

The Wilderness Society
Audubon Colorado • Center for Native Ecosystems
Colorado Environmental Coalition • Colorado Mountain Club
Colorado Trout Unlimited • Colorado Wild
San Juan Citizens Alliance • Sheep Mountain Alliance • Sierra Club
The Nature Conservancy • Western Colorado Congress
Western Resource Advocates • Western Slope Environmental Resource Council

c/o 1660 Wynkoop, #850
Denver, Colorado 80202

August 17, 2010

Bureau of Land Management
Uncompahgre Field Office
Attention – RMP Revision
2465 South Townsend
Montrose, Colorado 81401

Greetings,

Thank you very much for the opportunity to comment on the potential suitability, under provisions of the Wild and Scenic Rivers Act, of certain stream segments in the Uncompahgre Field Office planning area. Please carefully consider the following comments and recommendations as part of your deliberation and decisions about these important streams and stream corridors.

(We will also submit these comments in the comment-form format provided by the BLM.)

General comments and recommendations

The Wild and Scenic Eligibility Report for the Bureau of Land Management (BLM) Uncompahgre Planning Area (issued as a component of the field office's Resource Management Plan (RMP) revision process, provides helpful base information about area streams with potential for inclusion in the National Wild and Scenic Rivers System.

In particular, the draft report's detailed background data, maps, and initial analysis of flows and values in the streams considered is very helpful.

Coordinated review, planning, and protection

Eligibility determinations for streams flowing through the Uncompahgre Field Office (UFO) Planning Area *and* through adjacent federal land planning areas should provide protective status equal to or stronger than that provided in adjacent planning areas. That is, any UFO streams with segments found suitable in adjacent areas should also be found suitable. Any stream segments not found suitable in adjacent areas should still be considered for suitability in the UFO area.

This is especially important in the protection and enhancement of riparian ecosystems that span the various federal land management areas and offices, as decisions in one portion of a stream can have significant impacts on downstream portions of the same stream. This type of coordination is warranted, even expected, under the terms of the *Unified Federal Policy for a Watershed Approach to Federal Land and Resource Management, October 2000*.

Dolores River

The Dolores River fits this cross-jurisdictional situation. This regionally significant river warrants consistent and coordinated status, management, and protection through its entire public lands reach. Long-existing suitability status for Dolores segments in the Grand Junction Field Office planning area and in the San Juan Public Lands planning area warrant corresponding suitability status and protective management for segments in the UFO planning area.

Related, all tributaries to the Dolores River contributing significant volumes of streamflow or seasonally unique or important streamflow should be determined suitable and correspondingly managed to protect the tributaries' outstandingly remarkable values and the streamflows related to ORVs, both in the tributaries themselves and in the Dolores River downstream.

San Miguel River

The San Miguel River is another regionally significant and iconic stream that flows through the UFO planning area. In addition to the San Miguel's inherent stream-related outstandingly remarkable features, the river also provides an important contribution to stream flows in the Dolores River downstream of the confluence of the two rivers. This contribution to Dolores flows is particularly important when Dolores flows are constricted by operation of the McPhee Dam. With imperiled native fish populations identified as surviving just below the confluence, San Miguel flows reflecting a natural hydrograph (to the greatest extent possible in the context of existing water rights) need to be protected. Suitability determination for the full length of the San Miguel through the UFO planning area, and for significant tributaries to the river, is a key component of protection for the river itself and for unique natural features downstream.

Roc Creek

Current eligibility status for Roc Creek segments in the Manti-La Sal National Forest management plan warrant equal or stronger status and protection for segments in the UFO planning area, where Roc Creek traverses unique and sensitive areas with wilderness characteristics (both as identified by citizen inventory and by the BLM's own wilderness characteristics review) and other unique stream-related features.

The UFO's failure to find Roc Creek even eligible is doubly incongruous, both in light of those remarkable stream-related values and in light of the Manti-La Sal National Forest's determination that its portion of Roc Creek is eligible (with Wild classification and with Scenic and Geologic/Hydrologic Outstandingly Remarkable Values identified). This

should be corrected with UFO affirmation of Roc Creek's eligibility, plus determination that it is suitable.

Specific segments

Each stream segment included in the final Eligibility Report warrants a BLM finding of suitability and recommendation to Congress for addition to the National Wild and Scenic River System. Each stream segment provides important streamflows and unique values that warrant that additional analysis and related protection. Several stream segments are especially important because of their regional significance, connection and complement to other streams and stream corridors, and connection to other public lands values.

Lower Gunnison Unit

Cottonwood Creek

18.27 miles; Scenic; Vegetation (cottonwood/riparian)

This stream is an important feature associated with adjacent lands with wilderness character and included in citizen wilderness proposal lands. Those wilderness values should be considered as part of this streams wild and scenic evaluation.

The stream provides support for a thriving diverse riparian community, rare in this otherwise arid landscape, and adding corresponding high-quality water to the private lands downstream and to the Gunnison River.

Federal ownership of lands in the stream corridor is 100%, simplifying manageability and warranting strong protective federal management.

We recommend that the full length of the Cottonwood Creek segment be found suitable.

Escalante Creek, segment 1

8.45 miles; Scenic, Scenic; Recreational, Geologic, Wildlife, Vegetation

This stream boasts stunning beauty of its own. It also contributes important streamflows to geographically significant streams and public lands downstream. The uniquely healthy riparian corridor in this segment supports globally unique plant species, as noted in the BLM's Final Eligibility Report.

The mixture of ownership may provide some management challenges, but the important features of the stream and corridor warrant the extra effort that might be necessary to resolve cooperative management, and certainly warrants active protective management for the federally owned portions.

We recommend that the full length—or, at least, the federally owned portions—of this Escalante Creek segment be found suitable.

Gunnison River, segment 2

.41 mile; Recreational; Fish

This regional significant river warrants careful review and enduring protection as an important recreational opportunity and as the hydrologic heart of unique adjacent public lands.

This river segment, short as it is, provides critical and healthy habitat for endangered native fish, as identified in the BLM's Final Eligibility Report.

Federal ownership of corridor lands along this segment is 100%, simplifying the implementation of protective management.

We recommend that the full length of Gunnison River segment 2 be found suitable.

Gunnison River, segment 3

17.48 miles; Recreational, Fish, Cultural, Vegetation

This regional significant river warrants careful review and enduring protection as an important recreational opportunity and as the hydrologic heart of unique adjacent public lands.

This river segment provides critical and healthy habitat for endangered native fish and/or fish species of concern, popular recreational opportunities, and an extensive wealth of cultural features, all as identified in the BLM's Final Eligibility Report.

The mixture of land ownership along this segment may present some challenges to protective management, but its high value warrants the extra effort that might be necessary for success. The predominance of federal ownership (80.2% of the length) makes it possible to effectively manage those portions.

Monitor Creek

9.42 miles; Wild; Vegetation (cottonwood/riparian)

This stream is an important feature flowing through the heart of federal lands with wilderness character and characteristics, which are included in citizen wilderness proposal lands. The stream is also associated with congressionally designated national forest lands upstream. Those wilderness values should be considered and protected through strong protective management for this stream and its corridor.

Protection of this stream will benefit private lands downstream and help ensure continued healthy streamflow contribution to the Gunnison River.

Federal ownership of corridor lands along this segment is 100%, simplifying the implementation of protective management.

We recommend that the full length of the Monitor Creek segment be found suitable.

Potter Creek

9.82 miles; Wild; Vegetation (cottonwood/riparian)

This stream is an important feature associated with adjacent lands with wilderness character and characteristics, which are included in citizen wilderness proposal lands. Those wilderness values should be considered as part of this streams wild and scenic evaluation.

This stream is an important feature flowing through and enhancing lands with wilderness character, which are included in citizen wilderness proposal lands. The stream is also associated with congressionally designated national forest lands upstream. Those wilderness values should be considered and protectively managed as part of this streams wild and scenic evaluation.

Federal land ownership through this segment is 100%, simplifying the effective implementation of protective management.

We recommend that the full length of the Potter Creek be found suitable.

Rose Creek

3.9 miles; Wild; Scenic

This is an important tributary of Little Dominguez Creek, which itself flows through the Dominguez Canyon Wilderness. Congressional designation of that wilderness specifically called for effective protection of streamflows and associated natural values in Little Dominguez Creek. Correspondingly, the careful protection of streamflows and healthy riparian corridor along Rose Creek is essentially to the fulfillment of that congressional recognition and mandate.

Federal land ownership along this segment is 100%, simplifying the effective implementation of protective management.

We recommend that the full length of the Rose Creek segment be found suitable.

Roubideau Creek, segment 1

10.71 miles; Wild; Recreational, Wildlife, Cultural, Vegetation

This stream is an important feature flowing through and enhancing lands with wilderness character and characteristics, which are included in citizen wilderness proposal lands. The stream is also associated with congressionally designated national forest lands upstream. Those wilderness values should be considered and protectively managed as part of this streams wild and scenic evaluation.

Federal land ownership along this segment is 93%, simplifying the effective implementation of protective management.

We recommend that the full length of the Potter Creek be found suitable.

San Miguel Unit

Beaver Creek

14.25 miles; Scenic; Vegetation (rare cottonwood-spruce-alder community)

Traversing a narrow corridor of public land, this stream holds important potential for preserving and enhancing stream-related natural values for a broad, otherwise private-land, geography. The creek is also an important contributing tributary to the San Miguel River.

Federal land ownership of nearly 100% will simplify effective implementation of protective management.

We recommend that the full length of Beaver Creek be found suitable.

Dry Creek

10.49 miles; Wild; Scenic, Geologic

This stream traverses a uniquely un-roaded landscape, providing important wildlife support and general ecological vibrancy. It is also a seasonally large streamflow contributor to the San Miguel River.

The very distinctive scenery and geology of the area—formed in large part by the creek itself—warrant strong protective management for the stream and corridor.

Nearly 100% federal ownership of land along the stream corridor, and extensive federal land beyond the corridor, simplify effective implementation of protective management.

We recommend that the full length of Dry Creek segment be found suitable.

Naturita Creek

24.97 miles; Scenic; Fish

This rare habitat for exemplary populations of endangered native fish and/or fish species of concern warrants the strongest possible protection, for both streamflows, related corridor vegetation, and water quality.

While the low percentage of federal ownership along the corridor might preclude a finding of suitability or wild & scenic designation, other immediate, effective, and enduring administrative protections—including cooperative measures with landowners

and with other government agencies—should be included in the resource management plan and its implementation.

Saltado Creek

5.56 miles; Wild; Vegetation (rare cottonwood-spruce-alder community)

Traversing a relatively narrow corridor of public land, this stream holds important potential for preserving and enhancing stream-related natural values for a broad otherwise private-land geography. The creek is also an important and reliable streamflow-contributing tributary to the San Miguel River.

The healthy and remarkably undisturbed nature of this segment's riparian vegetation and soils, worthy of strong protection itself, helps ensure clean streamflow in the San Miguel River.

100% federal land ownership along the lower four miles of the segment simplifies effective implementation of protective management.

We recommend that the full length—certainly the federally owned portion—of Saltado Creek segment be found suitable.

San Miguel River, segment 1

27.23 miles; Recreational; Scenic, Recreational, Wildlife, Historic, Vegetation, Paleontology

This large, regionally iconic river is inherently significant, and it provides important streamflow contribution to the Dolores River, itself severely diminished above its confluence with the San Miguel. This flow contribution is particularly important for the surviving population of endangered native fish, and/or fish species of concern, inhabiting the portion of the Dolores River just below that confluence. With flows from the upper reaches of the Dolores still highly variable and generally low, the San Miguel flow contribution is critical and must be protected.

This segment includes unparalleled scenery and attendant natural and cultural features.

The patchwork of federal-private land ownership along the segment may complicate protective management, but the segment's features warrant the extra effort that might be necessary to secure a finding of suitability and to implement cooperative measures to protect those features.

We recommend that all of San Miguel River segment 1 be found suitable.

San Miguel River, segment 2

4.01 miles; Wild; Scenic, Recreational, Wildlife, Vegetation

This relatively short segment of the San Miguel River contains unusually undisturbed stream and corridor features, warranting the strongest possible protection. The corridor includes stunning geological and landform scenery, much of it formed by the river itself, along with a uniquely undisturbed and vibrant riparian ecosystem.

Federal land ownership along the segment is 100%, simplifying effective implementation of protective management.

We recommend that the full length of San Miguel River segment 2 be found suitable.

San Miguel River, segment 3

7.31 miles; Scenic; Recreational, Fish, Wildlife, Vegetation

This segment's uniquely wild condition affords recreational experiences important to local economy and to local sense of place. The segment also provides critical habitat for endangered native fish and/or fish species of concern, which must be protected in order to ensure continued local use of the river's flows.

While federal land ownership along the segment is only 72.5%, the bulk of private land is found at one location, facilitating the cooperative measures important for implementing protective measures essential for this segment.

We recommend that the full length of San Miguel River segment 3 be found suitable.

San Miguel River, segment 5

In addition to ensuring strong and enduring protection for the public lands segments of the river traversing primarily federal public lands, the BLM should engage landowners and other land managers in Segment 5 to ensure cooperative measures to a) protect a continuous healthy stream corridor and b) to ensure natural-hydrograph flow contributions to the Dolores River. These and other measures should be undertaken to, among other things, enhance and preserve important habitat for imperiled native fish noted in the BLM's Final Eligibility Report.

San Miguel River, segment 6

3.23 miles; Recreational, Fish, Historic, Vegetation

This final segment to the San Miguel River's confluence with the Dolores River is of critical importance to a) preserve the beauty and natural dynamics of the confluence, to ensure a final, reliable, and healthy contribution to streamflows important for imperiled native fish uniquely flourishing in the segment and just downstream from the confluence, and c) to protect and enhance the healthy native riparian vegetation along the segment.

While less than 70% of the land along segment is federally owned, 100% of the final two miles above the confluence is federally owned, facilitating effective implementation of protective management.

We recommend that the full length of San Miguel River segment 6—or at least the federal portion—be found suitable.

Tabeguache Creek, segment 1

3.61 miles; Wild; Vegetation

This stream traverses a uniquely un-roaded, wild landscape on public lands, providing important wildlife support and general ecological vibrancy along the stream itself, and complementing congressionally designated national forest lands protected upstream.

Reliable protection is also needed for the segment's uniquely and flourishing riparian vegetation communities, and noted in the BLM's Final Eligibility Report.

Federal land ownership along the segment is 100%, simplifying effective implementation of protective management.

We recommend that the full length of Tabeguache segment 1 be found suitable.

Tabeguache Creek, segment 2

11.57 miles; Recreational, Cultural, Vegetation

This segment contributes reliable and significant volume of streamflow to the San Miguel River, and the health of segment should be protected in order to maintain and enhance the quality of the contributed streamflows.

The segment's superior examples of unique stream-dependent riparian vegetation communities should themselves be preserved and enhanced.

Although less than 70% of the land along the segment is federally owned, 100% of the land immediately above the stream's confluence with the San Miguel River is federally owned. This facilitates effective implementation of protective management.

We recommend that the full length of Tabeguache Creek segment 2—or at least the federally owned portion—be found suitable.

Lower Dolores Unit

Lower Dolores River

10.53 miles; Scenic; Scenic, Recreational, Geologic, Fish, Wildlife

Few rivers in the southwestern United States boast the stunning scenery, distinctive and colorful geology, and outstanding recreation opportunities as those found along the Dolores River. The heart of a broader landscape of ecologically rich public lands (well beyond a one-quarter-mile-each-side wild and scenic study corridor), the Dolores River is an essential element of larger land values and of management decisions affecting those values. Because this iconic river is already significantly diminished and threatened by

river impoundment upstream of the UFO study area, every possible protection must be applied to the river and to its corridor. A decisive finding of suitability is essential to, and appropriate for, that protection.

The esthetically and economically important recreation opportunities provided by the Lower Dolores River segment present sufficient justification for protecting the natural appearance and health of that segment. The existence of healthy populations of regionally imperiled native fish, as noted in the BLM's Final Eligibility Report, make that protection even more important.

In conjunction with a finding of suitability, and protective management, for the San Miguel River segments upstream, corresponding protections for this segment complete an important recognition of the two rivers' importance, locally and nationally.

While just over 65% of the land along the segment is federally owned, 100% of the upper portion of the segment is federally owned. This facilitates effective implementation of protective management for that federal portion; it also facilitates—and warrants—cooperative agreements and actions in the lower portions, lined primarily by private land, to help complete that protective management.

We recommend that that full length of Lower Dolores River segment—or at least the upper federally owned portion—be found suitable.

North Fork Mesa Creek

8.53 miles; Scenic; Vegetation

This segment warrants the strongest of protective measures for two basic reasons. First is the BLM-recognized presence of globally imperiled narrowleaf cottonwood/strappleaf willow/silver buffaloberry riparian woodlands along the segment. Second, and related, the segment contributes perennial, high quality streamflows to Mesa Creek, and thus to the severely depleted Dolores River itself.

A finding of suitability for this segment corresponds to the BLM's separate finding of eligibility for the upstream segment of the North Fork (and, hopefully, finding of suitability for that upper segment). In any case, the Uncompahgre and Grand Junction field offices should confer and protect effective coordinated protective management for both segments.

While just over 68% of the land along the segment is federally owned, 100% of the upper portion of the segment is federal. This facilitates effective implementation of protective management, and facilitates the implementation of cooperative agreements and actions for portions of the segment lined with private land.

We recommend that the full length of North Fork Mesa Creek—or at least the federally owned upper portion—be found suitable.

Upper Dolores Unit

Dolores River, segment 1

Identified as eligible in the San Juan Public Lands Draft Resource Management Plan, this segment complements and is essentially a component of Dolores River segment 2. As such, its extensive and diverse outstandingly remarkable values and values-related flows, warrant the highest possible protection.

Such protections are described in our comments related to Dolores River segment 2, and we advocated those protections for Dolores River segment 1 as well.

We recommend that the full length of Dolores River segment 1 be found suitable.

Dolores River, segment 2

11.5 miles; Recreational; Scenic, Recreational, Geologic, Fish, Wildlife, Vegetation

Few rivers in the southwestern United States boast the stunning scenery, distinctive and colorful geology, and outstanding recreation opportunities as those found along the Dolores River. The heart of a broader landscape of ecologically rich public lands (well beyond a one-quarter-mile-each-side wild and scenic study corridor), the Dolores River is an essential element of larger land values and of management decisions affecting those values. Because this iconic river is already significantly diminished and threatened by river impoundment upstream of the UFO study area, every possible protection must be applied to the river and to its corridor. A decisive finding of suitability is key to that protection.

With the longest and most diverse list of outstandingly remarkable values (seven) recognized in this segment, the segment is eminently qualified for the highest possible protective status and measures.

The healthy presence of regionally imperiled native fish in this segment and downstream, as recognized in the BLM's Final Eligibility Report, the importance of protecting the stream and supportive corridor in this segment is greatly magnified.

Only 47% of land along the segment is federally owned, but 100% of the corridor land in the upper half of the segment is federal. This facilitates the effective implementation of protective measures in that federal portion and facilitates cooperative agreements and measures for providing similar protections to the rest of the segment.

We recommend that the full length of Dolores River segment 2—or at least the federally owned upper portion—be found suitable.

La Sal Creek, segment 2

4.52 miles; Scenic; Fish, Vegetation

This stream traverses a distinctive canyon corridor, affording a stunning backdrop to outstanding recreation opportunities. The stream itself provides important streamflow source for the Dolores River, and it includes essential and healthy riparian environment in an otherwise arid area.

The presence of healthy populations of regionally imperiled native fish, and the presence of globally rare riparian ecosystem, provide complete justification for the strongest possible protective status and measures in this segment. In addition, the segment provides essential streamflows and healthy continuity for riparian habitats in the Dolores River Canyon Wilderness Study Area immediately downstream, and to the Dolores River itself.

Federal land ownership along the segment is 84.5%, facilitating effective implementation of protective management, particularly in the upper portion, which is 100% federal.

We recommend that the full length of La Sal Creek segment 2 be found suitable.

La Sal Creek, segment 3

3.37 miles; Wild; Scenic, Recreational, Fish, Cultural, Vegetation

If ever a stream segment were suitable under that definition of the Wild and Scenic Rivers Act, this is one. The segment lies wholly within the Dolores River Canyon Wilderness Study Area, supporting regionally rare riparian and scenic vibrancy. That habitat health is reflected in the presence of healthy populations of regionally imperiled native fish.

In addition, La Sal creek is among the more significant streamflow contributors to the severely depleted Dolores River.

Federal ownership of land along the segment is 100%, facilitating—and requiring—the strongest possible form of protective management.

We recommend that the full length of La Sal Creek segment 3 be found suitable.

Lion Creek

This stream traverses important un-roaded geography, including distinctive canyon features on both sides. It also contributes seasonal streamflows to La Sal Creek, which itself is so important to surround wilderness-quality lands and to the Dolores River.

While the length, location and federal ownership percentage of Lion Creek may not warrant a finding of suitability, the segment—and its streamflows—should be protected in other manners to ensure its continuing contribution to the health of the watershed.

Spring Creek

This stream traverses important un-roaded geography, including distinctive canyon features on both sides. It also contributes seasonal streamflows to La Sal Creek, which itself is so important to surrounding wilderness-quality lands and to the Dolores River.

While the length, location and federal ownership percentage of Spring Creek may not warrant a finding of suitability, the segment—and its streamflows—should be protected in other manners to ensure its continuing contribution to the health of the watershed.

Dominguez-Escalante National Conservation Area

Big Dominguez Creek, segment 1

The stream corridor for this segment has been designated by Congress as a component of the National Wilderness Preservation System. Meanwhile, the State of Colorado has approved the filing of instream-flow protection water rights for this stream segment. So long as those instream-flow rights are sufficient for wilderness purposes, and are actively implemented and protected, wild and scenic protection, including a finding of suitability, might not be necessary.

Big Dominguez Creek, segment 2

The stream corridor for this segment has been designated by Congress as a component of the National Wilderness Preservation System. Meanwhile, the State of Colorado has approved the filing of instream-flow protection water rights for this stream segment. So long as those instream-flow rights are sufficient for wilderness purposes, and are actively implemented and protected, wild and scenic protection, including a finding of suitability, might not be necessary.

Little Dominguez Creek, segment 1

The stream corridor for this segment has been designated by Congress as a component of the National Wilderness Preservation System. Meanwhile, the State of Colorado has approved the filing of instream-flow protection water rights for this stream segment. So long as those instream-flow rights are sufficient for wilderness purposes, and are actively implemented and protected, wild and scenic protection, including a finding of suitability, might not be necessary.

Little Dominguez Creek, segment 2

The stream corridor for this segment has been designated by Congress as a component of the National Wilderness Preservation System. Meanwhile, the State of Colorado has approved the filing of instream-flow protection water rights for this stream segment. So long as those instream-flow rights are sufficient for wilderness purposes, and are actively implemented and protected, wild and scenic protection, including a finding of suitability, might not be necessary.

Gunnison River, segment 1

This regionally significant river warrants careful review and enduring protection as an important recreational opportunity and as the hydrologic heart of unique adjacent public lands.

This river segment, short as it is, provides critical and healthy habitat for endangered native fish, as identified in the BLM's Final Eligibility Report.

Federal ownership of corridor lands along this segment is 100%, simplifying the implementation of protective management.

We recommend that the full length of Gunnison River segment 1 be found suitable.

Thank you again for carefully considering and including these comments in your deliberation over suitability determinations for these important streams. Please let us know any questions you have or if you need additional information from us.

Sincerely,

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