

Data Submitted (UTC 11): 3/23/2019 5:00:06 AM

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Organization: Northern San Juan/Ouray chapter Great Old Broads for Wilderness

Title: Leader

Comments: Dear GMUG Forest Planning Team,

The Northern San Juan chapter of the national organization Great Old Broads for Wilderness appreciates the opportunity to comment on the Wild & Scenic River Eligibility Evaluation. Our chapter represents over 400 supporters across three counties - Montrose, Ouray & San Miguel. Our organization signed on to a joint letter drafted (with input from us) by American Rivers and submitted to you on March 19. We support all the comments in the joint letter and wish to submit comments on segments in our region most familiar and treasured by our members.

We unequivocally agree with your evaluation that Cow Creek and its tributaries - Wetterhorn Creek, Wildhorse Creek and Difficulty Creek - are eligible and wild. Their pristine waters and dramatic geological and scenic features exceed the Outstanding Remarkable Values (ORVs) required for eligibility. Similarly, we support your evaluation that the San Miguel River, Roubideau Creek and its tributaries, Tabogauche Creek and its North Fork, North Fork Escalante and Kelso Creek are all eligible. We appreciate your acknowledgement of the ORVs along each and every one of these segments.

We want to emphatically emphasize that segments found eligible in the 2005 draft evaluation must retain their eligibility or be added to the streams studied in the current draft eligibility evaluation and found eligible. We ask that you err on the side of protecting segments rather than finding cause to eliminate their eligibility. We further note that, in the case of streams found eligible in 2005 and not deemed eligible in your current draft, there exists no explanation as to the reasons those segments were withdrawn from eligibility. The evaluation process requires that documentation of changed conditions and circumstances must accompany any decision to remove a segment from eligibility. No such reporting exists in the current draft report. Therefore, the following segments should retain their eligibility from 2005 or be studied and found eligible barring any findings of degradation:

*Bear Creek (which our members hike multiple times annually during all seasons and which have experienced no negative changes since 2005)

*Bridel Veil Creek/Falls

*Ingram Falls

*Escalante Creek

We also wish to draw attention to segments of the following streams (described in our joint comments,) which meet the eligibility criteria of free-flowing with one or more outstanding remarkable values:

oCottonwood Creek

oMonitor Creek

oPotter Creek

oHorsefly Creek

on the Uncompahgre Plateau, the first three of which have segments found eligible by the Uncompahgre Field Office of the BLM during its Resource Management Plan revision process.

oBeaver Creek

oFall Creek

in San Miguel County.

We ask that you consider all six of these streams for eligibility, which are notably absent from the current draft evaluation report.

Thank you for consideration of our comments. Our local Northern San Juan members appreciate the ongoing collaboration we enjoy with the USFS - not only through this forest revision process, but also as wilderness solitude monitors and stewardship volunteers. Thank you for your attention to the management of our public lands!

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