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Comments: Please see the attached comments from the Pew Charitable Trusts regarding the draft Wild & Scenic Eligibility Evaluation of the Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision.

Dear Grand Mesa-Uncompahgre-Gunnison National Forest Revision Team:

Please accept our comments on the Draft Wild & Scenic Eligibility Evaluation for the Grand Mesa-Uncompahgre-Gunnison (GMUG) National Forest plan revision. The Pew Charitable Trusts aims to preserve ecologically and culturally diverse publicly owned lands and waters through congressionally designated wilderness and wild and scenic rivers, and administrative protections. Consistent with these goals, we have an interest in the implementation of the Forest Service's 2012 planning rule, particularly as it applies to Wild and Scenic River Eligibility, and the GMUG's current forest plan revision. We greatly appreciate the work of Forest Service staff in this process and the opportunity to offer our comments. We offer some general overarching comments as well as more specific comments that focus on three areas: 1) river segments in the draft evaluation that we believe should be found eligible for Wild and Scenic designation; 2) rivers previously found eligible in the 2005 revision that we recommend retain their eligibility; and 3) rivers that are eligible for inclusion in the national Wild and Scenic Rivers system that were not included in the draft eligibility evaluation.

#### General Overarching Comments

The 2012 planning rule requires the Forest Service to identify rivers eligible for inclusion in the National Wild and Scenic Rivers System (36 CFR 219.7(c)(2)(v) and (vi)). Through the 2005 eligibility study process, the Grand Mesa-Uncompahgre-Gunnison National Forest identified 77 rivers as eligible for consideration as wild, scenic, or recreational rivers under the Wild and Scenic Rivers Act. We support updating this inventory of eligible rivers, as is required by the 2012 planning rule, and encourage the Forest Service to refrain from addressing suitability in this analysis to avoid expanding the scope of this effort.

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 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; clean water for municipal and agricultural uses; unique recreation opportunities; and inherent scenic and natural values. The draft eligibility evaluation describes a 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. While these resources are indeed valuable and should be considered, we urge the Forest to also consider stream and habitat information available from the State of Colorado's Natural Heritage Program data and Colorado Natural Areas Program land identifications. This data has unique and often more detailed information relevant for this evaluation process, and excluding this information from the evaluation ensures that the Forest would not be using the best available information for its evaluation.

#### Specific Comments on River Eligibility

Pew offers specific comments on three aspects of this draft evaluation. First, we have reviewed and offer specific comments on the rivers which have been included in the draft evaluation. Second, we discuss rivers that were found eligible in the 2005 evaluation. And finally, we offer specific comments on rivers that were excluded from this evaluation, but which we believe are eligible for inclusion in the national Wild and Scenic Rivers system.

#### Rivers Included in the Draft Evaluation Should Be Found Eligible

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

We appreciate the inclusion in the draft evaluation of 30 stream segments (in 9 river/watershed contexts). We especially acknowledge the 18 stream segments that had not been previously studied for eligibility. We appreciate the time and effort that went into this evaluation, and we support findings of wild & scenic eligibility for all the stream segments included in the draft eligibility evaluation. Those include:

- [bull] Oh-be-joyful Creek and tributaries

- [bull] West Elk Creek

- [bull] West Soap Creek

- [bull] Cooper Creek and tributaries

- [bull] Cow Creek and tributaries

- [bull] Roubideau Creek and tributaries

- [bull] Tabeguache Creek and North Fork

- [bull] San Miguel River

- [bull] North Fork Escalante and Kelso

Oh-be-joyful Creek, Blue Lake tributary, and Dippold Basin tributary  
6.56 miles, classification wild, outstandingly remarkable value scenery

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 scenery

The segment includes no impoundments or structures. It is paralleled by a trail and unpaved road. Preliminary classification should therefore be changed to scenic and the Forest should consider adding Outstandingly Remarkable Value (ORV) for scenery.

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 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

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

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

West Soap Creek lies entirely within the West Elk Wilderness and includes no impoundments, structures, 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

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

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

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

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

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

Cow Creek lies entirely within the Uncompahgre Wilderness and includes no impoundments, structures, 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

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

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

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

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, consistent with and complementary to eligibility finding, and pending suitability finding, by the BLM.

#### Moore Creek

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

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

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.

#### AI Wright Creek

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

AI 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.

AI Wright Creek should be found eligible.

#### Terrible Creek

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

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

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

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)

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

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

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 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 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

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.

Points Creek

3.38 miles, classification wild, outstandingly remarkable value fish

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

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

Kelso Creek should be found eligible.

#### Streams Previously Found Eligible but not Included in the Draft

In addition to the streams listed above that the draft evaluation found eligible, we urge the Forest to retain the eligibility of all streams that the Forest previously found, in 2005, to be wild & scenic eligible. As discussed in the Forest Service Handbook, all streams that have previously been found to be wild and 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 eligible streams, and provides the opportunity for public review and comment on those asserted changes. (FSH 1909.12, Chapter 80, 82.2) The draft eligibility evaluation, however, excludes several such streams but includes no such documentation of stream-specific changed circumstances on the following streams (found eligible in 2005), or of other reasons for their exclusion in the current draft evaluation. As such, the Forest should determine that the following streams are eligible:

- [bull] Slate River

- [bull] East River

- [bull] Lower Taylor River

- [bull] Escalante Creek

- [bull] Bear Creek

- [bull] Bridal Veil Creek (falls)

- [bull] Ingram Falls

#### Slate River:

3.5 miles, wild classification, outstandingly remarkable value scenery

This corridor is among the scenic highlights of the immediate region; 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. The national forest portion of the 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 national forest portion of East River includes no impoundments. Since it is paralleled in part by a road, a 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. 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 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

Bear Creek was identified in 2005 to have the scenic and recreation ORVs. It includes a Colorado Natural Heritage Program Potential Conservation Area with high biodiversity significance. 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 retains the outstandingly remarkable value identified in 2005. 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.

Other streams not included in draft

The GMUG is, of course, a very large geography with highly diverse landscapes, stream-related landforms, and riparian habitats. Several streams not previously studied for wild & scenic eligibility are free-flowing and possess at least one outstandingly remarkable value. We specifically recommend that the following additional streams and stream segments be evaluated for wild & scenic eligibility and determined eligible:

[bull] Monitor Creek

[bull] Potter Creek

[bull] Cottonwood Creek

[bull] Beaver Creek

[bull] Fall Creek

[bull] Horsefly Creek

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; BLM found it to be wild & scenic suitable in the BLM final suitability report (and included in the preferred alternative for the proposed UFO Resource Management Plan). 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; BLM found it to be wild & scenic suitable in the BLM final suitability report (and included in the preferred alternative for the proposed UFO Resource Management Plan). 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:

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. BLM found it to be wild & scenic suitable in the BLM Dominguez-Escalante National Conservation Area Resource Management Plan. 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;

BLM found it to be wild & scenic suitable in the BLM final suitability report (and included in the preferred alternative for the proposed UFO Resource Management Plan).

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 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

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.

#### Conclusion

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.

We appreciate this opportunity to comment on the Grand Mesa-Uncompahgre-Gunnison National Forest Draft Wild & Scenic Eligibility Evaluation and look forward to continuing our engagement in this important planning effort. Please do not hesitate to contact us if you have any questions or if we can be of service.

Sincerely,

John Gilroy Director

U.S. Public Lands and Rivers Conservation The Pew Charitable Trusts