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Organization:

Title:

Comments: Wild and Scenic Draft Eligibility Report Comments

Dear Ms. Duffy,

As an avid paddler, fisherman, and outdoor enthusiast, I am writing to comment on the GMUG Draft Wild and Scenic River Evaluation. The Forest's Eligibility Inventory should include ALL rivers that are free-flowing and possess at least one ORV, and the Draft Eligibility Evaluation is missing numerous river segments that qualify. In addition I believe that the fisheries evaluation process sets the bar too high for protection. Native cutthroats are disappearing quickly in the Upper Gunnison watershed, and all streams with a native population, not just green lineage Colorado Cutthroat should be protected. I encourage you to review Outdoor Alliance's GMUG Mapping Tool and American Whitewater's National Whitewater Inventory to inform the Final Eligibility Evaluation.

I want to applaud the Forest Service for recognizing both Oh-Be-Joyful and Copper Creek in their Draft Eligibility Report.

Oh-Be-Joyful draws paddlers not just from Colorado, but from across the world. As a paddler I've had OBJ on my radar since the early 2000's and since moving to the Gunnison Valley I've met people from France, Canada, and every corner of the U.S. on this stretch of whitewater. Its economic benefit to the Valley can not be understated, and its recreational value is unparalleled.

Copper Creek is another great inclusion in the Draft Eligibility Report. Not only is it important to protect the brood stock of the Boreal Toad, it also supports a healthy population of cutthroat trout. Within the last few years an introduction of brook trout above Judd Falls has begun to wipe out the native cutthroat in the lower portions of Copper Creek. Unless stopped quickly these non-native fish will spread to the upper reaches and the GMUG will lose another population of native fish.

In reviewing the Draft Eligibility Report, I believe there are several reaches that were bypassed for inclusion based on the minimal reporting from Appendix W-2 of the 2005 study. These reaches include East Brush Creek, Ruby Anthracite and the main stem of the Anthracite, Upper Cochetopa Creek, Poverty Gulch, and the East River from Gothic to Brush Creek Rd.

East Brush Creek and Upper Cochetopa Creek should be included in the eligibility report because of their fisheries value. Both include solid populations of cutthroat trout throughout their reach. Not only are these populations threatened from non-native introduction of brook and brown trout, they also provide some of the most beautiful trout fishing in our valley. Cochetopa Creek in particular is one of the most beautiful backcountry fishing destinations in Colorado. From its headwaters on San Luis to Dome Lakes SWA, the creek is remote and supports a variety of wildlife. While East Brush Creek does not have the same scenic value, it does support a population of cutthroats worth protecting.

Ruby Anthracite and the main stem of the Anthracite from Lake Irwin to Erickson Springs Campground deserves inclusion on a variety of ORV's. Recreation and Scenic qualities are the highest on the list. In 17 years of paddling, I am hard-pressed to find a more beautiful and fun stream for whitewater recreation. The cleft of the Dark Canyon is unique, not just in Colorado, but the world. Nowhere else I've paddled has a deep canyon cut through laccolithic morphology. The main run that is starting to get popularized begins where Trail #836 reaches the Ruby Anthracite and ends at Erickson Springs. It's only in recent years that paddlers have started to run this section with regularity, and it's quality and scenic value make it something that could attract paddlers throughout

the state in years to come. Putting in and staring up at a 300 ft. waterfall cascading off Marcellina Mt. is an image I'll carry with me for the rest of my life. This link includes a rough, uncut video of the upper section of this run and includes that waterfall about one minute in.

In addition to Oh-Be-Joyful, paddlers flock to the Upper Gunnison watershed for several other creeks that deserve eligibility status. Poverty Gulch and the Upper East River from Gothic to Brush Creek Rd. are very unique sections of whitewater. Poverty Gulch is the highest altitude creek run in the valley and includes an amazing 20' clean waterfall in the shadow of Mineral Point. It is a step down in difficulty from Oh-Be-Joyful so it provides a good step-up run for paddlers looking to test themselves on the unique feel of Crested Butte whitewater. The Upper East is another popular section of whitewater for the same reason. It's recreational and scenic values include the commonly run whitewater section from Gothic to Stupid Falls which features great views of Gothic Mt. and quality Class IV whitewater. The lower section below also has high scenic value as the river falls into the lower Mancos Shale layer and begins its braids and oxbows all the way to Brush Creek Rd.

Thank you for all your hard work on the Draft Eligibility Report and for considering my comments on the inclusion of several of these additional reaches.

Sincerely,

Daniel Kreykes

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Gunnison-Crested Butte

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