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Organization: Backcountry Hunters & Anglers

Title: Regional Director, Central West Slope

Comments: To: Forest Planning Team

Re: GMUG Draft Wild and Scenic River Eligibility Evaluation

March 21, 2019

We appreciate the opportunity to continue to provide public comments and input to the Forest Plan Revision on the Draft Wild and Scenic Eligibility Report for the GMUG National Forests. I am submitting the following comments on behalf of the Colorado Chapter of Backcountry Hunters & Anglers. I currently serve our Chapter as the Regional Director for the Central Western Slope. Our chapter currently has over 3,000 members from throughout the State, and we have a vested interest in the management of the Grand Mesa, Uncompahgre, and Gunnison National Forests.

The GMUG National Forests provide essential habitat for a wide variety of wildlife and fish, and it is a National destination for hunting and fishing as well as wildlife watching. Hunters and anglers have tremendous opportunities to enjoy large backcountry habitats in pursuit of fish and game, as well as the solitude and challenge of experiencing large intact landscapes.

Currently 46% of the GMUG is classified as wilderness or roadless. The Forest has an estimated 3,600 miles of perennial streams, 7,000 miles of ephemeral and intermittent streams, and numerous lakes and reservoirs that support outstanding fisheries. Recent stream surveys by the CPW and Forest Service have also documented several native fish populations that are cooperatively managed to recover native fish populations. These public lands and waters provide essential habitats that are crucial to perpetuating our populations of wildlife and fish.

The Draft Evaluation is the first step to identify segments that are 1) free flowing, and 2) have at least one Outstandingly Remarkable Value (ORV). This will be the third time the GMUG has undertaken the evaluation of Wild & Scenic Rivers. We fully support the inclusion of all segments identified as Eligible in the Draft Report. However, after our review we feel that the latest effort has arbitrarily removed other segments previously included in the 2006 evaluation, and should have included additional segments that we believe meet the criteria for both free flowing and have at least one ORV.

For example, the Taylor River was originally found to be eligible in the 2006 evaluation but has now been dropped by the Forest Supervisor because he felt that the fisheries did not meet the ORV criteria for fish. We feel that this river epitomizes the definition of a Wild & Scenic River classified as Recreational. The Gold Medal fishery of the Taylor River below the reservoir is regionally unique, attracting anglers from all over the Nation. It also supports private and commercial rafting and kayaking activities in an outstanding setting that is

unsurpassed in much of Colorado.

We question the logic and process behind deleting this and the other stream segments previously identified in the 2006 evaluation. The Current Eligibility Evaluation sites changed circumstances for the need to reevaluate Wild & Scenic eligibility. We request inclusion of additional criteria that we believe are Outstandingly Remarkable Values to us as public land hunters and anglers.

Specifically we recommend:

- \* All native fish populations should be considered for eligibility, with an emphasis on Green lineage conservation populations

- \* Recreational fisheries be valued and as ORV

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Populations of fisheries and/or the habitat should make a stream eligible as W&S

Craig Grother

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Regional Director, Central Western Slope

Backcountry Hunters & Anglers

The Sportsman's Voice for Our Wild Public Lands, Waters and Wildlife

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