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Organization:

Title:

Comments:

Thank you for the opportunity to comment on the GMUG Wild & Scenic River Eligibility Evaluation Report. As a resident of Ouray County and an avid backcountry explorer and backpacker, I am thrilled with your finding Cow Creek (ID 24) and its tributaries as "wild." Thank you for acknowledging the wildness, pristine ecological values and extraordinary scenery of the upper basins of Wildhorse Creek, Wetterhorn Creek, and Difficulty Creek that contribute to the "wild" value of the entire Cow Creek watershed!!

Though I am pleased to see Bear Creek (ID 23) warrants a "scenic" designation in your evaluation report, I am quite disturbed that Bear Creek was found eligible in the 2005 Wild and Scenic evaluation but not in the current report. It is my understanding that all streams previously found wild & scenic eligible must retain their eligibility until and unless the agency presents detailed evidence of changed circumstances or conditions that have occurred diminishing the values of such a segment. Furthermore, the USFS must provide opportunity for public review of those asserted changes. I did not see any reference to or description of changed conditions to Bear Creek in your report, and therefore this segment should be considered eligible in the current evaluation draft as it was in 2005.

My experience in the Bear Creek drainage - exploring on and off trail - leads me to believe it warrants a continued "wild" rating. Based upon your evaluation criteria, the following is my rationale:

*Bear Creek is free-flowing its entire length as are its tributaries.

*Bear Creek exhibits multiple characteristics as defined by "Categories of Outstanding Remarkable Values (ORV.)"

Scenic: Contrary to the GMUG planning comments, "Scenery is beautiful but not outstanding within the region of comparison," I would argue that the scenery IS indeed outstanding in comparison. From the Bear Creek National Recreation Trail one can view deep gorges; trickling as well as thundering waterfalls; dramatic cliffs; volcanic tuff pinnacles; iron-rich intrusions; fossilized tidal ripple marks and more. Furthermore, pristine water flows tranquilly through gentle ascending grades and with pounding power in steep segments. A favorite experience of mine is the view of water bubbling beneath melting ice in springtime as air pockets and water shift and dance beneath the thin ice. Truly magnificent! Colors of Bear Creek shift from dark cobalt to emerald to icy blue (in the mineral-rich South Fork reminiscent of Havasu Creek or the Little Colorado River in the Grand Canyon! This phenomenon must be witnessed to be appreciated.) Off trail, views are equally dramatic as one traverses high alpine basins or peers down into dramatic abysses caused by volcanic activity. The views into the river corridor as well as the views toward the Mount Sneffels Wilderness and the proposed Whitehouse Addition to the Sneffels Wilderness are indeed outstanding and worthy of ORV. Furthermore, the colorful aspen in autumn against the dramatic backdrop of the Bear Creek drainage is extraordinary and arguably contributes to the scenic ORV.

Recreation: I disagree with GMUG Planning team's assessment that recreation along this National Recreation Trail is not river-related. Without the resulting carving of Bear Creek by the flowing river, this trail would not enjoy the popularity it holds for local residents and visitors alike. The USFS trail register monitored by the Ouray Trail Group indicates just over 2,600 and nearly 2,900 people hiked the trail in 2016 and 2017 respectively (with fewer in 2018 due to trail closure.) Studies have shown that typically only a third of users sign in, therefore one could estimate 7,500 to nearly 9,000 hikers utilize the Bear Creek Trail annually. People hike this trail BECAUSE of the river and the values it provides users including but not limited to the spectacular vistas and diverse geological

features. In accordance with the eligibility criteria related to river-related recreation opportunities, I have engaged in or witnessed other users sightseeing, wildlife watching (for me an amazing honey-colored black bear along with elk, mule deer, bighorn and various raptors,) photographing, camping, hiking and hunting. No one floats or rafts this river for obvious reasons!!

Geology: As mentioned above in the "scenic" section, Bear Creek is home to spectacular and varied geological features from gorges to intrusions to volcanic pinnacles. Perhaps most notable are the fossilized tidal ripple marks. Given that, according to eligibility criteria, (p. 4) "ORVs are defined as unique, rare or exemplary features that are significant within the associated regions of comparison. They are conspicuous examples of these values and among the best representatives of these features. Only one such value is needed for eligibility," I would argue that Bear Creek is eligible based solely upon this geologic feature. In addition, the San Juan geologic formation of volcanic tuff (easily eroded) results in dramatic cliffs and spires atop the much older and resistant slate and quartzite of the Precambrian Uncompahgre Formation that is traversed in multiple places along the trail as is exposed by the river's carving. Throughout the entire river corridor and at the confluence of the main and south fork of Bear Creek, the geology is imposing and spectacular and worthy of ORV status.

In summary, Bear Creek was found eligible in 2005 and remains so today due to the multiple ORVs described above. Thank you for the opportunity to comment and please see that Bear Creek retain its 2005 eligibility and be found eligible in your current evaluation.

Sincerely,
Robyn Cascade