

**Audubon Colorado • Center for Native Ecosystems  
Colorado Environmental Coalition • Colorado Mountain Club • Colorado Wild  
San Juan Citizens Alliance • Sheep Mountain Alliance • The Wilderness Society  
Western Colorado Congress • NWWSERC/NFRIA/WSERC Conservation Center**

c/o The Wilderness Society  
1660 Wynkoop #850  
Denver, Colorado 80202

February 22, 2011

Barbara Sharrow, Manager  
Uncompahgre Field Office  
Bureau of Land Management  
Montrose, Colorado

Dear Ms. Sharrow,

The ten undersigned organizations participated in the recently concluded ad hoc stakeholders process reviewing management recommendations and potential suitability of seven stream segments for possible inclusion in the National Wild and Scenic Rivers System (stream segments previously listed by the BLM as eligible for consideration for such protection—*Final Wild and Scenic River Eligibility Report for the BLM Uncompahgre Planning Area, June 2010*). These organizations either participated directly in the stakeholders process or were represented by participants, consulting with and advising those representatives throughout the process.

Our organizations joined this effort in good faith that open and fair consideration would be given, by all participants, to the option of a wild & scenic suitability finding for at least some of the stream segments. While that openness was not broadly forthcoming among the participating stakeholders, our representatives did present detailed information on the values of, and need for protection for, select streams. We hope that information and our perspectives contributed positively to the discussion. We also appreciate very much the efforts of a few stakeholders, outside our delegation, in their pursuit of a greater level of agreement on at least some streams.

In large part because of the refusal of other stakeholders to even consider the possibility of a suitability finding for any stream, the group reached no consensus agreement on recommendations to the Bureau of Land Management (BLM). While a letter signed by some of the stakeholders, opposing any suitability findings, has been sent to the BLM as the so-called majority recommendations, that letter does not represent the full group of stakeholders. **There was no consensus.**

Correspondingly, we respectfully offer our collective recommendations regarding potential suitability findings, and protective management, for the seven stream segments. These recommendations build on suitability comments our organizations submitted to the

BLM in August 2010. They are supplemented with additional, updated, information and with new perspectives arising from the recent stakeholders discussions.

We thank you for carefully considering the details of these recommendations as you develop the range of alternatives for the pending resource management plan and, ultimately, as you settle on a final management plan.

The BLM's eligibility report was a very helpful starting point in the preparation of our original suitability comments and for our continued discussions of these streams with the BLM and with others. The level of detail provided, the careful research, and the professional presentation of that eligibility report have contributed to thoughtful review and discussion of these important streams.

Meanwhile, it is significant to note that Colorado has only one stream included in the National Wild and Scenic Rivers System. We trust that it is obvious that this is not because of a lack of outstanding streams in this state. Indeed, the BLM's eligibility report confirms that a long list of remarkable streams and stream corridors warrant special consideration and strong protection, whether under provisions of the Wild and Scenic Rivers Act or otherwise.

### **Stream segments**

#### **Gunnison River Segment 2**

*.41 mile; Recreational; Fish*

This regionally significant river warrants strong and enduring protection as an important recreational opportunity, as the hydrologic heart of unique adjacent public lands, and as essential habitat for at least two endangered species of native fish, along with three other species of ancient native fish that are imperiled, primarily because of loss of habitat or changes in river flows. (All these values are documented in the BLM's eligibility report.)

Federal ownership of the river segment is 100%. While only 66.5% of lands in the river corridor are federally owned, all those lands are on one side of the river, simplifying the implementation of protective management for those lands.

The primary need for the identified outstandingly remarkable values—particularly for the native fish—are reliable and seasonally natural flows of water in the Gunnison River. Other federal programs—primarily the Endangered Species Act—and evolving federal management efforts—including re-operation the Aspinall Unit dams upstream—contribute, or will contribute, to the reliability of those critical-habitat flows.

It therefore is not necessary to apply a finding of wild & scenic suitability to this portion of the Gunnison River, *so long as* those other federal measures are implemented and properly maintained. If those measures are either removed or fail to protect the native fish and their habitat, the BLM should reconsider a finding of suitability in future planning processes.

### 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 wilderness characteristics, which are included in a citizens' wilderness proposal. The stream is also associated with national forest lands upstream that have been congressionally designated for protection of wilderness values. These wilderness values should be considered and protected through strong protective management for this stream and its corridor.

The BLM's eligibility report's preliminary classification of this stream segment as wild affirms those wilderness characteristics and values, and further warrants strong protection for the stream and corridor.

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

In addition to the outstandingly remarkable values identified in the BLM's eligibility report (vegetation), the BLM should also identify and protect the unique and outstanding wildlife and recreation values found along this stream.

The landscape surrounding Monitor Creek is naturally contiguous with, and an essential ("regionally important") component of, the wildlife habitat (and Outstandingly Remarkable Value (ORV)) identified by the BLM for nearby Roubideau Creek (*desert bighorn sheep*). The features, condition, and importance of this wildlife habitat along Monitor Creek are of importance equal to that found along Roubideau Creek.

Recreation opportunities found in and near the Monitor Creek corridor correspond to the general wilderness character and wilderness characteristics for the area—specifically outstanding opportunities for solitude and for a primitive and unconfined type of recreation. While this type of recreation opportunity is slightly different from the recreational ORV identified by the BLM for Roubideau Creek (that ORV based primarily in the popularity of that stream corridor), the version found along Monitor Creek is an outstanding recreational opportunity nonetheless. Indeed, the more primitive and solitude-preserving recreation opportunities noted here for Monitor Creek are also present in Roubideau Creek, which is included, stream and corridor, in the Roubideau (Camel Back) Wilderness Study Area, thus necessarily defined by those same backcountry recreation opportunities.

Meanwhile, a finding of wild & scenic suitability for Monitor Creek—a finding most directly applicable to the lands in the stream corridor—will provide highly reliable and enduring form of protection for the continued health of the rare plant communities identified in the BLM's eligibility report (*narrowleaf cottonwood/strappleaf willow/silver buffaloberry riparian forest*).

Federal ownership of 100% of this stream segment, and of 96.2% of corridor lands along the stream simplify the implementation of protective management through a finding of wild & scenic suitability. The 104.9 acres of private land within the stream corridor are actually separate from the stream, further simplifying protective management, especially if that management were applied specifically to the federal lands.

We recommend that the full length of the Monitor Creek segment be found suitable, applicable at least to the federal lands in the stream corridor. The stream's outstandingly remarkable values should be expanded to include recreational opportunities and wildlife habitat.

### 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 a citizens' wilderness proposal. The stream is also associated with national forest lands upstream that have been congressionally designated for protection of wilderness values. These wilderness values should be considered and protected through strong protective management for this stream and its corridor.

The BLM's eligibility report's preliminary classification of this stream segment as wild affirms those wilderness characteristics and values, and further warrants strong protection for the stream and corridor.

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

In addition to the outstandingly remarkable values originally identified in the BLM's eligibility report (*vegetation*), the BLM should also identify and protect the unique and outstanding wildlife and recreation values found along this stream.

The landscape surrounding Potter Creek is naturally contiguous with, and an essential ("regionally important") component of, the wildlife habitat (and ORV) identified by the BLM for adjacent Roubideau Creek (*desert bighorn sheep*). The features, condition, and importance of that wildlife habitat along Potter Creek is of importance equal to that found along Roubideau Creek.

Recreation opportunities found in and near the Potter Creek corridor correspond to the general wilderness character and wilderness characteristics for the area—specifically outstanding opportunities for solitude and for a primitive and unconfined type of recreation. While this type of recreation opportunity is slightly different from the recreational ORV identified by the BLM for Roubideau Creek (that ORV based primarily in the popularity of that stream corridor), it is an outstanding recreational opportunity nonetheless. Indeed, the more primitive and solitude-preserving recreation opportunities noted here for Potter Creek are also present in Roubideau Creek. Roubideau Creek and its

corridor are included in the Roubideau (Camel Back) Wilderness Study Area, which is necessarily defined by those same backcountry recreation opportunities.

Meanwhile, the BLM's decision to remove the one outstandingly remarkable value originally identified in the agency's eligibility report is in error. The BLM's rather arbitrary distinction between a classification as critically imperiled globally (G1) and vulnerable throughout its range (G2) is not well founded. Glibly stated, rare is rare, and vulnerable is vulnerable.

Stated a bit more thoughtfully, a plant community that is currently vulnerable throughout its range warrants the highest possible level of protection in each of its occurrences, lest damage from human activity, climate change, or other harmful factors translate vulnerable to imperiled. The best way to avoid plant community failures in the future is an active protection in the present. A finding of eligibility, and accompanying protective management, is an appropriate and timely tool for this plant community.

In any case, a finding of wild & scenic suitability for Potter Creek—a finding most directly applicable to the lands in the stream corridor—will provide a highly reliable and enduring form of protection for the continued health of the rare plant communities identified in the BLM's eligibility report (*narrowleaf cottonwood/strapleaf willow/silver buffaloberry riparian forest*).

Federal ownership of 100% of this stream segment, and of 98.5% of corridor lands along the stream simplify the implementation of protective management through a finding of wild & scenic suitability. The 44.3 acres of private land are located at the far lower end of the stream segment, further simplifying protective management, especially if that management were applied specifically to the federal lands.

We recommend that the full length of the Potter Creek be found suitable, applicable at least to the federal lands in the stream corridor. The stream's outstandingly remarkable values should continue to include the highlighted vegetation communities, and they should be expanded to include recreational opportunities and wildlife habitat.

### 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, both within the long-standing Roubideau (Camel Back) Wilderness Study Area and in the larger citizens' wilderness proposal of the same name. The stream is also associated with national forest lands upstream that have been congressionally designated for protection of wilderness values. These wilderness values should be considered and protected through strong protective management for this stream and its corridor.

The BLM's eligibility report's preliminary classification of this stream segment as wild affirms those wilderness characteristics and values, and further warrants strong protection for the stream and corridor.

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

A finding of wild & scenic suitability for Roubideau Creek Segment 1—a finding most directly applicable to the lands in the stream corridor—will provide a highly reliable and enduring protection for the continued health of the ORVs identified in the BLM's eligibility report, including: rare plant communities (*narrowleaf cottonwood/strapleaf willow/silver buffaloberry riparian forest*); wildlife (*northern leopard frog, desert bighorn sheep*); cultural; and recreational (*primitive and non-mechanical exploration and exercise*).

Federal ownership of 93% of this stream segment, and of 94.8% of the land in the stream corridor simplifies the effective implementation of protective management.

We recommend that the full length of the Roubideau Creek Segment 1 be found suitable, applicable at least to the federal lands in the corridor.

#### Roubideau Creek Segment 2

The continued health of this stream segment is an important community and ecological priority, and the BLM's future management of its lands along that stream should ensure the continued vibrancy of the outstanding wildlife and vegetation values found there.

The relatively low percentage of federal land ownership along the stream and in the stream corridor (45.5%, 60.2%) makes management under a finding of wild & scenic suitability difficult. Other protective designations and measures should instead be used for Roubideau Creek Segment 2.

#### Deep Creek

The continued health of this stream segment is an important community and ecological priority, and the BLM's future management of its lands along that stream should ensure the continued vibrancy of the outstanding wildlife and vegetation values found there.

In particular, the critical rarity of greenback cutthroat trout warrants the highest level of protective management, especially management and cooperative measures to ensure reliable and seasonally natural stream flows.

The relatively low percentage of federal land ownership along the stream and in the stream corridor (22.7%, 15.8%) makes management under a finding of wild & scenic suitability difficult. Other protective designations and measures should instead be used

for Deep Creek, *so long as* those other methods continue to successfully protect the trout and its habitat.

#### West Fork Terror Creek

The continued health of this stream segment is an important community and ecological priority, and the BLM's future management of its lands along that stream should ensure the continued vibrancy of the outstanding wildlife and vegetation values found there.

The relatively low percentage of federal land ownership along the stream and in the stream corridor (39.2%, 47.5%) makes management under a finding of wild & scenic suitability difficult. Other protective designations and measures should instead be used for West Fork Terror Creek, *so long as* those other methods continue to successfully protect the trout and its habitat.

#### **Summary**

The undersigned organizations recommend that the BLM reach a finding of suitability, and implement corresponding strong protective management measures for:

- Monitor Creek
- Potter Creek
- Roubideau Creek Segment 1

The undersigned organizations recommend that the BLM implement the strongest possible protective management measures, other than a finding of wild & scenic suitability for:

- Gunnison River Segment 2
- Roubideau Creek Segment 2
- Deep Creek
- West Fork Terror Creek

Thank you again for your careful consideration of these comments and recommendations, as complement to the thorough research and review the BLM has already applied to these important streams and corridors.

Please let us know any way in which we can clarify these recommendations, expand on them, or assist with securing their implementation in the BLM's protective management of these streams.

Sincerely,



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for

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