Wilderness

Great Old Broads for Wilderness is a national organization, led by women, that engages and inspires the activism of elders to preserve and protect wilderness and wild lands. Broads gives voice to the millions of older Americans who want to protect their public lands for this and future generations. We bring experience, commitment, and humor to the movement to protect the last wild places on earth.

Rosalind McClellan, Director  
Rocky Mountain Recreation Initiative

Alison Gallensky, GIS & IT Director  
Rocky Mountain Wild

Rocky Mountain Wild works to protect, connect, and restore wildlife and wild lands in the Southern Rocky Mountain region, working collaboratively with land management agencies and with other conservation organizations to ensure a biologically healthy future for our region. Rivers are the foundation for the healthy ecosystems and biodiversity that we seek to protect.

Mark Pearson, Executive Director  
San Juan Citizens Alliance

San Juan Citizens Alliance advocates for clean air, pure water, and healthy lands—the foundations of resilient communities, ecosystems, and economies in the San Juan Basin.

Christine Canaly, Director  
San Luis Valley Ecosystem Council

We believe in the power of education, stewardship, community involvement, and public advocacy. Our mission is to protect and restore the biological diversity and natural resources of the Upper Rio Grande region, balancing ecological values with human needs.

Karen Tuddenham, Executive Director  
Sheep Mountain Alliance

Since 1988, Sheep Mountain Alliance has been the primary environmental voice of our region of Southwest Colorado. We serve over 20,000 residents of the northern San Juan, San Miguel, and Dolores watersheds. Through education, advocacy, and outreach, we strive to protect the clean air, clean water, and intact ecosystems that support the future of our communities and wildlife.

Vera Smith, National Forest Planning & Policy Director Jim Ramey, Colorado State Director  
The Wilderness Society

Our mission is to protect wilderness and to inspire Americans to care for wild places. We fight for legal protections for our wildest places, and we champion and defend national policies that give protections for public lands, especially for our national forests, parks, refuges, and Bureau of Land Management lands. We are guided by science, learning, and adapting to create enduring solutions for future generations.

John Mellgren, Wildlife Director  
Western Environmental Law Center

Western Environmental Law Center is a non-profit firm that uses the power of the law to safeguard the public lands, wildlife, and communities of the American West in the face of a changing climate. WELC has long worked to protect public lands in western Colorado, including the GMUG National Forest.

Steve Allerton, President  
Western Colorado Alliance

The responsible management of our public lands protects our communities' heritage, supports healthy wildlife and their habitat, sustain a strong and self-reliant economy, and preserves our quality of life for generations to come.

John Stansfield, Vice President  
Wild Connections

Wild Connections' mission is to identify, protect, and restore wildlands, native species, and biological diversity in the Upper Arkansas and South Platte watersheds.

Susan Jacobson  
Denver, Colorado