



Mely Whiting, Legal Counsel, Colorado Water Project

January 17, 2012

Karl Mendonca, Acting Field Manager
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Colorado River Valley Field Office
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Silt, CO 81652
Via email: kmendonc@blm.gov

Dave Stout, Field Manager
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Kremmling Field Office
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Via email: dstrout@blm.gov

Scott Fitzwilliams, Forest Supervisor
U.S. Department of Agriculture
White River National Forest
900 Grand Avenue
Glenwood Springs, CO 81601
Via email: sfitzwilliams@fs.fed.us

Leigh D. Espy, Deputy State Director
Bureau of Land Management
2850 Youngfield Street
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Via email: lespy@blm.gov

Re: Trout Unlimited's Comments on the Wild and Scenic Portions of the Draft Resource Management Plans for BLM's Kremmling and Colorado River Valley Field Offices and the U.S. Forest Service's White River National Forest

Dear Mr. Mendonca, Mr. Stout, Ms. Espy and Mr. Fitzwilliams,

I am writing on behalf of Trout Unlimited to offer our comments on the above referenced matter. Trout Unlimited is a non-profit organization with approximately 140,000 members and 400 chapters nationwide. Our membership is mostly comprised of avid anglers who care deeply for the health of streams and the fisheries they support. Our mission is to conserve, protect and restore coldwater fisheries and their habitat.

Upper Colorado River – BLM Segments 4, 5, 6 and 7; USFS Segments 1 & 2

Trout Unlimited supports the adoption of Alternative B2 with respect to wild and scenic suitability determinations for these segments of the upper Colorado River. We are also a signatory of and endorse the letter submitted by the Upper Colorado River Wild and Scenic Stakeholder Group (Stakeholder Group) dated January 10, 2012.

Trout Unlimited is one of the founding members of the Stakeholder Group. Over the last four years, the group has spent countless hours working toward consensus on a management approach for these segments of the Colorado River that balances the needs of our very diverse constituency. The result of our efforts is the Upper Colorado River Wild and Scenic Stakeholder Group Management Plan (Stakeholder Management Plan), which is identified as part of Alternative B2 in each draft resource management plan. It is our understanding that, under this alternative, BLM and the USFS would retain and manage these segments of the Colorado River as "eligible" under the Wild and Scenic Rivers Act (WSRA) and adopt the Stakeholder Management Plan as the primary

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means of outstandingly remarkable value (ORV) protection. A suitability determination would be delayed. If at some point monitoring indicates that the Stakeholder Group Plan is not adequately protecting the free-flowing nature, ORVs, and tentative WSRA classification of these segments, BLM or the USFS would, as expeditiously as possible, initiate a process to evaluate suitability under the WSRA.

Trout Unlimited believes that the record supports a finding that these segments are suitable for WSRA designation. However, we also believe that implementation of the Stakeholder Group Plan offers a better alternative for protection of the outstanding values of this reach of the Colorado River in a cooperative setting. For this reason we strongly support the adoption of Alternative B2.

Deep Creek – BLM Segments 2b and 3; USFS Segments 1 and 2

For the reasons well articulated in the comment letter submitted on behalf of The Wilderness Society *et al.* and dated January 17, 2012, Trout Unlimited supports a finding of suitability (proposed in both preferred Alternative B and in Alternative C) for this outstanding stream. We further support other recommendations for these segments set forth in that letter.

Roan Plateau Streams

For the reasons well articulated in the comment letter submitted on behalf of The Wilderness Society *et al.* and dated January 17, 2012, Trout Unlimited supports a finding of suitability (Alternative C) and other recommendations for the outstanding streams within the Roan Plateau complex as set forth in that letter. We particularly endorse suitability designation and resulting interim protection management for streams within the East Middle Fork Parachute Creek and East Fork Parachute Creek complexes, as these streams have valuable and irreplaceable ORVs and most of them hold populations of extremely sensitive Special Status Species: the Colorado River Cutthroat trout and/or the Greenback Cutthroat trout.

Blue River – BLM Segments 2 and 3

Trout Unlimited initially supported a suitability finding for these segments of the Blue River. Given Trout Unlimited's understanding of ongoing, voluntary and cooperative efforts to protect and improve these segments of the river, particularly efforts downstream of Spring Creek Road (County Road 10), Trout Unlimited does not object to a BLM's determination that the segments are not suitable at this time.

Thank you for the opportunity to comment.

Sincerely,



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