

Summary of Scoping Comments

Wild and Scenic River Suitability Study for National Forest System Lands in Utah

Final Version – January 9, 2008

This Document Contains:

Summary of Scoping Comments

Summary of Scoping Comments on Rivers not Included in the Current Suitability Study

Appendix A – List of Agencies/Organizations and Letter Number

Appendix B – Coding Structure used to Categorize Comments

On April 30, 2007 a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) was published in the *Federal Register* for the Wild and Scenic River Suitability Study for National Forest System lands in Utah. To be most useful to the process, scoping comments were requested by June 30, 2007. As of July 19, 2007, the U.S. Forest Service had received approximately 2,750 comments in response to the NOI, mailings, web site, and public meetings. A draft document titled: Summary of Scoping Comments, Wild and Scenic River Suitability Study for National Forest System Lands in Utah, Draft Version – July 19, 2007 was posted on the web. An additional public meeting was scheduled July 26 in Monticello and approximately 30 additional letters (Letter numbers 243-270) were received in the months of July, August, and September. Although those additional letters were not formally summarized in a document until January 9, 2008, those letters were reviewed by the Wild and Scenic Rivers Team to determine if there were any new issues or information to be considered prior to the release of the Draft EIS in November 2007.

Scoping comments were collected and numbered (see Appendix A – List of Agencies/Organizations and Letter Numbers). Codes were placed on comments (see Appendix B – Coding Structure). Comments were then summarized and grouped according to code (see Summary of Scoping Comments). If comments were site-specific, a forest code was placed in front of the comment (e.g., Ashley National Forest = ANF; Dixie National Forest = DNF; Fishlake National Forest = FNF; Manti-La Sal National Forest = MLSNF; Uinta National Forest = UNF; and Wasatch-Cache National Forest = WCNF; Multiple Forests = MULTIPLE).

Summary of Scoping Comments

SF 100 – General comments.

We believe that a river segment that is nationally designated will require additional management responsibility, and will likely cause an increase in public use resulting in degradation of the designated river. (Letter 150, 151, 152)

We feel that designation may in some cases be more detrimental to these resources. For example, where designation is proposed to protect cultural resources which may draw attention to an invite pot hunting and vandalism. (Letter 252)

Requiring the agency to put together an objective list of uses that will be enhanced or foreclosed does not equate to a river being deemed unsuitable. (Letter 118)

WSRA legislative history suggests that some threat of future development does not render a river unsuitable. The reason to include rivers in system is to protect them before development occurs. (Letter 118, 209)

Priority should be given to studying rivers that are most threatened by developments which if they materialize would render the rivers unsuitable for inclusion in the NWSRS. (Letter 118, 209)

The council requests that the Forest Service outline how suitability factors will be applied, interpreted and weighted. (Letter 209)

Believe that several of the suitability factors the USFS is using such as economic impacts, socio-economic environment, support or opposition to designation landownership and land uses are not legally prescribed. These issues relate more to political considerations that are more appropriate for Congress suitability determinations than at the administrative level. I doubt the Wild and Scenic Rivers Act or its implementing regulations list many of these factors. The USFS should stick to suitability standards that are listed in the statute and leave the politics to congress. (Letter 243)

The suitability factors include several that are not discussed in the on-line narrative. Hence it is difficult to understand how the team evaluates the impact of designating a watercourse on future water development, mineral extraction, transportation, grazing, and recreation. How would designation of a watercourse affect these activities? (Letter 249)

DNF – The Moody Wash segment is unsuitable for management under the WSRA. There is a road nearby, providing easy access. Today, however, the segment is not widely renowned. If it were made more prominent, however, by designation into the NWSRS, more attention may be drawn to it, bringing deleterious impacts. Since there is no apparent threat of development that might affect this segment, designation may be doing more harm than good. (Letter 154)

DNF – Do not designate East Fork of Boulder Creek, from below the rim of the escarpment on Boulder Mountain to King's Pasture Reservoir because WSR will attract more visitors that will cause more impacts. Also, residents of Boulder depend on the water for irrigation. (Letter 21)

FNF – Millard County is opposed to designation of Corn Creek because future restrictions would likely follow designation. Designation would bring too much attention by the public in the future. (Letter 217)

SF 101 – (1) Land ownership and land uses.

No segment of any stream abutting private land should be deemed suitable. (Letter 19)

The Act and planning documents refer to condemnation, acquisition and exchange of private and state lands. These provisions contrast with the County's policy of no net loss of acreage, which is based on an extremely low percentage of private land contrasted with an extremely high percentage of federal land within the county, it does not address the potential conflict the issue raises. This issue should be fully addressed prior to suitability designations. (Letter 109, 110)

Several streams on the North Slope of the Uinta Mountains run through private land. None of the landowners are for this encroachment of federal regulation. (Letter 161)

ANF – Do not designate Lower Dry Fork River, South Fork of the Ashley Gorge, and Green River because designation may hinder use of water needed for domestic use, businesses, industry in the Ashley Valley, or water development projects. Lack of river maintenance and designation could result in diminished efforts by the government to protect life and property of the people of Ashley Valley. Designation would result in the public assuming they had access to river segments that flow onto private land. Private land owners don't want to give up access for the public or the government. (Letter 22)

ANF – Within the Ashley National Forest, private property ownership should not be a barrier to designation. Cost considerations should not be a significant obstacle since the area would not be managed much differently than it is now. Our major concern is the effect that water resource development outside the designation area would have on protected reaches of Ashley and Black Canyon. We hope the USFS would act aggressively to oppose future proposals that would dam Ashley Creek. (Letter 56)

DNF – North Fork Virgin River – It is unclear what the relationship of the proposed segment to the private property below Cascade Falls might be. That issue should be clarified. The USFS status currently offers protection to the water, resources, values, and land. Since the segment is immediately above or may even travel through private property, questions of private property impacts, water use, and net loss of private property in the county due to future acquisition needs to be addressed. Off segment public land and private property impacts are also a concern. Agency management's pledges that restrictions will be minimal are routinely broken as soon as designation is achieved. Broken pledges have minimized Kane County's reliance and trust in agency assurances regarding lack of impacts to the county's economic base and quality of life resulting from ever more restrictive federal land designations and management actions. (Letter 109, 110)

FNF – We oppose the designation of Fish Creek because the area has privately owned property that would be affected by designation. (Letter 126)

MLSNF – Huntington Creek – Private land ownership within and adjacent to the corridor makes effective management of the river corridor for the Wild and Scenic values unlikely. (Letter 77)

MLSNF – Huntington Creek drainage is mostly under administration of the USFS, with significant private land holdings dispersed along the streams and some ridges. Private property increases along the stream near the bottom of the canyon and are interspersed with BLM lands below the USFS boundary. (Letter 163)

MLSNF – Hammond Canyon opens on the lower end onto the Ute reservation. It has no trespassing signs everywhere and if any water runoff comes out of the canyon it is collected in ponds by Ute Tribe. I oppose any designation on this area. (Letter 256)

MLSNF – Hammond Canyon – Hammond Canyon land status is not well suited for designation. The canyon involves Forest lands Private lands State lands and BLM lands. This land status will affect management as Wild and Scenic Rivers. (Letter 265)

MLSNF – Chippean and Allen Canyons – Bayles Ranch is privately owned, as you point out. If Allen Canyon is designated, will the property owner’s land use be constrained? Would the Forest Service expect the landowner to participate in management of the watercourse? (Letter 249)

MLSNF – Chippean Rocks and Allen Canyon – The land status involving these canyons is not suited for a designation of this sort. The future need for water in this area because of private property as well as state property, makes it unwise to tie up the water in such a designation. (Letter 265)

MLSNF – *The current status of land ownership and use in the area.*

- San Juan County does not support Hammond Canyon as suitable for inclusion as a Wild and Scenic River. Hammond Canyon originates on the National Forest then crosses a portion of private land then back onto National Forest. The Canyon then enters Bureau of Land Management and another short segment of private land before its junction with South Cottonwood Creek. Neither the Bureau of Land Management or the Forest Service have considered the BLM portion of Hammond Canyon as eligible to be included as Wild and Scenic River status. There appears to be an inconsistency in evaluation between the BLM and Forest Service.
- Hammond Canyon - The final eligibility prepared by the Forest Service shows 9.72 miles on Forest System Lands, 0.12 miles on State Lands and 0.55 miles on private lands. San Juan County questions the accuracy of these figures. The County was unable to identify any lands owned by the State. The .55 miles listed as private lands also seems to be very much in error. This private land is owned by the White Mesa Ute Indians and is Tribal Trust Lands. These lands are located in the drainage bottom on both sides of the water course and includes considerably more than the .55 miles as indicated by the Forest. There is at least 1.50 miles located on the White Mesa Ute Indian private land. The historic use of this land as well as the legal descriptions, Treaties, etc. obviously show the private land along the stream course. It appears that, in determining length, the Forest Service used a digitized map which has displaced the private land slightly to the south.
- San Juan County does not support Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons or Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons as suitable for inclusion as a Wild and Scenic River. All of Dark Canyon is within the Dark Canyon Wilderness Area of the National Forest System.
- San Juan County does not support Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River. Mill Creek is located entirely on the National Forest.
- All of Chippean Canyon is on National Forest land. The upper reaches of Allen Canyon are also on National Forest. It then passes through and adjacent to two private land sections. It then remains on National Forest land to near the confluence of Chippean and Allen Canyons. Allen Canyon then enters private land (White Mesa Ute Indian lands) until it joins with South Cottonwood Creek. There are a few small sections of Bureau of Land Management land that the stream crosses below the forest boundary. (Letter 252)

MLSNF – *The estimated cost of the United States of acquiring necessary lands and interests in land and of administering the area, should it be added to the System.*

- San Juan County does not support Chippean and Allen Canyons or Hammond Canyon as suitable for inclusion as a Wild and Scenic River. Not only could the cost of acquiring necessary lands be substantial in the lower Hammond Canyon area but even identifying the owners and making contact with them may be extremely difficult and costly. This private land is owned by members of the White Mesa Ute Indians. These are not Reservation but rather Tribal Trust lands. The ownership is very complicated and convoluted with members of the tribe sometimes having a 1/100th interest in an acre of land. The tax rolls provides an example of the difficulty in identifying owners and doing anything with this land. Even though the land is eligible to be assessed for property tax, it remains untaxed. This is due to the large number of owners, the difficulty in identifying them, and the fact that ownership is constantly changing.

Each new family member is granted a share in the land. Even if the White Mesa Ute Indians were willing to sell these lands, the process for the Federal Government to purchase Tribal Trust Lands would be difficult and costly. It is also very doubtful that the Ute Indians would voluntarily sell lands or grant any type of easement for Wild and Scenic River designation.

- San Juan County does not support Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons as suitable for inclusion as a Wild and Scenic River. No lands need to be acquired. All lands are currently federally owned under U.S. Forest Service administration. (Letter 252)

UNF – The BYU Aspen Grove Family Camp and Conference Center is located in the North Fork Canyon of the Provo River, and shares a property boundary with the USFS. The North Fork of the Provo River enters the property on the west and continues through the property on the east. We own 65 acres on both sides of the river and the road.

This year, and for years to come, we have planned a number of new buildings and camp improvements to be built within a quarter mile of the river. We understand it is not the goal of this designation as a protected river to stop or discourage any of our plans for future development, but we would prefer not to be guided by federal land use and resource management objectives. We have no plans to dam our river or change its direction because of new construction.

We have a few roads next to and over the stream that we prefer not to be subject to congressional intent and river management objectives. These roads are our only access to some areas in our camp.

Aspen Grove is concerned about our spring near the river. The water collected by a clay dam is used in camp and throughout the canyon as a main source of water. We are concerned about protecting our rights to this water.

Aspen Grove is not in favor of the Wild and Scenic River Act for the North Fork of the Provo River. We would like to see it removed from eligibility in its entirety. If deemed eligible, we would like to have it end at the Aspen Grove Campground a quarter mile above us. (Letter 52)

WCNF – Private landowners within the eligible Blacks Fork segment object to any designation. The private landowners are the owners of the Historic portion of the stream that qualifies the segment as Historic and could mechanically eliminate the Historic evidence if the USFS continues to eliminate continued use by the public. There is a main graveled road within ¼ mile of the segment, which could cause a dust problem, which could curtail the continued use of the historic use of the existing roadway. There is an “Early Warning Site” on the Blacks Fork used to detect problems with the downstream dam, and access must be protected. (Letter 54)

WCNF – The Provo River from the North Fork to U35 Bridge has residential homes already built along it. (Letter 151)

WCNF – How would this impact the use of my land? The Logan River and Beaver Creek come together on my property. I don’t trust the USFS to protect my interest as a property owner within the forest boundaries. (Letter 97)

WCNF – The confluence of the Logan River and Beaver Creek are on privately owned ground that continues through at least two quarter sections at this point and may continue through others at points south of these sections. There are a least two existing bridges and plans for two or more bridges at this time within the tract 37. I don’t know about the south quarter section proposed bridges or development. In the north quarter section there are currently 21 owners and they have been waiting for the completion of the independent and dependent resurvey that was completed by the BLM February 2007. The survey and others have been ongoing for the past 8 years and have delayed the development of some of the included properties in this tract.

This area is used quite extensively by the cattle associations as free range and because of this there are planned fencing of properties in Tract 37 to help control the cattle, which are frequently around the river in this area. These fences could have visual impacts as far as wild and scenic.

There are also the possibilities of more than the six existing cabins on the Tract. Each of the 21 owners has the grandfathered right to build one cabin and one shed. This building may also have some visual impact to these sections. These owners are using their properties as recreational at all times of the year and I'm not sure what the impact of a "Wild and Scenic River" would do to their abilities to utilize their ownership. For these reasons, I am urging that these portions of the Logan River and Beaver Creek do not meet the eligibility criteria for inclusion in the National Wild and Scenic Rivers System. (Letter 127)

WCNF – Little Cottonwood Creek is regulated by a number of federal, state and local agencies. This segment extends through the Town of Alta municipal boundaries, unincorporated Salt Lake County, and the USFS Salt Lake Ranger District. Salt Lake City has extraterritorial jurisdiction to manage the Little Cottonwood Creek watershed as part of its culinary water supply, as well as primary water rights. In addition, the State of Utah has interest in the creek as a fishery; this section of Little Cottonwood Creek is classified by the state as a Coldwater Fishery.

This segment of Little Cottonwood Creek passes through public land managed by the USFS, Alta and Snowbird Ski resorts, and numerous parcels of private land owned by Alta Ski Lifts Co., Snowbird Corporation, and other private landowners. The corridor also includes State Highway 210 which is heavily traveled, especially Nov. – April. (Letter 111)

WCNF – Red Butte Creek – All title and interest in Red Butte Dam and Reservoir is held by the Central Utah Water Conservancy District for recovery of June Sucker and flood control. (Letter 142)

SF 102 – (2) Existing and potential water resources development.

WSRA says that a potential water resource development project would make a river segment a higher priority for being found suitable and having its values protected. This is backed up by case law. (Letter 118, 209)

Undeveloped areas or undeveloped waterways should remain that way unless there is a compelling reason to exploit them.

Requiring a compelling reason for developing undeveloped areas would mean that speculative futuristic possibilities should not drive the W&SR suitability phase. Rivers and streams should not be deemed unsuitable unless there are significant plans that demand their consumptive use. This is particularly true where the streams drain natural areas, which are substantially without man-made intrusions. These areas are biological and spiritual treasures. New places like these are not being created. Utah doesn't have that many left. It should do a better job of preserving the best of what it has. (Letter 103)

All eligible river segments originating in the Uinta, Wasatch and Bear River Mountains be identified as suitable for inclusion in the national Wild and Scenic River System. These rivers and their watersheds are under grave threat from various kinds of development, exploitation and resource extraction. Thus, they need protection. In addition, we are not aware of a single eligible river segment that does not satisfy the statutory criteria for suitability in the WSR. Nor are we aware of any conflicting land uses that should take precedence over suitability designation for these river segments. (Letter 155)

UWCD and OPIC is extremely concerned that like the ESA this WSR legislation will become more than it was originally intended to be. We are concerned that the unintended consequences may limit use of water not only along these segments but could and probably would control or at a minimum influence the management of water on segments above and below these potentially suitable segments. (Letter 71, 157)

The Federal Energy Regulatory Commission which licenses non-federal hydroelectric projects is not allowed to license projects “affecting wild and scenic rivers.” Other federal agencies may not assist with projects, which would have a direct and adverse effect on the “values” for which a river was designated. (Letter 109, 110)

Utah Division of Water Resources has reviewed water development studies and has compiled a list of potential reservoir sites. Sites located in Wilderness, under 1,000 ac-ft and those with a low probability of being built were eliminated. Final is list of credible options for replacement of reservoirs, storage that would allow additional development of Utah’s Colorado River allocations, or for development of tribal water rights. See accompanying list of reservoirs. (Letter 158)

District is opposed to designation within property boundary deeded to CUP – downstream on USGS stream gauging station. (Letter 142)

Duchesne County opposes designations outside of wilderness boundaries due to impact on long-term water development. (Letter 19)

Streams on the North Slope of the Uinta Mountains – These streams need no further protection. This has been provided by wilderness designations. What lies out of the wilderness areas have diversion points for irrigation, early warning system for flood control, timbering potential for fire control, and many other critical uses that must be maintained in multiple use. (Letter 161)

High Uintas – reservoirs at headwaters maintained and used for over 90 years. Opposed designation below any existing and used diversion structures. (Letter 123)

...Oppose designation on upper region of rivers until stabilization is completed. (Letter 123)

High mountain lake stabilization in the High Uintas Wilderness Area work needs to be done over the next 5 years. (Letter 142)

High Uintas – need to be able to access dams for repair work (Letter 142)

ANF – Fox and Crescent Lake have a Colorado Ditch Bill Easement. (Letter 123)

ANF – Garfield Creek – There are four reservoirs located in the Garfield Basin that dry-dam the streams for up to eight months of the year (normally mid-October to mid-June) in order to store water for their owners. These reservoirs will be stabilized in the future as part of the Central Utah Uintah Basin Replacement 203 Project, consequently, no designation should be considered on these reservoirs to stream areas prior to stabilization that could restrict storage rights or hamper stabilization work in the future. Two of these reservoirs (Five-Point and Bluebell) could be adversely affected by any designation as they are still used to store irrigation water. (Letter 55)

ANF – Our office is responsible for implementation of the Central Utah Project Completion Act (CUPCA). The Central Utah Project (CUP) is a participating project of the Colorado River Storage Project, a multi-state water resources development authorized by Congress for the Upper Colorado River Basin.

High Lakes Stabilization – Uinta Basin Replacement Project (UBRP), Bonneville Unit, CUP – As a major mitigation commitment of the Federal government for the Bonneville Unit, the Utah Reclamation Mitigation and Conservation Commission (Mitigation Commission) will stabilize 13 high mountain lakes to No-Hazard levels to provide constant lake water levels year-round. Nine of these lakes (Bluebell, Drift, Five Point, Superior, Water Lily, Farmers, East Timothy, White Miller, and Deer) are located in the Upper Yellowstone River watershed. Four (Brown Duck, Island, Kidney, and Clements) are in the Brown Duck Basin of the upper Lake Fork watershed. Work on Water Lily, Farmers and White Miller was completed in 2006; Clements will be completed summer 2007, and other lakes in the years ahead.

The Mitigation Commission is working closely with the Ashley NF on the planning and execution of this work in accordance with wilderness standards. Work will improve these lakes and streams aesthetically and otherwise by restoring natural hydrologic runoff patterns. Wilderness, recreation, and fishery values will be restored; and future operation and maintenance impacts will be eliminated in the wilderness area. The extent that Wild and Scenic designation will impede this restoration work, or render it more expensive or even infeasible, we would request that you take such factors into consideration in any recommendation. In addition to the UBRP high mountain stabilizations, CUPCA has committed funding for the stabilization of other high mountain lakes. Many of these storage lakes are in wilderness areas or other watersheds of the Ashley National Forest valued for their scenic beauty and recreation utility. Stabilizing these reservoirs and moving their storage downstream to lower elevation storage facilities will improve conditions for all concerned, including WSR proponents. Specific lakes have not been identified, we continue to work with Uinta Basin water users to assist them with their efforts. (Letter 208)

ANF – Rock Creek – Lower part may need to be rerouted, but not a conflict with designation. The district operates flow releases from Upper Stillwater Reservoir which affect lower Rock Creek. (Letter 142)

ANF – Upper Uinta River - There are three drainage basins that drain into the Uinta River (Krebs/Chain Lakes, Atwood Basin, and Shale Creek). All three basins have dams and water storage located in the upper reaches of those areas and their tributaries run into the Uinta River, hence a designation on the mainstem river may be a problem in the future for irrigators. These concerns could also be applied to the potential mainstem designations on the Whiterocks River because irrigation water is received from the headwaters of that river. DCWCD feels no designations should be made on mainstem watercourses that could hamper or impair water rights or affect water storage facilities that are located high in their respective basins. Designations above a confluence with storage facilities would be acceptable, but not below. (Letter 55)

ANF – Upper Uinta River – Fox and Crescent Reservoirs are both located in the upper portion of this segment and could be adversely affected by any designations. In 2006 there were Colorado Ditch Bill easements on both reservoirs issued by the USFS. We question why these reservoirs and surrounding watercourses were included in the suitability phase. These ditch Bill easements are private easements hence there should be no additional restrictions on these private reservoirs. DCWCD would also like to request that the area downstream of the dams be removed from eligibility, because in order to store water for late season irrigation the stream flow is shut off for over six months of the year. (Letter 55)

ANF – Uintah River has reservoirs - three Chain Lake and Atwood Lake. (Letter 123)

ANF – Uinta River Basin/Green River – Several potential reservoirs under consideration for the area. (Letter 142)

ANF – Uinta River has plans for future water resource development. (Letter 19)

ANF – Uinta River – designation would impact water development potential and ability to store water and timed releases. (Letter 142)

ANF – Lake Fork River, Yellowstone River, Garfield Creek and Uintah River – Moon Lake Water Users Association operates and maintains many storage facilities on these segments. Designations will have adverse effect on existing diversion or outlet structures. ...Opposed to any designations below existing diversion structures and are concerned with year-round flows that might be required which would infringe on water rights. (Letter 164)

ANF – We support designation for South Fork Ashley Creek, Black Canyon Creek, and Ashley Gorge Creek (Vernal Ranger District). We are land owners adjacent to Ashley National Forest. In Uintah County there have been many attempts to promote flood control initiatives that involve the Ashley Creek watershed. Most

recently, Ashley Valley Water Conservation District commissioned a study that would propose a dam on Ashley Creek near the confluence with Dry Fork Creek. No portion of this study considered the scenic, hydrological, historical, or wildlife attributes of the Ashley Creek system. Fortunately, the project was shelved due to lack of support from US Army Corps of Engineers. Flood control will no doubt be revisited in the future. Upstream effects of dam building are well documented and hopefully the designation would deter future efforts to consider Ashley Gorge as a potential flood control reservoir. Ashley Gorge and Ashley Creek is an important recharge zone for the entire Ashley Valley alluvial aquifer. Any dam would cut off the aquifer from its recharge source and cause severe damage to the primary aquifer used by all the residents of Ashley Valley. No consideration of this is addressed by county planners. (Letter 56)

ANF?? – Lower Whiterocks River – There is a Bureau of Reclamation (BOR) withdrawal site on the lower Whiterocks River that should be acknowledged by the USFS and removed from the suitability document and mapping. We would like to request that a thorough review be made of all BOR (or other entity) withdrawal sites located on the forests, not just this one on the lower Whiterocks River. All withdrawal sites should be acknowledged and removed from suitability document and mapping. (Letter 76)

ANF – There is a dormant proposal to build a “water production facility” along the Whiterocks River somewhere near the Ashley NF’s southern boundary. It seems this would place it outside the segments deemed eligible for Wild or Scenic River status. Even this proposal has not been formally made and may never be constructed. (Letter 103)

ANF – Whiterocks River - future water development project possible. (Letter 142)

ANF – Shale Creek – Fox and crescent lakes stabilization would affect flows in Shale Creek. Access needed. Water rights would need to be moved. (Letter 142)

ANF – Designation could prevent needed change to operations of river systems and control facilities. Operation of Flaming Gorge reservoir could be impacted by designation of Green River. Water rights settlements with tribes could be affected. Water storage rights held in high mountain lakes may be affected if in stream flows are mandated. These issues must be worked out with local water users before any recommendations are made. (Letter 158)

DNF – Moody Wash – The District is particularly concerned with protection of the watershed for purposes of enhancing water quality. In particular, with the drought and the fire cycle, becoming more severe with the invasion of cheat grass and repeated fires, we are opposed to any designation that would hamper the ability to manage the watershed appropriately. The District is opposed to the Designation of this segment as an eligible or suitable segment. (Letter 154)

DNF – Virgin River Drainage Area Agreement – The *Zion National Park Water Rights Settlement Agreement* (Agreement) was signed by Bruce Babbitt, Secretary of the Interior on December 4, 1996. The agreement addresses future water resource development above Zion National Park, specifically including Deep Creek, Upper North Fork Virgin River, Orderville Canyon, Clear Creek, East Fork Virgin River, and Shunes Hollow, among others. The Washington County Water Conservancy District agreed to abandon two major reservoir sites; one on the North Fork Virgin River and one on the East Fork Virgin River in the Barracks area of the Parunuweap Canyon. The agreement establishes terms and conditions for reservoir development, flood control structures and ground water protection zones up stream of the Park, specifically including the North Fork Virgin River and the East Fork Virgin River. The Agreement as a legally binding document allows, subject to limitations, new diversions and depletions within the river segments proposed for wild and scenic river designation in this planning effort. The Agreement should be analyzed as part of the eligibility/suitability process and it should be legally reviewed as to potential constraints limiting eligibility/suitability regarding affected segments. (Letter 109, 110)

DNF – East Fork of Boulder Creek – Garkane raises its concerns in light of the hydroelectric projects it currently operates downstream from the segment included on the eligible list. Although these facilities are not located within the eligible segment, Garkane is concerned that a determination of WSR suitability, or ultimate WSR designation for the eligible segment, could serve as a catalyst for federal and/or state agencies to impose additional operating and/or management requirements on Garkane beyond those included in the current licenses or already submitted by the USFS to the Federal Energy Regulatory Commission (FERC) regarding Garkane’s pending New License application for Project No. 2219. In addition, Garkane is concerned that the numerous limitations imposed through designation of the East Fork could inhibit actions necessary to maintain and improve the operation of its projects located downstream of the segment. To the extent the USFS nevertheless finds the East Fork of Boulder Creek “suitable” for WSR designation, Garkane asks the USFS to be mindful of the proposed relicensing conditions reflected in the settlement agreement among the USFS, the State of Utah, and Garkane filed in the FERC relicensing proceeding, and refrain from taking any steps or attempting to impose any obligations beyond those conditions.

...Because portions of both the Boulder Creek Hydroelectric Project and the Lower Boulder Creek Hydroelectric Project are located on the Dixie NF, Section 4(e) of the Federal Power Act entitles the USFS to submit any conditions it “shall deem necessary for the adequate protection and utilization of such reservations,” and FERC must include such conditions in the license ultimately issued. The USFS has not opposed the issuances of licenses for either Garkane project in recent years.

Of particular relevance, the USFS has played an active role in Garkane’s application currently pending at FERC to obtain a New License to continue to operate the Boulder Creek Project. (Garkane expects FERC to issue an order approving the New License application shortly.) In fact, the USFS and Garkane, along with the Utah Division of Wildlife Resources, reached a settlement agreement establishing the conditions the USFS would submit to improve the CRCT habitat downstream from the East Fork Reservoir.

...As agreed to by the USFS, this settlement agreement includes several useful measures designed to improve CRCT habitat. First, Garkane agrees to provide a minimum instream flow of 2 cfs from the East Fork Reservoir (unless a court of competent jurisdiction finds that doing so would impair the Boulder Irrigation Company’s senior consumptive water rights). Providing this additional water into the East Fork of Boulder Creek is expected to renovate the East Fork of Boulder Creek downstream, which can become dewatered at times during current operations. Second, the USFS, the Utah Division of Wildlife Resources and Garkane agree to participate in a Technical Coordination Committee to implement the Adaptive Environmental Monitoring and Management Program (AEMMP), which includes, in addition to the minimum instream flow provision, the removal of non-native fish and reestablish CRCT in the East Fork and the Boulder Creek and the monitoring of CRCT biomass, water flow, and water temperature.

Once these conditions submitted by the USFS take effect, they will work to improve the general health and beauty of East Fork of Boulder creek...If the USFS had serious concerns that the East Fork of Boulder creek warranted additional protections, such as WSR designation, Garkane believes the USFS would have demanded additional conditions in the Boulder Creek Project relicensing process. (Letter 270)

DNF – East Fork Boulder Creek – The East Fork and main stem of Boulder Creek already contain dams to collect water for operating hydroelectric projects. Moreover, it is possible that designation of the Creek could be used to impact the manner in which Garkane may be allowed to operate its facilities. In light of Garkane’s existing facilities and usage, in contrast with the large number of creeks with similar attributes in the region that do not currently contain any hydroelectric projects, the USFS efforts and resources would not be well served in designating the creek. (Letter 270)

MLSNF – The Narrows Project is a proposed dam and reservoir on Gooseberry Creek that will provide Sanpete County an annual supply of 5,400 acre-feet of water to alleviate shortfalls in water for growing population and agricultural needs. Additionally, the project provides fishing, camping, and recreational opportunities.

Any WSR suitability study should take into consideration the Narrows Project. Forest lands within the Narrows Project are subject to the first form withdrawal made by the BOR in 1941. The WSR study should also consider and provide for the underlying water rights that support the Narrows Project and which are held

by SWCD. Consequently, the WSR suitability study should provide for development of the Narrows Project. (Letter 125)

...Extensive studies have been performed by the BOR, USDA Natural Resources and Conservation Service, Utah Division of Water Resources, Utah Division of Water Rights, and SWCD. These studies provide the basis for the Narrows Project plan and all show that there is significant potential for water resources development in the Fish Creek segment watershed. SWCD is actively pursuing plans to develop an annual water supply of 5,400 acre-feet upstream from the Fish Creek segment.

Wild and scenic status of the Fish Creek segment would have detrimental effects on implementation of the Narrows Project. SWCD currently holds approved water rights, which allow it to store and divert all of the flows of Gooseberry Creek at the Narrows Dam site (Approx. 3 miles upstream from the Fish Creek segment). Any reserved water rights claimed by the U.S., including the USFS, are subordinate and junior to SWCD's rights per July 1989 stipulation between SWCD and the U.S. Department of Justice. SWCD asserts the USFS does not have sufficient water rights to manage Fish Creek as a WSR because any such management would unlawfully impair SWCD's ability to use its water rights.

The proposed Narrows Dam would be constructed on Reclamation withdrawn land. In order to develop the Narrows Project, SWCD needs a right-of-way permit from the BOR. SWCD also needs a loan from the BOR through the Small Reclamation Projects Act. SWCD also needs a permit from the Army Corps of Engineers under Section 404 of the Clean Water Act. SWCD has already applied for these two permits and for the federal loan.

If given wild and scenic status, the USFS would claim that development of the Narrows Project would degrade the ORVs of the Fish Creek segment, thus barring the two federal permits and federal funding described above. This action would make it impossible for SWCD to use existing water rights.

Additionally, the Narrows Project calls for several fishery and watershed improvements, which are designed to mitigate the adverse impacts of the project. Mitigation measures include streambank restoration, riparian plantings, and fencing to protect the stream from damage caused by grazing. The USFS requested that this mitigation occur within the Forest. Some of the proposed mitigation would be done within the Fish Creek Segment. Wild and scenic designation could preclude implementation of this mitigation. (Letter 125)

...Because of existing withdrawal of land for the Gooseberry Project, SWCD believes that the U.S. has already determined that the best use of Fish Creek is for water resources development. (Letter 125)

MLSNF – There has been an effort to utilize a water right in Fish Creek through the Gooseberry Narrows that began over 60 years ago.

The growth in the north part of Sanpete County is proceeding rapidly. New development is putting pressure on agricultural water. Without water, agriculture cannot survive and more land will be put into development. The rights to use this water should not be impeded by this wild and scenic rivers designation process. A dam at the Narrows site is needed to impound water that is now flowing into Carbon County.

We support the Narrows Project for a dam and the ability to use the water right. We encourage you to eliminate the Fish Creek and Narrows segments for designation. The designation does not meet the criteria of being outstandingly remarkable in its nature for the purposes of the Act and it may jeopardize the ability to utilize the water that is critical for the northern part of Sanpete County. Historical and existing rights need to be protected and it is felt that designation of these portions would harm these rights. (Letter 219)

MLSNF – The proposed Gooseberry Narrows Dam has made protection of these Creeks controversial. I would like to point out the objective of the Wild and Scenic Rivers Act– to preserve certain selected rivers or segments of rivers in their free-flowing condition. In other words, the goal of the Act is to protect a river and its values in its free-flowing condition from dams and diversions forever. For example, if river X has already been found eligible then it possesses some outstandingly remarkable value that causes it to stand out. If a water resource project were built on this river the value that the river was found to possess could be destroyed and lost forever, which is counter to the goals of the Act itself.

The Interagency Wild and Scenic River Coordinating Council further emphasizes this in the report on Wild and Scenic River Study Process. Regarding the Suitability and Recommendation of rivers, the report quotes from the Wild and Scenic Rivers Act,

“Section 4 (a) in part...In conducting these studies the Secretary of Interior and the Secretary of Agriculture shall give priority to those rivers:

- (I) with respect to which there is the greatest likelihood of developments, which if undertaken, would render the rivers unsuitable for inclusion in the national wild and scenic rivers system...”

Thus, a potential water resource development project makes the Creeks a higher priority for being found suitable and having its values protected.

I respectfully request that the Forest Service find Gooseberry and Fish Creeks suitable for protection. (Letter 210)

MLSNF – Do not designate Fish Creek and Lower Gooseberry Creek because of the Narrows Water Project. (Letter 1, 12)

MLSNF – The Sierra Club would like to point to an example of the illogical conclusions that rural politicians make in Utah. Designations for Fish Creek and Gooseberry Creek would aid Carbon County in its goal of preventing diversions of water from the Price River drainage. This is surprising in a county with a fairly progressive and very educated commission for counties south of Utah County. There seems to be such a fear of any protective designations that even those that could be helpful are rejected. (Letter 117)

MLSNF – The eligibility report incorrectly states that the Fish Creek segment extends [21.22] miles across the Forest Service System lands. In reality, about 1.25 miles of Lower Gooseberry Creek passes through privately-owned lands. About 1.5 miles of the stream passes through BOR and State of Utah School Trust lands. The BOR land within the Fish Creek Segment and thousands of acres upstream was withdrawn from the Forest Service system by the Secretary of the Interior in 1941 under authority provided by the Reclamation Act of 1902. This land was withdrawn for development of the Gooseberry Project, of which the Narrows Project is a component. SWCD is actively pursuing development of the Narrows Project and is working with the BOR to obtain a right-of-way permit for use of the withdrawn lands for project purposes. As evidenced by the withdrawal of lands, the U.S., acting through the Secretary of the Interior, has already determined that the best use of the Gooseberry Creek watershed is for water resource development. Bringing the Fish Creek segment under the protection of the W&SR Act would conflict with the existing designated use of the watershed. (Letter 125)

MLSNF – I strongly oppose designating the Fish Creek. Designating would hinder the work of 70+ years from residents of Sanpete County. In an effort to use water that rightfully belongs in Sanpete County our fathers and grandfathers have built the ditches, tunnels, and channels to bring Fish Creek water to the drought county farmers of Sanpete. There always seems to be some red tape that stalls this necessary project. It almost seems as if this project was invented as a permanent closure to the “Narrows Project.” (Letter 83)

MLSNF – The Narrows Project is a proposed dam and reservoir on Gooseberry Creek that will provide Sanpete County an annual supply of 5,400 acre-feet of water to alleviate shortfalls in water for growing population and agricultural needs. Additionally, the project provides fishing, camping, and recreational opportunities.

...The Narrows Project will alleviate many of the adverse effects the drought has brought to Sanpete County. The Narrows Project will finally allow Sanpete County to fully exercise its water right. The Narrows Project will provide another economic/recreational fishing and camping experience in our County. Fish Creek and Gooseberry Creek are not suitable for protection under the Wild and Scenic Rivers Act. (Letter 222)

MLSNF – SWCD has installed stream gauging stations, piezometers, survey control, and established cross sections for water surface profile studies and vegetation mapping. Stream gauging stations and piezometers have been equipped with automated data collection instrumentation. It is Sanpete County’s understanding that this data support limited impact to the ORVs and water quality of Fish and Gooseberry Creek. (Letter 222)

MLSNF – Protect Huntington Creek and its headwaters, and springs feeding it to prevent events like the ones that took place at Electric Lake in Huntington Canyon and in the Box Canyon along the Quitcupah Creek south of Emery, Utah. (Letter 6)

MLSNF – Huntington Creek and Huntington Creek Left Hand Fork – In Emery County’s suitability report, the significance of the industrial, agricultural and municipal water resources were clearly presented. Further development of these resources is likely and reasonable. (Letter 77, 78)

MLSNF – Huntington Cleveland Irrigation Company (HCIC) operates six storage reservoirs in the Left Hand Fork drainage. The release of water from the reservoirs completely regulates the flow of water through the corridor. HCIC is also considering construction of another reservoir facility in the lower canyon. The relationship of water flowing in Huntington Creek and other nearby streams is explained in the document. That report demonstrates that Left Hand Fork of Huntington Creek and Huntington Creek are part of a water delivery system, which meets the agricultural, industrial and municipal needs of communities within Emery County. The water flow is manipulated and regulated from top to bottom. (Letter 153)

MLSNF – PacifiCorp is against finding Huntington Creek and Left Fork of Huntington Creek suitable. The management of Huntington Creek and Left Fork of Huntington Creek, is critical to PacifiCorp’s ongoing operations. PacifiCorp:

- owns and operates the 31,000 acre fort water storage reservoir known as Electric Lake immediately above the Huntington Creek segment;
- owns approx. 1/3 the water shares in the Huntington Cleveland Irrigation Company, which in turn, owns and operates four separate water storage reservoirs;
- owns a private direct flow in Huntington Creek and a private storage right in Electric Lake. Both rights are utilized in PacifiCorp operations when they are available in priority.
- owns and operates the Huntington Power Plant located at the base of Huntington Canyon downstream from Huntington Creek and Left Fork of Huntington Creek. The plant receives its entire water supply via these creeks.
- owns and operates the Deer Creek coal mine and appurtenant facilities near Huntington Creek. PacifiCorp relies exclusively on two river crossings (via roads owned by Emery County) to access its mining facilities. (Letter 163)

MLSNF – Huntington Creek and Left Fork of Huntington Creek – Six major reservoirs impound water at the head of this drainage (five are privately owned, one State administered). Several smaller man-made dirt reservoirs also exist. Through a series of canals and diversions water can be diverted to Emery, Sanpete, or Carbon Counties. HCIC has multiple diversions for industrial, municipal, and agricultural use. Water in Huntington Creek and in the Left Fork is fully appropriated and almost all use is made possible by impoundment, off-river diversion and subsequent flow through river corridors.

Flows are artificially regulated. Until water loss and drought are remedied, it is essential that PacifiCorp continue to control river flow in cooperation with the USFS and other stakeholders.

Although there are no current plans for using Huntington River for hydroelectric generation, future economic conditions or technological advances could make that option viable or necessary.

Future impoundment by HCIC is being sought to better control, distribute, and preserve watershares for its owners. W&SR status up-stream could have a direct impact on the value and use of water shares administered by HCIC.

PacifiCorp is concerned that any designation will restrict options PacifiCorp must keep to maintain long-term viability of Huntington Power Plant.

As to the impact on federally assisted water resource development projects, PacifiCorp is proactive in promoting salinity projects with the end goal of local agricultural users using pressurized water delivery systems. These projects are typically subsidized at approximately 70%. The USFS should consider the impacts of W&SR status on these projects. (Letter 163)

MLSNF – Chippean Rocks and Allen Canyon – We are aware of long range plans for both the Water Conservancy District and the city of Blanding to use water from this area in the future. (Letter 265)

MLSNF – *Potential for water resource development.*

- San Juan County does not support Chippean and Allen Canyons as suitable for inclusion as a Wild and Scenic River. Blanding City and the White Mesa Ute Indians have plans to and/or currently using water from Allen Canyon for culinary or irrigation purposes. The potential for growth in San Juan County and its communities, such as Blanding, is very dependent upon the limited water supplies. Therefore the loss of any possible water supplies would have a very negative affect on the social, economic, as well as the ability to sustain current lifestyles of the people living in this area. Anything that would restrict the use of water from Allen and Chippean Canyons would meet with strong opposition from Blanding City, White Mesa Indians, private land owners, and San Juan County.
- San Juan County does not support Hammond Canyon as suitable for inclusion as a Wild and Scenic River. The White Mesa Ute Indians have used and/or have plans to use water from Hammond Canyon for culinary or irrigation purposes. Anything that would restrict this use would meet with strong opposition from the White Mesa Ute Indians and San Juan County.
- San Juan County does not support Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons as suitable for inclusion as a Wild and Scenic River. Potential for water resource development...None could be identified. Dark Canyon has no perennial water and therefore has little opportunity for water resource development. It is hard to imagine that Congress intended a basically dry drainage to be included in the Wild and Scenic River system.
- San Juan County does not support Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons as suitable for inclusion as a Wild and Scenic River. Potential for water resource development...None could be identified. Dark Canyon has no perennial water and therefore has little opportunity for water resource development. It is hard to imagine that Congress intended a basically dry drainage to be included in the Wild and Scenic River system.
- San Juan County does not support Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River. Due to the narrow confined canyon, it is unlikely that any impoundments or other water developments could occur in this segment of Mill Creek. Thus the need to protect it from such activities is not needed. However the water from Mill Creek is extremely important and diversions occur both above and below this proposed segment. For example shortly after exiting the forest boundary, Mill Creek is diverted to Kens Lake an important water storage reservoir for the Moab area. (Letter 252)

UNF – Little Provo Deer Creek – There is a water treatment diversion and other irrigation diversions on this section of the stream.

...CUWCD district operates an important gauging station and wetland protection here. (Letter 142)

UNF – Our office is responsible for implementation of the Central Utah Project Completion Act (CUPCA). The Central Utah Project (CUP) is a participating project of the Colorado River Storage Project, a multi-state water resources development authorized by Congress for the Upper Colorado River Basin.

Utah Lake System, Bonneville Unit – The Utah Lake Drainage Basin Water Delivery System (ULS) is the last planned component of the Bonneville Unit. It will bring water from Strawberry reservoir in the Uinta Basin through the Diamond Fork System on the Uinta NF to the Wasatch Front. As described in the ULS FEIS (Sept. 2004) and the October Supplement to the 1988 Definite Plan Report for the Bonneville Unit (DPR), hydropower will be developed in Diamond Fork under ULS. Our proposed Sixth Water power transmission line is planned to cross Fifth Water Creek, an eligible segment, probably on elevated power poles or towers. Land required for the power transmission facilities was withdrawn from the National Forest System under Public Land Order No. 7668 dated July 3, 2006. This may impact proposed scenic status of this creek and should be considered in any final recommendations. (Letter 208)

UNF – Fifth Water Creek – Syar tunnel maintenance requires diversion of water to holding pond in fifth water draining. Sometimes diverted water travel to Fifth Water Creek. (Letter 142)

UNF/WCNF – Many of the goals and objectives of W&S River program are consistent with and compliment PRWUA’s water quality interests. However, PRWUA is interested in monitoring the designation process to ensure that it does not adversely affect our ability to operate and maintain our facilities, and conduct a variety of activities within the Provo River and Weber River drainages which have traditionally been performed by PRWUA, and which are vital to our ongoing success.

...PRWUA is the local sponsor of the Deer Creek Division of the Provo River Project (PRP). The PRP was designed and constructed by the BOR to capture primarily winter and spring runoff waters which were not already appropriated by senior right holders, from the Provo, Weber, and Duchesne River drainages. The PRP includes the Deer Creek Dam and Reservoir, the enlarged Provo Reservoir Canal and Murdock Diversion Dam, the enlarged Weber-Provo Diversion Canal, the Duchesne Tunnel and Diversion Dam, and the Provo River Channel Revision.

...Congress mandated that the care, operation, and maintenance of BOR projects be assumed by the water user associations or other entities organized to repay the project construction costs, subject to rules and regulations prescribed by the Secretary of the Interior. (Letter 218)

UNF/WCNF – Water diverted and stored under the various Provo River Project (PRP) water rights from the Provo River drainage, Weber River drainage, and Duchesne River have different management concerns. A variety of agreements and prior rights impact certain PRP water rights differently. For example, water stored by PRWUA under certain PRP Provo River water rights is subject to release from storage, on the order of the Utah State Engineer, to satisfy more senior rights in the Utah Lake Basin. Unlike the Bonneville Unit of the Central Utah Project (BU), the PRP is not a flood control project. PRWUA is not obligated to operate Deer Creek Reservoir for flood control purposes. (Letter 218)

UNF/WCNF – The LEIS should explain how any Wild and Scenic Rivers Designation (Designation) will affect the operation and maintenance of Provo River Project (PRP) facilities within the Wasatch-Cache NF, and whether diversions and conveyance of PRP waters will be impacted. The LEIS should recognize the withdrawals by the Dept. of the Interior on Wasatch NF lands and the utilization of lands in connection with the PRP and the Provo River Channel Revision of the PRP, pursuant to Section 3 of the Reclamation Act of June 17, 1902 and other Reclamation statutes.

...certain described lands within the Wasatch NF under a First Form Reclamation Withdrawal for the PRP extend from the vicinity of the Duchesne Tunnel Diversion, along the Duchesne Tunnel alignment and adjoining lands to the Provo River. Such adjoining lands also included substantially all of the gravel access road constructed by the U.S. that extends from the Mirror Lake Highway to the Duchesne Diversion.

...PRWUA would be happy to provide the WSR Team with descriptions of the withdrawn lands.

...In addition to the authority to withdraw previously reserved federal lands, Reclamation may manage these lands to the extent the reclamation project requires. (Withdrawal Under Act of June 17, 1902)

...PRWUA is advised that the 1940 and 1963 Withdrawal Orders have never been revoked or modified and are still in full force and effect. It is clear that Reclamation had the authority to withdraw reserved National Forest lands and manage those lands to the extent necessary for the PRP. The USFS has no authority or jurisdiction to alter the status of the use of those lands withdrawn for PRP purposes. The use of those lands withdrawn for PRP purposes takes precedence over any other use for other purposes. Reclamation transferred the care, operation, and maintenance of the Duchesne Tunnel and related facilities (1953) and the Provo River Channel Revision and appurtenant and incidental works (1954) to PRWUA. (Letter 218)

WCNF – Our office is responsible for implementation of the Central Utah Project Completion Act (CUPCA). The Central Utah Project (CUP) is a participating project of the Colorado River Storage Project, a multi-state water resources development authorized by Congress for the Upper Colorado River Basin. CUP Mitigation – Red Butte Creek, an eligible segment, is upstream of Red Butte Reservoir, Salt Lake County. The reservoir has been transferred from the U.S. Army to the Central Utah Water Conservancy

District (CUWCD), which completed a reconstruction of the dam for safety purposes. This reservoir is now operated by CUWCD for flood control and fish and wildlife purposes. The Reservoir is refuge for the endangered June sucker fish. Our office is partner in the June Sucker Recovery Implementation Program, along with the CUWCD and others. Red Butte Creek upstream of the reservoir is of interest to the Utah Division of Wildlife Resources for conservation of the Bonneville cutthroat trout, s sensitive species. Success in recovering these fish species will support the goals of the Endangered Species Act and will avoid burdensome restrictions on water resources developments such as CUP. (Letter 208)

WCNF – Red Butte Creek – Future flood control may inundate segment to USGS stream gauging station, or lower portion could be dewatered if the stream needs to be bypassed around the reservoir basin for operation and maintenance. (Letter 142)

WCNF – Do not designate Thompson Creek because it is derived completely from run-off and is not a year round stream. It is used to fill Hoops Lake in the fall, winter, and spring. Wild designation will adversely effect the use of Hoops Lake. There are no fish in this creek and therefore no fishing recreational use. Wild designation precludes continued irrigation and storage use. (Letter 54)

WCNF – Middle Fork Beaver Creek and West Fork of Beaver Creek have several diversion points for irrigation in the segment between the Forest Boundary and the confluence with East Beaver Creek. Private land owners object to designation. The designation could adversely effect existing and potential water resource development, and other development: mineral and energy resource, grazing, and recreation, timber harvest and Forest Management projects, recreation facilities or trail projects. Designating stream segments will negatively impact the social-economic environment of Uinta (Wyoming) and surrounding communities. (Letter 54)

WCNF – Do not designate streams on the Middle Fork of Beaver Creek and the East Fork of Beaver Creek as it would restrict my access to the creeks to maintain my diversion dams, head gates and measuring flumes. (Letter 160)

WCNF – I am against the Beaver/Shingle Creek drainage system coming into Kamas being designated. We would like to have the possibility of maintaining and improving our water system, whether it is by dam, new water resources, cleaning or piping some of the flow. There is a lot of sewage from Samak and pumping that is unlawful which effects the streams value and beauty. We have cattle grazing along Beaver Creek and wish to have this continue. We may need to repair, improve, and update facilities and equipment with regards to Big Creek. (Letter 82)

WCNF – Left Hand Fork Blacksmiths Fork: Source to Mouth – The Left Hand Fork Road (FR-245 west of Herd Hollow, FR-231 east of Herd Hollow) is within 1/4 mile of this eligible segment from the Blacksmith Fork Road (SR-101, mouth end of segment) to Danish Dugway. The Left Hand Fork area along FR-245 is very popular for dispersed camping. There is also a developed campground along FR-245.

FR-231 is a rugged 4WD road, with some attractions along the way (Grey Cliff Spring, Lucky Star Mine), as well as connection to Dip Hollow, Elk Valley, Curtis Creek, and other areas.

To best manage the resources, while providing popular public use, there may be unforeseen future needs to modify the channel or banks of this segment to prevent damage to the road and loss of dispersed camping opportunities or road access. Left Hand Fork is a narrow valley, so there are very limited options for moving the roads or dispersed camping further from the segment in this area.

Recommendation: Because of the public uses, need for dispersed camping areas, and important access roads that are very near this segment, it should not be recommended for Wild & Scenic River designation unless exceptions can be added to allow future channel and bank modifications (dams would still not be permitted). There also may be needs for future trail bridges for non-motorized trails, and possibly a motorized trail, and any recommendation should account for this need. (Letter 156)

WCNF – Provo River – Does not meet criteria due to dry damming that takes place on upper end of segment. Designation would impede contracts and water right obligations. (Letter 142)

WCNF – Logan River: Confluence with Beaver Creek to Bridge at Guinavah-Malibu Campground – Unallocated water runs out of the Logan River during the spring run-off period. It is critical that any future water development of water storage project downstream from this segment is not harmed by designation. (Letter 221)

MULTIPLE – In February 2006, Bureau of Reclamation (Reclamation) completed and EIS and ROD for Operation of Flaming Gorge Dam. The Green River is proposed as eligible under the “scenic” category. While the existence of the Dam on the Green River doesn’t preclude the designation of the Green River or its tributaries as “scenic,” the Wild and Scenic EIS, ROD, and any associated recommendation to Congress should recognize that such designation does not grant a water right of any kind nor does it alter any current or future construction, operation, or maintenance of Flaming Gorge Dam.

The designation of other rivers such as Ashley Creek, Upper Whiterocks River, and East Fork Whiterocks River that are associated with existing Reclamation facilities, raise concerns regarding the restriction that a Wild and Scenic designation may place on Federal water development activities in the Region. In the Manti-La Sal NF, the designation of the Fish Creek and Gooseberry Creek could be of concern with respect to operation of the Scofield project and the proposed Narrows project.

River segments within Utah potentially related to Reclamation projects within Utah:

- *Provo River, Central Utah Project (Bonneville Unit):* UNF – North Fork Provo River, Provo Deer Creek; WCNF – Provo River
- *Provo River, Weber Basin Projects and Weber River Projects:* WCNF – Beaver Creek, Weber River, Middle Fork Weber River
- *Lyman Project:* WCNF – Blacks Fork, Little East Fork Blacks Fork, East Fork Blacks Fork, East Fork Smiths Fork
- *Central Utah Project (Vernal and Jensen Units):* ANF – Lower Dry Fork Creek, Ashley Gorge Creek, Black Canyon, South Fork Ashley Creek, Ashley Gorge Creek.
- *Colorado River Storage Project (Flaming Gorge):* ANF – Green River.
- *Moon Lake Project:* ANF – East Basin Creek, Ottoson Creek, Upper Lake Fork River, Oweep Creek.
- *Central Utah Project (Bonneville Unit):* ANF – Upper Yellowstone Creek, Garfield Creek.
- *Emery Project:* MLSNF – Left Fork of Huntington Creek, Huntington Creek.
- *Scofield Project:* MLSNF – Fish Creek, Gooseberry Creek. (Letter 224)

SF 103 – (3) Existing and potential transportation, facilities, and other developments.

Other potential projects like transportation, facilities etc, which could irreparable harm the values of the river should also increase priority for bring found suitable. (Letter 118, 209)

UDOT is supportive of preserving natural values of rivers and streams. A request that protected areas have sufficient offsets to allow for expansion of the State of Utah roads and bridges. Generally corridors should be in approx. 500 feet in width to allow for the possibility of necessary cuts and fills. Areas of steep canyons may have wider right-of-ways needs. (Letter 25)

With regard to river segments that would be classified as “wild,” Red Rock Forests encourages the agency to ensure that the management planning associated with ‘wild’ segments includes the prohibition of development of motorized trails, roads and/or routes. This is crucial to the maintenance of the ‘wild’ designation and protection of the values for which a river segment would be so designated. River segments that would be classified as ‘scenic’ should encourage non-motorized access over motorized access in order to protect the scenic quality of the area. (Letter 70)

We're finding a significant number of illegally constructed and maintained unauthorized routes. With the limited law enforcement this issue will only expand and has the potential to impact the districts outstanding river values. Currently, there is no better method, than the Wild and Scenic Rivers Act, to protect these rivers from these and other future impacts other. (Letter 112)

Duchesne County requests that any eligible river segments outside of designated wilderness areas be deemed unsuitable because of potential future needs for the listed facilities, including utility corridors necessary to transmit energy sources to a growing population. (Letter 124)

Streams on the North Slope of the Uinta Mountains – A concern with designations on the wilderness is that the regulations that will be federally mandated could be enforced by federal land managers and stop travel through the half mile corridors. This could easily happen just by a different interpretation of the law. (Letter 161)

FNF – Millard County is opposed to designation of Corn Creek. Access – Recreation through this segment already exists. The road is present through at least $\frac{3}{4}$ of the segment proposed. (Letter 217)

MLSNF – Highway 31 parallels Huntington Creek throughout the canyon. Small privately owned dirt roads diverge at some private property. If coal development expands, new highway access points may be needed. This means additional new creek crossings, bridges, diversions, and river corridor improvements. Much of the economy in Sanpete County is tied to the workers who are employed at the coal mines and power plants. Highway 31 is the access that permits them to live on one side of the mountain and work on the other. If industries increase, widening of Highway 31 may be necessary. (Letter 163)

MLSNF – I am opposed to designation of any areas in San Juan County, Utah. It is such a long stretch to designate Arch Canyon or Hammond Canyon or any other canyon /wash in this county that I believe those pushing for such a designation mainly want to further curtail my access to and ability to enjoy these beautiful canyons. (Letter 246)

MLSNF – Upper Dark Canyon – We have a fear that another designation could eventually result in the closure of the route into the canyon by way of Peavine Canyon. This route was insisted upon by Congress when they made the wilderness designation on Upper Dark Canyon. We often use and enjoy this route and do not want to see it closed.

...Comments regarding planted trout in Poison Canyon. Our group has spent many hours in these areas and have never seen a trout, or for that matter any other minnow or fish.

...Your comment that existing roads were leading to erosion of soils. The USFS has the responsibility to maintain roads and should do so, this reduce that erosion. You claim money is short but you never ask our group for help on roads although we have made the offer many times. (Letter 265)

UNF – Fifth Water Creek – Proposed Sixth Water Transmission line may impact scenic status of creek. (Letter 142)

UNF/WCNF – PRWUA does attempt to coordinate and cooperate with a number of private, local, state, and federal entities in monitoring snow pack, and predicting and planning for spring runoff, consistent with PRP rights and objectives.

...PRWUA requests the LEIS and any designation acknowledge PRWUA's continued year-round motorized use of the gravel access road which extends from the Mirror Lake Highway to the Duchesne Diversion, for the purposes of care, operation, and maintenance of Provo River Project (PRP) facilities and equipment, including Duchesne Tunnel, Duchesne Diversion, and associated equipment and facilities including two repeater stations and other SCADA equipment.

...A small number of snotel sites provide limited information. In addition to snotel data, it is critical that PRWUA personnel have winter access, on very short notice, to a variety of locations within the Wasatch-

Cache NF by helicopter, snowmobile and snow cat, including locations on river segments that might be designated as “wild,” “scenic,” or recreational” based on the suitability study, in order to monitor snow pack conditions for the purposes of coordinating and planning for the spring runoff. This is important to water users as well as federal, state, local, and private entities PRWUA voluntarily coordinates and cooperates with.

PRWUA requests the LEIS and any designation acknowledge PRWUA’s continued winter helicopter, snowmobile, and snow cat access to W-C NF lands for the purpose of monitoring snow pack conditions. (Letter 218)

WCNF – Do not designate West Fork of Blacks Fork (from source to trail head) – There is an “early warning site” which must have protection for access. A designation causes access problems for current and future uses. The Corridor of Scenic designation disallows access due to the listed restrictions within the documents. (Letter 54)

WCNF – Do not designate Henry's Fork - designation has potential to eliminate existing and future access to Kings Peak, Henry’s Fork Basin, and the High Uintas Wilderness usage. It is too risky to assume future managers will favor continued access to the High Uintas Wilderness areas. It is apparent this Wild and Scenic designation process is another attempt to move the Wilderness Boundary north to the North Slope Road. (Letter 54)

WCNF – How a designation status effects building within the town is a concern. Could a business or a individual install a micro-hydro pelton power wheel for small scale electrical usage for example, one site that comes to mind would possibly be at the outflow at the base of the Landis Ski Jump hill, it is in the Alta Ski Area Permit that a set cubic feet per second flow through this site. My memory recalls something like 1.68 cfs. I may be wrong. But it is a set rate and could be a possible site for these small-scale pelton power wheels. Just an example, would this be allowable. (Letter 73)

WCNF – Here's some of what I think you'll hear in the formal comments about Little Cottonwood Creek:

- Snowbird and Alta ski areas will have concerns about how designation could affect their existing operations - esp. at the base areas - as well as how the designation could affect future projects; and If these concerns could be addressed, I think there could be fairly widespread support for designation. (Letter 73)

WCNF – The Town of Alta, the USFS, UDOT, Salt Lake County, Alta Ski Lifts Co., and Snowbird Corporation are contributing significant time and resources toward mitigating the avalanche hazard on Highway 210. This is a primary critical public safety issue. The LEIS should consider UDOT’s August 2006 Little Cottonwood Canyon Road SR 210 Transportation Study, and in particular, identify whether the possible avalanche mitigation identified in the study would be affected by inclusion of Little Cottonwood Creek into the Wild and Scenic River System. (Letter 111)

WCNF – Little Cottonwood Creek is listed as an impaired waterway because concentrations of zinc found in the creek are toxic to trout and the creek is designated as a coldwater fishery. The Town of Alta along with numerous stakeholders, is considering the possibility of mitigating this impairment by constructing a permanent wetland to filter zinc from contaminated water draining from the Columbus Rexall Mine before that water reaches the creek. This would enhance water quality and ecological value. The LEIS should address the affect the inclusion of the Little Cottonwood Creek into the Wild and Scenic River System will have on permitting and liabilities associated with the construction and long-term operations and maintenance of the filtering wetland. (Letter 111)

WCNF – Cottonwood Canyon Creek – State Road 210 is no further than 0.25 miles from Little Cottonwood Creek. SR-210 is the only route between Salt Lake valley, the Town of Alta, Snowbird Ski Resort, Alta Ski Resort, and many private residences. UDOT must be able to perform maintenance and operational activities

to ensure the safety of the public. Current operations include using salts for deicing, grading shoulders, removing snow, maintaining stream banks adjacent to SR-210, removing rockfall and avalanche work which sometimes reaches Little Cottonwood Creek, all impacting the creek.

UDOT operates under a Special Use Permit issued by the WCNF. It allows personnel the use of certain facilities, explosives, and helicopters for avalanche control work. SR-210 is the most hazardous roadway in North America, due to high volume of traffic and large number of avalanche paths that cross it. Continued ability to perform avalanche control activities are of utmost importance to UDOT.

Planned improvements to SR-210 include: new methods of avalanche control, realignment of SR-210, fences or nets, snowsheds, widening turnarounds, safety features, bike lanes, passing lanes, additional parking etc. UDOT recommends this creek not be designated. (Letter 158)

WCNF – Many of the rivers listed below have great personal value to me in their unaltered natural conditions. The Logan River remains under constant and severe threat due to surrounding pressures. A rising population in Cache valley and the resultant increase in use of Logan Canyon, coupled with the increasingly popular destination of Bear Lake, make widening portions or all of Highway 89 more and more appealing to various interests. Such an action would cause irreparable damage to a variety of uses of the river, including permanent loss and degradation of Bonneville cutthroat trout habitat, severe detriment to the canyon's scenic and recreational values, and both temporary and permanent stress to many other wildlife species that utilize the river corridor. Protection under the Wild and Scenic Rivers Act would provide substantial safeguards against the degradation of the Logan River for the short-term gains of a few. (Letter 119)

SF 104 – (4) Existing and potential mineral and energy resource activities

The Utah Geological Survey (UGS) requests that the USFS investigate the scope of how proposed additions to the National Wild and Scenic River system would impact the exploration and development of oil, gas, and other mineral resources within the National Forest Service lands in Utah. Further, to the extent possible, the UGS requests that the USFS, in making determinations of any new river segments suitability for addition, eliminate, or keep to a minimum, and new river segments that would prohibit exploration and development of Utah's domestic sources of these resources and increase the reliance on foreign sources of energy and minerals. (Letter 74)

Impacts to exploration and development of oil, gas and other mineral resources must be fully analyzed and disclosed. To accomplish this, the mineral potential of the subject areas must be fully reported. Further, the county requests that USFS, in making determinations of any new river segment's suitability for addition, eliminated any new river segments that would prohibit the possibility of exploration and development of these critical resources. (Letter 148, 211)

Red Rock Forests is concerned about the potential impact to water quality, riparian vegetation and crucial wildlife habitat, particularly in areas in Southeast Utah. We oppose the approval of leases for oil, gas, uranium and other industrial development in river segment corridors that will be classified as "wild and scenic" under the Act. Most notably, any industrial development that requires the use of river water and/or waste should not be allowed. (Letter 70)

Do not designate rivers near potential and existing fields in the Frontal Gas and Oil Play of Central Utah, the Paradox Gas and Oil Play of Eastern Utah and Western Colorado, areas near the Green River Formation due to future economic growth of towns, potential resource extraction, and hydroelectric projects. Specifically do not designate Crystal Geyser near Green River, the Fremont Indian State Park in Clear Creek Canyon, the dry area of Beaver River along which the Dominguez-Escalante Trail follows, and Cove Fort on Cove Creek. (Letter 9)

ANF – Duchesne County requests any eligible river segments outside of designated wilderness areas be deemed unsuitable because of the potential for mineral and energy resource development in the future. The

Mineral Potential Report developed in 2002 for Vernal BLM Planning Area shows potential for energy and mineral development along rivers and streams on the Ashley NF. (Letter 124)

ANF – Portions of White Rocks River abutting tar sands development areas should not be deemed suitable. (Letter 19)

DNF – East Fork of Boulder Creek - Garkane uses the East Fork and main stem of Boulder Creek for generating electricity through two separate hydroelectric projects. Although Garkane's facilities are not located in the creek segment under consideration, Garkane is concerned that the USFS, USFWS or other governmental agency might view Garkane's existing facilities as "directly affecting" such designation which could lead to alterations to how Garkane uses the East Fork of Boulder Creek for generating electricity for the benefit of the local community or prohibit Garkane from constructing new facilities in the future, should and such facilities be needed. In particular, Garkane is concerned that its conduct of activities upstream of its project may be necessary or desirable for the operation or improvement of its projects. FSH 1909.12, Chapter 8 indicates the following activities would be prohibited if WSR designation is made: future construction of water resource projects; future construction of low dams, diversion works or other minor structures; and new transmission lines and tree-cutting.

While it is certainly possible that none of the activities would be necessary on the East Fork of Boulder Creek upstream of its projects, Garkane is concerned by the potential for their absolute prohibition posed by WSR designation. (Letter 270)

FNF – We oppose the designation of Fish Creek for the following reasons:

- There are historical as well as current mining concerns as well as existing mineral rights.
- Valid and existing rights especially regarding mineral rights and water ownership may be jeopardized by special designation. (Letter 126)

FNF – We oppose the designation of Salina Creek for the following reasons:

- Salina Creek is near coal reserves and valid and existing lease agreements, so potential mining may be affected by designation.
- There is currently oil and gas exploration from the Dominion Oil Company in the areas.
- Potential oil and gas and delivery lines may be necessary in the area.
- Potential future coal portal (surface facility) for coal mining in the area. (Letter 126)

FNF – Do not designate the following: Fishlake National Forest – Sulpher Creek, Cove Creek, Dog Valley Canyon Creek, Dry Wash Creek, Cottonwood Creek, Clear Creek, Tribune Creek and North South Creek, Wide Mouth, Dry Wash, and Corn Creek. Because of mineral rights and opposition to inclusion of inholdings areas should be open to gas and oil, mineral, and energy exploration and production. Do not include segments: Coyote Springs and Clear Lake, on or near the Beaver River below the Minersville Reservoir, and south of Clear Creek in Beaver and Millard Counties, the east bank of the Green River East of Green River, Utah; and Valley City Reservoir, old Valley City area of the Thompson Wash administered by the BLM. All public and private land on which the inclusion in the National Wild and Scenic Rivers System might impact private mineral rights, owned by Paxton Mineral Corporation, be excluded. (Letter 8, 20)

MLSNF – Currently there are three active coal mines in Huntington Canyon. Several additional mines in the area are now closed. The potential to expand current coal mining operations at existing mines exists. This would necessitate additional river crossings and increased truck traffic, most of the coal removed by truck must cross Huntington Creek. Currently, coal removal is approx. 6 million tons her year, with increases anticipate in two of three mines. (Letter 163)

WCNF – Do not designate Boundary Creek – There is current mineral (oil and gas) activity and some private property. (Letter 54)

SF 105 – (5) Existing grazing activities.

If the purpose of the Wild and Scenic Act is to maintain the riparian vegetative communities within the river systems, then livestock grazing is an incompatible use in those systems, not only because of a loss of predators, but also because of the trampling, soil erosion, weed infestation and loss of plant diversity prevalent with livestock. (Letter 70)

Access to stream segments for direct livestock watering or diversions for such are critical to the ability of livestock operators to utilize their grazing privileges. Equally important is the ability to develop water or make other improvement to maintain or improve range condition. No designations should be proposed that in any way curtails such activity. Impacts to such activity must be analyzed and disclosed. (Letter 148, 211)

ANF – Duchesne County believes enforcement of grazing permit stipulations in place prior to eligibility status will ensure rivers on the Ashley NF are protected from any adverse impacts that could occur from livestock grazing. Wild and Scenic River designation is not necessary to protect the resource (Letter 124)

DNF – Moody Wash – There are grazing and mining interests in the area that, while they appear unlikely to affect the segment itself, may be negatively impacted by its designation under the WSRA. (Letter 154)

FNF – Millard County is opposed to designation of Corn Creek because it would adversely affect grazing and inhibit permittees. (Letter 217)

MLSNF – Private lands within the Fish Creek segment are used primarily for sheep grazing. Adjacent Forest Service lands are also used for grazing allotments. Wild and scenic designation could further limit access to those grazing allotments. SWCD is opposed to further reductions in grazing allotments. (Letter 125)

MLSNF –

- San Juan County does not support Chippean and Allen Canyons as suitable for inclusion as a Wild and Scenic River. The historical grazing use in these canyons is important to the local economy. This is very important to the grazing permittees on the forest as well as the White Mesa Ute Indians who graze lower Allen Canyon. San Juan County is one of the poorest counties in the United States. Any management that would reduce or eliminate the grazing in this area would compound an already serious economic situation.
- San Juan County does not support Hammond Canyon as suitable for inclusion as a Wild and Scenic River. The historical grazing use in these canyons is important to the local economy. This is very important to the grazing permittees on the forest as well as the White Mesa Ute Indians who graze Hammond Canyon. San Juan County is one of the poorest counties in the United States. Any management that would reduce or eliminate the grazing in this area would compound an already serious economic situation. San Juan County would not support any designation which would eliminate or restrict further grazing in Hammond Canyon. The White Mesa Ute Indians, in all probability, would also be opposed to any additional grazing restrictions.
- San Juan County does not support Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons as suitable for inclusion as a Wild and Scenic River. The historical grazing use in these canyons is important to the local economy. This is very important to the grazing permittees on the forest. San Juan County is one of the poorest counties in the United States. Any management that would reduce or eliminate the grazing in this area would compound an already serious economic situation. San Juan County would not support any designation which would eliminate or restrict further grazing in Upper Dark Canyon.
- San Juan County does not support Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River. San Juan County is one of the poorest counties in the United States. Any management that would reduce or eliminate the grazing in this area would compound an already serious economic situation. San Juan

County would not support any designation which would eliminate or restrict further grazing in Mill Creek. (Letter 252)

WCNF – Do not designate East Fork of Smith’s Fork – This area has been successfully grazed by livestock for over 100 years. Further designation on the stream segments has the potential to harm historic uses of this area of the National Forest/Wilderness. (Letter 54)

WCNF – Do not designate Still Water Fork there is historic grazing on this segment. Listed restrictions indicate there are no further opportunities to increase numbers of permitted livestock or improve grazing conditions due to management. Many of the historic grazing areas have been removed from the permitted areas and listed restrictions disallow reinstating grazing in those areas even if conditions have improved sufficiently to warrant grazing as a vegetative management tool. Any designation on streams prohibits grazing as a vegetative management tool if it isn’t a current practice. (Letter 54)

...The Coalition advocates continued multiple use as prescribed by law and objects to further restrictions which put continued use and access of the National Forest in jeopardy. (Letter 54)

WCNF – We oppose placing any of these designations on the Blacks Fork River and West Fork of Blacks Fork. We need access along each of these rivers. In the revised Forest Plan, we have been allowed to continue to access West Fork Allotment on the existing road to the second crossing or where the current wilderness boundary is located. In addition there is an early warning site for Meeks Cabin Dam at this location that requires access. The road which access this area follows right along the river and any designation placed on this river would preclude further use of this road, for maintenance of our facilities, moving our sheep camps into this area, including salt for our sheep and supplies for sheep herders and maintenance supplies. (Letter 129)

WCNF – We graze livestock on the Middle Fork of Beaver Creek and the East Fork of Beaver Creek. Designations would place a number of restrictions on future use of this area. (Letter 160)

SF 106 – (6) Existing and potential recreational activities.

The demand for recreational opportunities in the area is expanding with the increase in population, greater amount of leisure time and increased discretionary spending. Recreation is an important economic resource to Daggett and Uintah County and contributes greatly to quality of life in the area. No designations should be proposed that curtails such activity. Impacts to such activity must be analyzed and disclosed. (Letter 148, 211)

Duchesne County will not support designation if it would reduce the range of recreation activities currently enjoyed by the public on river segments. Also opposed to measures that would reduce access to rivers by members of the public who are not capable of lengthy, strenuous hikes. (Letter 124)

ANF – Designate the Green River because I enjoy white-water rafting on it. (Letter 95)

ANF – Green River - Recreation - In addition to Red Canyon’s world class fishing noted above, this section of river also provides excellent canoeing, rafting, sightseeing, biking, and several hiking trails located along the lower stretches of Red Canyon. This stretch of river was formally more popular as a rafting destination, but has now shifted towards a world-class fishing destination. This section of the Green River receives 97,000 visitors every year. One river runner guidebook to Utah states that this segment of the Green River as one of the most popular short float trips in the entire state of Utah. (Letter 209, 202)

ANF – *Recreational value* – The recreational opportunities along this river are broad and include everything someone that loves high mountains could desire. Some of the popular activities include hiking, backpacking,

hunting, horseback riding, and fishing. The Upper Whiterocks River is part of the Chepeta Lake recreation complex and receives a lot of visitors for these mountain activities. (Letter 209)

ANF – Uinta River – *Recreation* - The river and its tributaries are well used and well loved for its hiking, camping, and fishing opportunities, and the main Uinta offers boating opportunities. (Letter 209)

ANF – Yellowstone River – *Recreational* - The River is well loved for its hiking, fishing, equestrian, and camping opportunities, and the Yellowstone offers kayaking possibilities. Hiking in the Yellowstone Basin is phenomenal and popular. Equestrians – both locals and tourists traveling with outfitters – use the area heavily. Fishing is excellent in the Basin. Camping in the upper Yellowstone basin is a wilderness experience in an exceptionally scenic canyon with access to fishing in numerous pretty little lakes. Below the confluence with Swift Creek, the Yellowstone River is runnable by kayak in late May and early June. The section above the reservoir is a Class II+ stream, making it suitable for a broad range of skill levels. (Letter 209)

DNF – The Old Spanish Trail occurred from Mountain Meadows down Moody Wash to the main Santa Clara River. Although there are OHV routes along Moody Wash, these should not preclude suitability, but rather augur toward a recreational classification. (Letter 162)

DNF – Mamie Creek and Death Hollow, Escalante Ranger District – These canyons are some of the most spectacular canyons within reach of a 3-day backpacking trip in Utah. Most of the length of these canyons lie within BLM lands but some lies within the Forest Service lands. Both the BLM and Forest Service portions should be preserved as Wild under the Wild & Scenic Act. (Letter 87)

DNF – Designate segments on the Dixie National Forest to protect ecological and recreational values. Protect the area around the Pine Creek watershed from vehicle and other detrimental damage. A Wild classification for Pine Creek, Death Hollow, and Mamie Creek makes sense. (Letter 11)

DNF – North Fork Virgin - *Recreational* - Truly exceptional recreational opportunities include hiking, kayaking, photography, camping, and sightseeing. The North Fork of the Virgin River can be run by a kayak during high water and is described as a class 3 to 5. Downstream of the segment, The Zion Narrows hike is really simply a long walk and wade along the North Fork of the Virgin River. One hiking guide states that this is the best known hike in Utah. (Letter 209)

DNF – North Fork Virgin River – We've hiked the Zions Narrows several times and kayaked the North Fork of the Virgin River from the Temple of Sinawava down to the Park Entrance a spectacular kayak run. The kayak run is an easy float from the Temple to the Court of the Patriarchs. The section below the Court of the Patriarchs has excellent Class III & IV rapids. Hopefully the entire North Fork can be preserved under the Wild & Scenic act. (Letter 88)

DNF – The North Fork of the Virgin River as it passes through Zion National Park has created one of the premiere scenic and recreational destinations in the entire country at the Zion narrows. The narrows are world renowned for the majestic beauty and awe-inspiring experience. In the Narrows the river is only 18-foot wide at sections with the cliffs towering up to 2,000 feet overhead. This segment of the North Fork of the Virgin River is far upstream of the world-renowned narrows, but is near the headwaters. However, this section of the river is home to the most popular trail on the DNF, which terminates at Cascade Falls. (Letter 118, 209)

DNF – North Fork Virgin River - We urge Wild River status. The North Fork is the headwaters of the river that flows down through Zion National Park, where more than 2 million visitors enjoy the magnificent canyon created by the North Fork. As often happens, the national park boundaries did not include all the significant features and in this case the headwaters were left out of the park, although they have many of the

values of lands within the park. The continuity of the North Fork from Springdale up to the source should be protected by Wild River status. Recreational hiking and canyoneering in these canyons will increase over the coming years, especially with the fast-growing populations of Las Vegas, southern California, and southern Utah at close hand. This river will be much in demand as a wild place. (Letter 99)

FNF – Millard County is opposed to designation of Corn Creek because it is not a native Blue Ribbon fishery. (Letter 217)

MLSNF – Private and USFS lands in the Fish Creek/Gooseberry Creek area are used heavily for recreation. There are numerous private cabins in the area. The area is also used for snowmobiling, camping, hiking, and fishing. SWCD opposes measures that limit the recreational use of the area. (Letter 125)

MLSNF – Fish and Gooseberry Creeks – Fish and Gooseberry Creeks are my favorite river destinations in all of Utah. Both creeks easily qualify as suitable for Wild and Scenic protection. The Creeks are a wonderful recreational destination, and are heavily used by locals and non-residents alike. The Fish Creek National Recreational Trail – a special designation which underlines the quality of this recreational resource – provides easy access for hikers, hunters, anglers, and equestrians. In addition, although they provide a quality backcountry experience, both are easily accessible by road – allowing many types of recreation-seekers to enjoy the Creeks. The Creeks also offer a year around recreation season. Spring turns out birders and wildflower enthusiasts. Hiking is possible from snowmelt through the late fall. Fishing is popular from July forward. The fall hunting season is very popular, and in winter snowmobiling is widespread. In addition, cross-country skiing occurs in the lower part of Fish. (Letter 210)

MLSNF – *Recreational* – There are a number of individuals, groups, and families who utilize Fish and Gooseberry Creek corridors for outdoor enjoyment. Activities range from fishing, hunting, hiking, and camping to the use of creek water for municipal supplies in Carbon County. The hunting in the area is fantastic and very popular, especially due to the abundance of deer and elk. The trail is so popular among outdoor enthusiasts that it has been named a National Recreation Trail. The Creeks also have excellent fishing. Upper Fish Creek is described as a pleasant stream to fish, especially if you favor beaver dams. Upper Fish Creek holds mostly 12-20 inch wild cutthroats, and a few rainbows, while Gooseberry Creek has wild cutthroats that average 9-12 inches. (Letter 209)

MLSNF – *Fish & Recreation* Huntington River has been listed as a Blue Ribbon Fishery by the State of Utah. This stream section is the only fishery in Utah with fly-fishing only regulations. Huntington Canyon provides a beautiful setting for this unique fishing opportunity with high quality habitat and abundant forage. Along the Lower Left Fork of Huntington Creek are opportunities to fish areas that see very little pressure are available to anglers willing to hike.

MLSNF – A well-developed system of trails access federal and private property in most side canyons draining into Huntington Canyon. After PacifiCorp built Electric Lake and significantly altered flows in the main channel, upper Huntington Creek developed into a blue-ribbon trout stream. PacifiCorp is committed to stewardship of the fisheries we helped to build and maintain. The canyon is a camping and hiking destination. Highway 31 is a Scenic Byway-Energy Loop. Coal extraction and generation of electricity have been co-habitants of this beautiful scenery. (Letter 163)

MLSNF – Huntington Creek is the premiere destination in the entire area. The river is incredibly popular for all types of recreational activities, including fishing, boating, hiking, and more. The creek cuts through a narrow canyon that exhibits rich diversity in vegetation in geology. The phenomenal scenery in the area has led to the creation of a National Scenic Byway. Additionally, the superb fishing in Huntington Creek has led to designation as a Blue Ribbon Fishery by the State of Utah. No other river in this area of the state equals

the beauty and high quality recreational experiences that can be experienced on Huntington Creek. (Letter 118, 209)

MLSNF – Abajo Mountains section: Hammond Canyon is the next drainage to the north and east of Arch Canyon. It will become ever more important as a wild river for visitors to Blanding in the coming decades. We favor Scenic River status for Hammond. (Letter 99)

MLSNF – I guide groups into the Manti-La Sal National Forest for the Animas Valley Institute on a regular basis. I have enjoyed all of the four rivers that are being considered: Hammond Canyon, Chippean and Allen Canyons, Upper Dark Canyon and Dark Canyon. I have seen the damage that has been done at times, especially in Hammond Canyon by illegal driving of ATVs along that river. I very much support the protecting of these rivers by designating them as part of the National Wild and Scenic River System. (Letter 237)

MLSNF – Chippean Rocks and Allen Canyon – We are interested in the recreational values of these two canyons but feel the USFS now has the tools to manage recreation. We understand the USFS can not expect additional money as a result of wild and scenic river designations, so what do you hope to gain? Our fear is that this is just another tool to eliminate our use from those areas. (Letter 265)

UNF – Fifth Water Creek is popular for recreation, largely because of natural warm water springs that flow into the stream. It is a popular place for nude swimmers. We question the wisdom of listing this stream given that it continues to be used in a manner inconsistent with requirements of designation in the National Wild and Scenic Rivers system. (Letter 150, 152)

UNF – Fifth Water Creek – I recommend a suitability finding for Fifth Water Creek. I regularly hike, fish and enjoy the area's hot springs. The Creek attracts many visitors, and is truly unique in the accessibility of and quality of its hot springs. Year around, visitors flock to the springs – even if they have to snow shoe in. In addition, the fishing is high quality and popular. (Letter 210)

UNF – Little Provo Deer Creek is a beautiful little creek that has great recreational values, especially at Cascade Springs. It is highly used and has incredible interpretive opportunities. Over the past several years the interpretive facilities at Cascade Springs have been improved upon with the construction of decking and interpretive signs. There are lots of classes that come to Little Provo Deer Creek for the educational and interpretive opportunities. This is a beautiful river located close to the urban Wasatch Front and provides valuable and unique interpretive opportunities. (Letter 118, 209)

UNF – *Recreational* - the Provo River is a backyard river for Utahans that live along the Wasatch Front and for visitors. This river provides a unique recreational experience for visitors who are able to access it easily in an afternoon after work. The Provo River is a sanctuary and provides an area where urban dwellers can go to seek spiritual peace of mind. This becomes more and more important as the Salt Lake valley continues to grow. The list of recreational opportunities along the Provo River is long, including kayaking, tubing, hiking, camping, fishing, and sightseeing among others. The main stem of the Provo River from the headwaters to just below where the North Fork enters can be run by kayak and is ranked as a Class 2. Mirror Lake highway is the main thoroughfare for residents of the Wasatch Front to visit the Uinta Mountains. The Provo parallels this road for several miles and the Forest has created a very popular interpretive site along the river at the Upper Provo River Falls. The North Fork of the Provo River comes off the slopes of Mt. Timpanogos. While the river itself is not the primary destination, the trail to the top follows along the river and Mt. Timpanogos is described as the most popular mountain climbing destination in Utah. (Letter 209)

WCNF – Sections of the Little Cottonwood Creek are worthy of protection. The Creek is a beautiful, dangerous, and exciting watercourse. Many people visit it. There are great hiking and biking trails, and these also offer access to creekside recreation such as picnicking and bouldering. I know this creek is

already somewhat protected, but I also know it flows into a SuperFund area, due to old mine tailings. I would like to see this segment cleaned up (e.g. mine tailings removed or treated) and protected for future recreational enjoyment. Around the creek I have seen mountain goats, coyotes, and many small mammals and birds. I believe that Little Cottonwood Creek should be protected for its beauty and contribution to recreation values, as well as its use as a water source (which, I believe, the town of Murray takes advantage of). (Letter 75)

WCNF – Do not designate Blacks Fork – Recreational designation will have an adverse effect on transportation, recreational experiences, grazing, or mineral development. Currently, recreational users (including senior citizens, physically challenged folks, and folks who do not own a 4 wheel drive vehicle, or are unable to walk ¼ mile) are allowed to use the stream banks and surrounding areas at will. It would be a shame to alter or eliminate that opportunity from the general public simply because someone thinks it's important to have a certain designation on a USFS map. (Letter 54)

WCNF – Designate the Logan River:

- For recreational opportunities. (Letter 95)
- It would be a shame to let this river devolve into a fully regulated, harnessed mess. For swimming, tubing, fishing and kayaking. It would be special to have access to a piece of undeveloped nature. (Letter 98)
- The Logan River is an outstanding example of the qualities associated with a wild and scenic river designation. Protecting it will help preserve the amazing and diverse Logan Canyon, which provides habitat for wildlife and recreation for people. (Letter 91)
- We frequently kayak the Logan River from Rick Springs down to the Guanavah-Malabu Campground early in the season. This section has excellent scenery, fishing, plenty of wildlife, and one of the best Class III kayak runs in Utah. The entire canyon upstream of the reservoirs at the bottom of the canyon should be preserved as either scenic or recreational. (Letter 84, 85)
- The Logan River system flows from the Bear River Range, entering the Bear River near the university city of Logan. The Logan mainstem and its tributaries have long been a source of recreation and inspiration to residents of northern Utah. The wildlife of Logan Canyon has been intensively studied by faculty and students of USU in the University's research programs and for recreation. We favor WSR status for all qualifying parts of the Logan River system. (Letter 102)

WCNF – Logan River – Recreation - The list of recreational opportunities on the Logan is long and includes: kayaking, tubing, hiking, sightseeing, rock climbing, biking, and fishing. There are lots of interpretive signs and recreational facilities located along the entire length of the Logan River. The quality of the recreational experience is phenomenal. The Logan River provides exceptional kayaking and is enjoyed by locals and visitors alike. It is loaded with rapids ranging from Class 2 to 5. Logan Canyon has several very popular and scenic hiking trails. The trail along Bunchgrass Creek is very remote, with little evidence of human activity other than a single-track foot path and is incredibly beautiful. The Logan River and its tributaries offer great fly – fishing. (Letter 209)

WCNF – I support a positive suitability finding for all outstanding rivers on Utah's National Forests, and especially for the Logan River.

As advisor for the USU Kayak Club and an avid kayaker, I've paddled the Logan River for the past 15 years. The proximity of the river to Logan City makes it easy to fit in a run after work or classes. I will focus on the river above Third Dam, which includes sections of Class II, III, and IV whitewater. The Logan River is ideal for kayaking because of the easy access from the road through the canyon. Yet, despite the proximity to the highway, paddlers rarely notice the road or the traffic. One of the most delightful sections above the Dugway diverges from the road. I've encountered a moose grazing in the river. The scenery is outstanding. It is especially beautiful in May when the riparian vegetation is brilliant green, the yellow warblers are singing and flitting, American dippers zoom close overhead or walk along the rocks, the mountains capped with snow, and dramatic rock formations.

Suitable flows for kayaking typically extend from April through June and sometimes into July (depending on winter snow pack). The river typically peaks around Memorial Day weekend. A moderate flow for the Logan River 400-600 cfs. A popular class III run starts at WoodCamp camp ground and continues to Card Picnic area. Paddlers rarely continue on to Third Dam due to low hanging trees and fewer rapids below Card. A large spring dumps water into the river on river right at the Woodcamp CG. The gnarliest rapid is St. Ann's. Rick's Springs to the Cottonwood Creek/Logan Cave take out has a lot to offer. (Class III)

The river is incredibly beautiful, with many side streams entering the river. There are several small springs that cascade down limestone walls through green mossy beds. Wildlife is abundant; moose, deer, ducks, and plenty of birds. The whitewater is awesome and goes on for miles and miles.

The run has several spin holes, waves, and cartwheel spots to enjoy. The first section below Ricks Springs is narrow with some fun drops and waves, then the river widens and the challenge is avoiding rocks. The Slide is the major feature- a dramatic cascade visible from the road.

Once that excitement is over the river mellow out as it approaches Temple Fork (alternative access). Below Temple Fork there are no big drops but fast rocky flow with numerous eddies and resting places. The river in this section is far below the road with steep walls on the left. It is not unusual to find patches of snow on the banks. The Monolith Section (Cottonwood Creek/Logan Cave to Wood Camp campground) is Class III+ to IV-, the most challenging. (Letter 113)

WCNF – I support a positive suitability finding for the Logan River System. This includes:

- 1) The Logan River from Idaho line to Beaver Creek (Scenic),
- 2) Logan River from Beaver Creek to Third Dam (Recreational)
- 3) Beaver Creek (Recreational),
- 4) Bunchgrass Creek (Scenic),
- 5) White Pine Creek (Wild),
- 6) Spawn Creek (Wild),
- 7) Temple Fork (Scenic),
- 8) Little Bear Creek (Scenic)

I have been kayaking, hiking and skiing along the Logan River and it's tributaries for about 10 years. The watershed is unique for what it provides in the desert like environment of Utah. Starting in the remote mountain streams like white pine creek, these streams culminate in one of the largest rivers in Northern Utah. The absence of dams on the upper Logan river (above third dam) provides incredible recreation opportunities for anglers and paddlers. For kayaking, this portion of the Logan River includes 20 miles of continuous class II-IV whitewater in an incredibly beautiful canyon.

I have paddled the Snake River in Wyoming many times and have spoken to other paddlers on the river who have paddled the Logan River and they often speak of the Logan river as the best paddling they have done all year.

This comes from professional kayakers who live and paddle in Jackson Wyoming area. In fact it is common that kayakers from the Jackson area paddle the Logan River on there way to Salt Lake city.

Every time I paddle, hike or ski in this watershed, I consider myself incredibly lucky to be able to experience the beauty of this watershed that is all within a short drive of the city of Logan.

I urge you to protect this treasure of Northern Utah by taking the appropriate steps to designating the Logan River as wild and scenic before development destroys the character of the river (especially in the upper canyon!)

In a state where water is scarce, I would also strongly urge you to designate as many of the other rivers as possible as wild and scenic. Many currently satisfy the requirements for wild and scenic, and need protection from the repercussions of the population growth in the state in order to preserve their character. (Letter 233)

WCNF – Logan River System - Even the section considered eligible for a “recreational” classification is next to a National Scenic Byway. The byway saw upwards of 4,000 vehicles a day during the summer months of 1998 validating the public’s interest in viewing the river canyon’s richness and scenic beauty. These visitor numbers are expected to increase by 40 percent over the next 20 years further justifying the need for added protections to the resource. (Letter 112)

WCNF – Logan River: Confluence with Beaver Creek to Bridge at Guinavah-Malibu Campground – There are numerous summer homes, several developed campgrounds, trailheads, popular dispersed camping areas, and bridges in this segment. Additional dams along this segment are not needed, but there are places where slight modifications to the channel may be needed for road improvements. In particular, US-89 has very narrow shoulders in the middle portion, and some widening is necessary for safety and to provide adequate room for bicyclists using the road.

Recommendation: Because of the public uses, summer homes, need for dispersed camping areas, and important access roads and bridges that are very near this segment, it should not be recommended for Wild & Scenic River designation unless exceptions can be added to allow future channel and bank modifications (dams would still not be permitted). (Letter 156)

WCNF – Temple Fork: Source to Mouth – The Temple Fork Road (FR-007) runs along the lower portion of this segment, and crosses the stream with a bridge in one place. Along the segment, there are two trailheads / parking areas, each with pit toilet facilities. Dispersed camping is popular in a few places along the segment.

Recommendation: Because of the extensive recreational use and facilities along this segment, it should either be recommended with a Recreation classification, or not recommended for Wild & Scenic River designation. (Letter 156)

WCNF – Spawn Creek: Source to Mouth – There is an ATV trail (Worm Fence, FT-142) that runs near, and crosses (ATV trail bridge), this segment. Near the mouth of this segment, there is a trailheads / parking loop and pit toilet facility. Dispersed camping is also popular adjacent to the parking loop.

Recommendation: Because of the extensive recreational use, OHV trail, and facilities along the lower part of this segment (below the OHV trail bridge), it should either be recommended with a Recreation classification, or only the portion from source to the ATV bridge should be recommended with a Scenic classification, or the segment should not be recommended for Wild & Scenic River designation. (Letter 156)

WCNF – White Pine Creek: Source to Mouth, and Bunchgrass Creek: Source to Mouth – There is a need for an OHV connector between the Tony Grove trailhead / parking loop and Franklin Basin. This connector would need to cross each of these segments. Bridges could be used to minimize or eliminate impact to the resources. Cache County may also be asserting rights-of-way near portions of each segment.

Recommendation: Coordinate recommendation with Cache County. Recommendation, if made, should accommodate potential trail & bridges. (Letter 156)

WCNF – Little Bear Creek: Little Bear Spring to Mouth – This segment is adjacent to the USU Forestry Field Station, various training structures, a trailhead for access to both motorized and non-motorized trails, and one of the most popular and heavily used dispersed camping areas in Logan Canyon.

Recommendation: Because of the extensive recreational use and facilities along this segment (below the ATV trail bridge), it should either be recommended with a Recreation classification, or the segment should not be recommended for Wild & Scenic River designation. (Letter 156)

WCNF – Headwaters of the Bear, including Stillwater Fork and East Fork Bear – I strongly recommend a suitable finding for Stillwater Fork, East Fork of the Bear, and the associated tributaries. I have spent many happy days hiking and backpacking along Stillwater Fork. It is an outstanding recreational resource due to its relative proximity to urban areas, the accessibility of the trailhead and the length of session (the trail is usually open well before many others in the High Uintas). These factors combined with the remote and wild nature of the hiking create a wonderful chance for the public to access a wild river easily – a rarity. Despite the ease of accessing Stillwater Fork, the quality of the backcountry experience is incredible. Camping options are numerous, allowing backpackers to find a quiet place for retreat. Due to the numerous beautiful lakes in the Fork's headwaters, destinations are also numerous, allowing hikers to disperse so that this popular trail feels lightly traveled.

Stillwater Fork is well-known as a recreational destination. One hiking guide describes the hike up Stillwater Fork and Ostler Fork as "...probably the most popular hike into the rugged, north-slope drainages of the High Uintas." The same guide stresses Stillwater's popularity with anglers, describes extensive wildlife viewing options along the hike, and the incredible scenic values of the basin.

The wildlife viewing opportunities of the Forks are also outstanding. For example, on just one-day hike I saw six moose along Stillwater Fork. I have seen scores of species of birds during any one day of hiking. I also love fishing the headwaters of the Bear. *The Flyfisher's Guide to Utah* calls Stillwater Fork the most popular of the headwater streams for fishing, but highlights the East Fork, West Fork, and Stillwater Fork. The Guide describes Stillwater as "some of the best slow water" and suggests the East Fork for those who enjoy faster water. I've fished many miles of Stillwater Fork and the other Forks, and would rank these stretches in my top five favorite fishing destinations due to the mix of great fishing, wonderful hiking, incredible scenery, and wildlife viewing opportunities.

Wild and Scenic protection for all of the identified stretches of the headwaters of the Bear would protect an entire headwater system – something we rarely have the chance to do these days. The headwaters of the Bear are a functioning system, complete with high-quality habitat, functioning wetlands, and natural flow regimes. Please protect the entire headwaters of the Bear (including Hayden Fork, Stillwater Fork, Ostler Fork, East, Left, Righthand Forks of East Fork of Bear River, and Boundary Creek) as Wild and Scenic in order to protect this system for wildlife, anglers, and recreationalists of the future. (Letter 210)

WCNF – Henrys Fork is truly an outstanding example of well-preserved riparian habitat and backcountry recreational experience qualities. I found the fishing on Henrys Fork to be outstanding, and the combination of good fishing, great hiking/camping areas, and the amazing scenic beauty of the basin made the entire experience among the best I've ever had...even outstanding among the many great rivers of the Uintas. Henrys Fork is a wonderful recreational resource. As the main trail approach to the Kings Peak climb, Henrys Fork basin receives approximately 5,000 visitors annually. One hiking guide explains, "Many come for the express purpose of climbing Utah's highest mountain, but many more come just to enjoy the abundant scenic beauty of the area and perhaps do a little fishing..."

Henrys Fork deserves a suitability finding and Wild and Scenic protection. (Letter 210)

WCNF – *Recreation* Henry's Fork is an outstanding fishing river in the State of Utah and offers ample opportunities for fishing along its course. In addition to the anglers who can find many happy days wading among the waters of Henry's Fork, hikers and serious mountaineers enjoy visiting Henry's Fork. As stated earlier this is the shortest route to the highest point in the State of Utah and thousands of eager people try their luck at it. On their way they pass by through the gorgeous valley of the Henry's Fork. (Letter 209)

WCNF – Bear River – Recreation - Popular activities include hiking, camping, fishing, sightseeing, horseback riding, hunting, and kayaking. Several different stretches of these headwaters can be boated and range from a nice easy float to a challenging kayak run, with the class ranging from 1 to 4. The proximity of these headwaters to the Wasatch Front metropolitan area makes this area a popular destination for hiking. These headwaters are also very popular among anglers (Letter 209).

WCNF – We would like to recommend the Bear River and its tributaries (including Hayden's Fork, The Main Fork, the Stillwater, and East Forks) for the Wild and Scenic Rivers designation. Hiking on the East Fork and Stillwater into the High Uinta Wilderness with their 12000' ft. peaks is an amazing experience. (Letter 269)

WCNF – The Trial Lake to UT-35 Bridge segment of the Provo River begins at the source of the Provo River and then flows for nearly 30 miles. This segment of the Provo includes the source of the river, the Provo River falls and a long stretch adjacent to Mirror Lake Highway. Mirror Lake Highway is the main highway to access the Uinta Mountains from the West. On this segment are the Provo River falls – this is a major tourist stop and great interpretive area. Kayakers can also run the falls – it is very challenging and only the most experienced kayakers dare to attempt it. (Letter 118, 209)

SF 107 – (7) Other existing and potential resource activities (e.g., farming activities, current or potential vegetation management projects, recreation facilities or trail projects).

Anything that would alter the existing right I am opposed to. I would like to see the land put to use by humans, wildlife, and livestock. (Letter 137)

State of Utah, Division of Wildlife Resources – Riparian habitats are extremely important for wildlife, and mountain riparian and lowland riparian habitats are therefore designated as key habitats in the Utah Wildlife Action Plan. We are concerned that “Wild and scenic” river designations may prohibit future restoration efforts to enhance riparian habitats. These restoration efforts may include, but are not limited to, using mechanical equipment, disturbing the soil, using pesticides, and creating fish barriers. Improving wildlife habitat will enhance value to the river, which is compatible with the objectives of the Wild and Scenic Rivers Act. We hope future designations will not restrict wildlife habitat improvements. (Letter 74)

Habitats are extremely important for wildlife. Daggett and Uintah County has supported and participated with its partners in the statewide conservation and development program and the area has been very aggressive and successful in accomplishing successful habitat projects. We are concerned that “wild and scenic” river designations may prohibit future restoration efforts to enhance wildlife habitats. These restoration efforts may include, but are not limited to, chemical, fire, mechanical treatments and construction of fish barriers and water developments. Improving wildlife habitat will enhance or and value to the river, which is compatible with the objectives of the Wild and Scenic River Act. Designations must not restrict wildlife habitat improvements and any such impacts should be fully analyzed and disclosed. (Letter 148, 211)

Red Rock Forests does not object to existing resource activities except livestock grazing (see above) with the caveat that sufficient stream buffers – a minimum of 300 feet on each side – should be maintained for farming activities. (Letter 70)

I don't believe any type of classification should be made on any river where possible resources can be obtained without any environmental damage. The USFS is already in place to administer our National Forests in the best possible way to protect the eco-system without designations. (Letter 105)

We have concerns that designation will restrict uses that have historically been important to our local economy, such as grazing activities and timber harvesting. (Letter 151)

Duchesne County will not support designation if it impairs farming activities or vegetation management activities needed to reduce fire danger or enhance habitats. (Letter 124)

FNF – We oppose the designation of Fish Creek because there are agricultural and grazing uses that may be affected by designation and changes in management. (Letter 126)

FNF – We oppose the designation of Salina Creek because of livestock grazing. (Letter 126)

MLSNF – Historically, several side canyons off Huntington Canyon contained sawmills. Recent resurgence in logging has resulted in more logging operations in this area. (Letter 163)

MLSNF – *The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the System.*

San Juan County does not support Hammond Canyon as suitable for inclusion as a Wild and Scenic River. The White Mesa Ute Indians own the land on both sides of this drainage in lower Hammond Canyon. They have historically taken the small amount of water for irrigation of these lands as well as culinary use. The

use of this water and land for these purposes would be curtailed if Hammond Canyon were to be designated as a Wild and Scenic River. Such designation would meet with serious opposition from the White Mesa Ute Indians and San Juan County. There are no federal reserved water rights to support a Wild and Scenic River designation.

Water resources are the lifeblood of San Juan County. Even small flows are extremely important in this semi-arid climate. (Letter 252)

WCNF – The water that flows from the North Slope of these mountains could easily be termed the ‘life blood’ of Uinta County, Wyoming. It supplies our municipal reservoirs, irrigates pastures and hayfields, provides water to our livestock and wildlife and creates a whole host of recreational opportunities. The protection of these resources is an effort that we have and will continue to have an extremely high interest in. We have protected these resources for generations. It is imperative that the USFS understand the significant negative impacts that will be brought about by unneeded regulations and restrictions. It is also imperative that the USFS understand and consider the impacts these unneeded regulations will have on private property owners and their rights, including but not limited to the historical uses of timber and lumber production, livestock grazing, irrigation channels and structures, recreation, etc.

You have listed 15 potential segments for consideration that directly affect Uinta County. While all these segments have unique features that must be taken into consideration, they also have important over-arching concerns that are common to all these segments. What must be considered are the current resources these streams support and sustain. Ranchers have for generations built, re-built and maintained an extensive irrigation system that must be protected. Our private land owners object strongly to this potential designation given the negative effects it will have on water resources and further development. This designation will have negative impacts to transportation, mineral and energy resource efforts, grazing and agricultural activities, timber management and healthy forest projects.

... We strongly oppose any of the listed waterways as being designated as wild and scenic. It is important to respect the historical uses and benefits of these streams and recognize that those efforts and individuals who rely on these streams are the very same who have gone to the furthest lengths to protect them and have been providing that protection for generations. These areas are public lands and any designation that would eliminate or alter the opportunity for the public to access and enjoy these areas should be avoided. (Letter 81)

WCNF – Do not designate Little East Fork, Blacks Fork it restricts current or future timbering operation or management of vegetation manipulation, grazing, potential mineral development (i.e., oil, gas, coal). (Letter 54)

WCNF – Do not designate East Fork Blacks Fork because of adverse effects on recreational experience, grazing, mineral development, and continued historic uses. (Letter 54)

WCNF – Step 3, the suitability step considers the question, “Is it worthy to pursue a Congressional designation?”

The answer should be “No” for Little Cottonwood Creek. Here are several reasons.

- 1) The current management under the Forest Plan already protects Little Cottonwood Creek and is the best way to manage the 10-mile segment that is being considered.
- 2) Designation could interfere with our operation of the Alta Ski Area.
- 3) Any potential vegetation management projects under our Vegetation Management Plan may be hindered or restricted if Little Cottonwood Creek is designated. (Letter 104)

SF 108 – (8) Existing or potential special designations.

WCNF – Little Cottonwood Canyon Road (State Highway 210) is a designated State Scenic Byway. A corridor Management Plan for this Scenic Byway is currently underway. The LEIS should consider whether the inclusion of Little Cottonwood Creek into the Wild and Scenic River System will affect any of the

elements of the Scenic Byway, as well as whether it will affect the inclusion of State Highway 210 into the National Scenic Byways System. (Letter 111)

SF 109 – (9) Socio-economic environment.

Local economic impacts resulting from designations should be thoroughly analyzed prior to suitability determinations. (Letter 109, 110)

No rivers in Utah have yet been added to the Wild and Scenic Rivers System. In other states more than 165 rivers have been placed in the system. The absence of any Utah rivers is a glaring gap that should be remedied as a result of the Forest Service study.

Many Utah communities derive major economic benefits from wild rivers. Our members are among the many vacationers who come to Utah for the wild rivers and their wildlife. There is a substantial industry of river outfitters in Utah that take visitors on float trips on these rivers, where they see bighorn sheep, Peregrine falcon, and many other interesting species.

The Wild and Scenic Rivers Act can provide protection for rivers against further deterioration by granting statutory protection. The Act bars the construction of dams on units of the Wild and Scenic Rivers System, and it directs federal agencies to manage each river corridor with primary emphasis on protecting its aesthetic, scenic, historic, archaeological and scientific features. The Act provides three categories, applicable to rivers with varying degrees of wildness: Wild, Scenic, and Recreational rivers. We believe many rivers in Utah are eligible under these categories.

We urge the Forest Service to recommend all the outstanding rivers on national forests in Utah as suitable for Wild and Scenic River protection. We endorse Utah Rivers Council's detailed list of rivers that are well qualified under the terms of the WSR Act. (Letter 102)

I broadly support the concept of protecting our most outstanding rivers under the Wild and Scenic Rivers Act – both as a way to preserve the things that make us all love living in Utah and as a mechanism for future tourism development. (Letter 201)

WSR designation has been shown to provide economic benefits to local communities as shown in two studies (Letters 118, 209).

I strongly support finding all of the identified rivers suitable for Wild and Scenic River status because they all possess qualities that make them excellent candidates for inclusion in the National Wild and Scenic River System. Protecting these rivers will protect the things that make Utah the incredible place it is, preserving the state's quality of life and supporting local communities whose economies rely in part on the recreation and tourism generated by the rivers. (Letter 225, 229)

I support a positive suitability finding for all outstanding rivers on Utah's National Forests, and especially for the following rivers: Green River (Scenic); Upper Uinta River, including: Uinta River (Wild) and Shale Creek (Wild); Upper Yellowstone River, including: Upper Yellowstone (Wild) and Garfield Creek (Wild); North Fork of the Virgin River (Wild); Fish and Gooseberry Creek (Scenic & Recreational)

I strongly support finding all of these rivers suitable for Wild and Scenic River status because they all possess qualities that make them excellent candidates for inclusion in the National Wild and Scenic River System; they would all contribute to the broad array of rivers that are protected in the system throughout the country. Protecting these waterways will protect the things that make Utah the incredible place it is, preserving the state's quality of life and supporting local communities whose economies rely in part on the recreation and tourism generated by the rivers. (Letter 231)

The economic impact resulting from any proposed designation must be fully analyzed and disclosed, Daggett and Uintah County's economy and thus future is dependent upon continued access to, and availability of,

forest service lands, watersheds, minerals, forests products, recreation opportunities, grazing and wildlife resources. (Letter 148, 211)

Rural areas such as Duchesne County rely heavily on natural resource-based industries for the livelihood of its citizens. Residents have a cultural heritage based on access to and multiple-use of public lands. Duchesne County is concerned special designations will interfere with cultural heritage described above. (Letter 124)

ANF – UWCD and OPIC has seen no evidence that any attempt has been made by the Ashley National Forest to consider the social and political factors. In fact, it appears that they have avoided considering those factors altogether. We are convinced that had these factors been included, they would have clearly shown that these segments are not suitable. The current step is to assess the suitability of each of the segments previously determined to be eligible. During this phase all social and political factors are to be considered. (Letter 71, 157)

ANF – The general plan contains the following policies associated with Wild and Scenic Rivers, which are based on Utah State law codified at Section 63-38d-401(8). Duchesne County support for the addition of a river segment to the Wild and Scenic Rivers System shall be withheld until:

(iii) it is clearly demonstrated that the inclusion of each river segment is consistent with the plans and policies of the state and the county or counties where the river segment is located as those plans and policies are developed according to Subsection (3);

Duchesne County commented during the eligibility phase that designation of streams outside of existing wilderness areas would adversely impact water resource planning. As a result, the Upper Lake Fork River and Upper Rock Creek eligible segments were terminated at the High Uinta Wilderness Boundary rather than at Moon Lake and Stillwater Reservoirs.

Duchesne County requests the USFS consider the growing population in the Uintah Basin and the resultant growing need for water. The population of Uintah basin is predicted to grow from 42,633 in 2007 to 59,386 by 2050, due to the presence of oil, gas, oil shale and tar sands in the Uintah Basin.

Streams lying outside the High Uinta Wilderness should not be encumbered by designation to meet water resource demands in the future. Providing flexibility for water development for future generations is important enough to warrant a finding of unsuitability for all stream segments lying outside of wilderness areas. (Letter 124)

ANF – Green River - The community of Dutch John, Utah is heavily reliant upon the Green River for its livelihood. The community has a population of about 200 year round residents. The population more than doubles in the summer time due to the booming tourism industry centered around the river. The stretch of Green River managed by the Ashley National Forest receives roughly 97,000 visitors annually for boating, fishing, hiking, and other recreational purposes in the corridor. These visitors pump a lot of money into the local economy to guides, outfitters, restaurants, and hotels. There are 13 outfitters that hold permits to operate on this section of the Green River, six of which live full time in Dutch John. (Letter 209)

MLSNF – Your handouts gloss over any economic loss to the local area due to increased restrictions that may result to the timber, mining, or livestock users. This violates the intent of the law and shows a bias on the part of the Forest Service to favor the environmental groups. (Letter 247)

MLSNF – Agriculture is the principal economic activity in Sanpete County. Lack of sufficient irrigation water is a limiting factor for the County's economy. WSR designation of the Fish Creek segment would impair Sanpete County's ability to improve its agricultural economy. (Letter 125)

MLSNF – Huntington Creek and Left Fork of Huntington Creek – The Huntington Plant is a major direct and indirect employer in the area and an important part of the electric generation base for the western United States. PacifiCorp will oppose any action that impacts its ability to operate the Huntington Plant in the

manner that it has in the past or that restricts future plant operations. At the same time, PacifiCorp recognizes the important recreational and other values that are associated with the Huntington Creek and has expended considerable resources to make sure that its operations do not adversely impact those values. Huntington Creek provides critical social, economic, and other benefits to Carbon, Emery, and Sanpete Counties and to the entire state and region. The electricity produced at Huntington Plant is distributed throughout the western United States. Additionally, Electric Lake reservoir provides benefits that impact Huntington Creek including regulating flows downstream for agricultural irrigation, municipal use, fish habitat enhancement and flood control.

...PacifiCorp's coal plants including Huntington Plant, are the primary sources of electricity for the Wasatch Front. Currently there are insufficient additional transmission facilities leading from other areas to meet growth needs. If Huntington Plant were unable to produce power because of insufficient or constrained water sources, rolling brown-outs would occur. (Letter 163)

MLSNF – San Juan County is very arid, and water is key to any future opportunities for development. The smallest water resource may be critical to development in this county. Our water sources are so minimal, we can't believe the USFS sees them as wild rivers. Once these designations are in place it will be difficult to have them removed to allow our county the chance to expand. (Letter 265)

MLSNF – Chippean Rocks and Allen Canyon – We believe a designation could have a long range economic affect on San Juan County. Any use restrictions resulting from the designation could have a serious affect on grazing, mining, wood products, oil and gas exploration and development, water use and some forms of recreation, therefore impacting the economy of this county.

The San Juan County government, and the majority of people in this county, will not support a Wild and Scenic River designation on this area. (Letter 265)

MLSNF – Hammond Canyon – We do not support the idea of designating Hammond Canyon as a Wild and Scenic River...Water in Hammond Canyon barely exists so what qualifies it as a Wild and Scenic River? If there is any water at all in this canyon it will be desperately needed in the future development of this country. What is the benefit from designating this canyon as Wild and Scenic? For sure it is not a river. (Letter 265)

MLSNF – San Juan County does not support Chippean and Allen Canyons, Hammond Canyon, Lower Dark Canyon, Upper Dark Canyon and Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River.

San Juan County is a very depressed county as the following statistics demonstrate. While the rest of the country has enjoyed a large increase in wages and job earnings, San Juan County has been going in the opposite direction. The average earnings per job has fallen from \$27,903 in 1970 to \$22,480 in 2000. Net farm income was 9 million in 1970 and by 2000 had dropped to a minus 2 million. In 2000, 28% of transfer payments (retirement, disability, Medicare, dividends, interest, rent, welfare) was from welfare. In 2001 the unemployment was 9.1% in San Juan County compared to 4.4% statewide and 4.8% nationally. When unemployment figures on the Indian Reservations are factored in the unemployment rate for the County is 22%. On portions of the Navajo Indian Reservation, the unemployment rate is well over 50%. With 92% of the county in State, Federal or Navajo Reservation lands, anything that affects the management has a big impact on the county population. If Allen and Chippean Canyons, Hammond Canyon, Lower Dark Canyon, Upper Dark Canyon, and Mill Creek Gorge were included in the Wild and Scenic Rivers designation, it would carry with it the probability of reduced grazing, mining and oil exploration, water rights restrictions and other restrictions which would have a negative economic impact to the County. (Letter 252)

UNF/WCNF – Over one million people depend on Provo River Project water each year for municipal, industrial, domestic, and irrigation uses. The study must address the potential economic and environmental impacts any designation may have on PRP and the water supply the PRP provides for over one million people in north Utah and Salt Lake Counties. (Letter 218)

WCNF – This designation to any or all of these streams will significantly impact the social-economic well being of Uinta County and all of Southwest Wyoming. (Letter 81)

WCNF – The LEIS should consider impacts to future land use and economic sustainability for the Little Cottonwood Canyon communities. (Letter 111)

WCNF – The LEIS should include an evaluation of the possibility of increasing tourism due to the inclusion of Little Cottonwood Creek into the Wild and Scenic River System, and the affect this might have on the Town of Alta, the Little Cottonwood Canyon community, and resource management agencies. (Letter 111)

WCNF – Summit County Commission recommends including all listed portions and tributaries of the Bear, Weber, and Provo Rivers in Summit County. While they encourage recreation, they acknowledge Stewardship of the headwaters that feed much of northern Utah. Economic values of water ways extends beyond recreational amenities to agricultural products. Such recognition will bolster the respect we have for preservation and conservation of the natural resources of Summit County. (Letter 24)

WCNF – Being property owners on the Bear River, we feel that the wild and scenic rivers status from the origin of these rivers to the Utah Wyoming border will enhance property values and benefit the economics of the area as well as protect the wildlife and scenic values of this river. (Letter 269)

MULTIPLE – UEC believes that there will need to be a positive suitability finding for all outstanding rivers on these six National Forests, and at least for the following rivers:

- Green River (Scenic);
- Logan River System, including: Logan River from Idaho line to Beaver Creek (Scenic), Logan River from Beaver Creek to Third Dam (Recreational), Beaver Creek (Recreational), Bunchgrass Creek (Scenic), White Pine Creek (Wild), Spawn Creek (Wild), Temple Fork (Scenic), Little Bear Creek (Scenic);
- Headwaters of the Bear River, including: Hayden Fork (Recreational), Stillwater Fork (Wild & Scenic), Ostler Fork (Wild), East, Left, Righthand Forks of East Fork of Bear River (Wild), Boundary Creek (Wild);
- Upper Uinta River, including: Uinta River (Wild) and Shale Creek (Wild);
- Upper Yellowstone River, including: Upper Yellowstone (Wild) and Garfield Creek (Wild);
- North Fork of the Virgin River (Wild);
- Outstanding Segments of the Provo River, including: North Fork Provo River (Recreational), Little Provo Deer Creek (Recreational), Provo River – Trial Lake to UT-35 bridge (Recreational);
- Henrys Fork (Wild);
- Whiterocks River, including: Upper Whiterocks (Scenic), West Fork Whiterocks (Scenic), East Fork Whiterocks (Scenic), Reader Creek (Scenic), Middle Main Whiterocks (Wild);
- Fish and Gooseberry Creek (Wild & Recreational);
- Huntington Creek, including Huntington Creek (Recreational) and Lower Left Fork of Huntington Creek (Wild);
- Butts, Arch, and Texas Canyons (Wild on FS lands);
- Hammond Canyon (Wild upstream of trail 005, Scenic below);
- Dark Canyon (Wild below Rig canyon, Recreational along moto-trail);
- Moody Wash (Recreational);
- Chippean, Mule, and Deep canyons on MLSNF (Wild);
- Tuerto Canyon/North Cottonwood Creek on MLSNF (Wild);
- Shay Canyon on MLSNF (Wild);
- Vega Creek (Wild);
- Ruin Canyon (Wild);
- Manning Creek (Wild);

- Death Hollow Creek (Wild);

I strongly support finding all of these rivers suitable to become a Wild and Scenic River because they all possess qualities that cause them to rise to the top of all rivers on Utah's National Forests that are under consideration for inclusion in the National Wild and Scenic River System. Therefore, they are all deserving of addition to the national system and would contribute to the broad array of rivers that are protected in the system. Protecting these rivers will protect the things that make Utah the incredible place it is – preserving our quality of life and supporting local communities whose economies rely in part on the recreation and tourism generated by the rivers. (Letter 166)

MULTIPLE – I support a positive suitability finding for all outstanding rivers on Utah's National Forests, and especially for the following rivers:

- Green River (Scenic)
- Logan River System, including: Logan River from Idaho line to Beaver Creek (Scenic), Logan River from Beaver Creek to Third Dam (Recreational), Beaver Creek (Recreational), Bunchgrass Creek (Scenic), White Pine Creek (Wild), Spawn Creek (Wild), Temple Fork (Scenic), Little Bear Creek (Scenic)
- Headwaters of the Bear River, including: Hayden Fork (Recreational), Stillwater Fork (Wild & Scenic), Ostler Fork (Wild), East, Left, Righthand Forks of East Fork of Bear River (Wild), Boundary Creek (Wild)
- Upper Uinta River, including: Uinta River (Wild) and Shale Creek (Wild)
- Upper Yellowstone River, including: Upper Yellowstone (Wild) and Garfield Creek (Wild)
- North Fork of the Virgin River (Wild)
- Outstanding Segments of the Provo River, including: North Fork Provo River (Recreational), Little Provo Deer Creek (Recreational), Provo River – Trial Lake to UT-35 bridge (Recreational)
- Henrys Fork (Wild)
- Whiterocks River, including: Upper Whiterocks (Scenic), West Fork Whiterocks (Scenic), East Fork Whiterocks (Scenic), Reader Creek (Scenic), Middle Main Whiterocks (Wild)
- Fish and Gooseberry Creek (Scenic & Recreational)
- Huntington Creek, including Huntington Creek (Recreational) and Lower Left Fork of Huntington Creek (Scenic)
- Butts, Arch, and Texas Canyons (Scenic)
- Hammond Canyon (Scenic)
- Dark Canyon (Wild & Recreational)
- Moody Wash (Recreational)
- Manning Creek (Wild)
- Death Hollow Creek (Wild) (Letter 209, 118, 234, 238, 239)

I strongly support finding all of these rivers suitable to become a Wild and Scenic River because they all possess qualities that cause them to rise to the top of all rivers on Utah's National Forests that are under consideration for inclusion in the National Wild and Scenic River System. Therefore, they are all deserving of addition to the national system and would contribute to the broad array of rivers that are protected in the system. Protecting these rivers will protect the things that make Utah the incredible place it is – preserving our quality of life and supporting local communities whose economies rely in part on the recreation and tourism generated by the rivers. (Letter 58 to 69; 101; 119; 120; 206; 250 to 3,500)

These places are unique and fragile. (Letter 68)

MULTIPLE – You have some fantastic rivers on Utah's National Forests.

Green River; Logan River System; Headwaters of the Bear River; Upper Uinta River, Upper Yellowstone River and Garfield Creek; North Fork of the Virgin River; Segments of the Provo River; Henry's Fork; Whiterocks River; and many others.

I strongly support finding all of these rivers suitable for Wild and Scenic River status because they all possess qualities that make them excellent candidates for inclusion in the National Wild and Scenic River System.

Protecting these waterways will preserve the state's quality of life and supporting local communities whose economies rely in part on the recreation and tourism generated by the rivers. (Letter 228)

SF 110 – (10) Current administration and funding needs if designated.

Should not designate rivers because the USFS doesn't have and can't expect to receive funding for managing what designation brings. Use existing management procedures for protecting the values in the study areas. (Letter 14)

Any designation for 'wild' that includes the prohibition of motorized vehicles must include sufficient funding the law enforcement to ensure that violators be stopped. The Forest Service itself, nationally, recognizes that explosive use and abuse of ATVs as one of the top threats to federal public lands. If designation is in place, sufficient funding must be ensured that maintain the values that have made the area remarkable. We don't need more paper designations that get ignored on the ground. (Letter 70)

We do not believe Jack Troyer's statement that Wild and Scenic Rivers are key to retaining outstanding qualities of our state. The USFS have all the tools it needs to retain the qualities of our state. Designations tend to take away the decision process. There will come a time when managers will need to do something different, but find they are locked by the terms of designations. Designations only relieves managers of the responsibility to look at every action on its own merits and react accordingly. (Letter 265)

Duchesne County questions whether the federal government can afford to burden itself with increasing costs for administration of such things as Wild and Scenic Rivers when our treasured national park system is sorely under-funded; not to mention shortages across the board as a result of wartime and natural disasters. (Letter 124)

DNF – Moody Wash – There is no basis to expect that local government has the capability to provide protection to this segment, and given the fact that those who are familiar with the area would not view this segment as outstandingly remarkable, it is hard to envision a motivation to offer this segment special funding or other benefits. (Letter 154)

DNF – North Fork Virgin River (Kane County); East Fork Boulder Creek; Slickrock Canyon; Cottonwood Canyon; The Gulch; Steep Creek; Pine Creek; Mamie Creek; Death Hollow Creek (Garfield County); Moody Wash (Washington County) – These segments are too short for effective management under the wild and scenic river system. The existing federal system includes approximately 210 segments encompassing 11,408.9 miles. The average segment length is 54 miles. The median segment length is 29 miles. Less than 13 percent of the segments are 10 miles or shorter. The expenditure of scarce management dollars to prepare and administer a river management plan is not an effective use of taxpayer dollars, especially when existing management authorities will already protect the outstandingly remarkable values identified. Identification as suitable is an unnecessary redundancy. (Letter 122, Letter 149 – refers to N.F. Virgin River and Moody Wash only; Letter 268 – refers to Moody Wash only)

MLSNF – Current administration through USFS, BLM, State of Utah, and other government agencies and private interests is sufficient to protect the values of Huntington Creek. There is significant concern over the source of funding which would be required to implement W&SR designation and administration. (Letter 163)

MLSNF – *The federal agency that will administer the area, should it be added to the System.*

San Juan County does not support Chippean and Allen Canyons, Hammond Canyon, and Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River. It is assumed that should this be added to the system, it will be administered by the U. S. Forest Service. (Letter 252)

MLSNF – *The ability of the federal agency to administer and manage the area should it be added to the System.*

- San Juan County does not support Chippean and Allen Canyons, Hammond Canyon, or Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River.

There are no definitive bounds which mark these drainage's. Therefore the ability to on-the-ground delineate the boundary of this proposed Wild and Scenic River would be extremely limited.

Management of the area would likewise be extremely difficult, if not impossible. As described by the Forest Service, the thick and diverse vegetation, the steep slopes and cliffs, the relatively narrow riparian zone, narrow canyons with heavy underbrush all contribute to the difficulty in delineating the boundary and thus the management of this proposed Wild and Scenic River. As previously noted, Congress through ARPA, NEPA, NFMA, FLPMA, ESA, the Forest Management Plan, as well as many other laws and regulations has provided all of the tools necessary to administer, manage, and protect these canyons. The Forest Service does not expect additional outside funding from or because of Wild and Scenic Rivers Act. The agency would, however be required to use the current funding appropriation to implement and monitor a designated river segment. The Forest Service is already under staffed and under financed. The impacts that this could have on the overall management of Forest Service programs could be devastating to the agency. There is nothing to indicate that the Forest Service cannot continue, under multiple use management, to protect this canyon as they have in the past. (Letter 252)

- San Juan County does not support Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons or Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons as suitable for inclusion as a Wild and Scenic River.

There are no definitive bounds which mark this proposed waterway. Therefore the ability to on-the-ground delineate the boundary of this proposed Wild and Scenic River would be extremely limited.

Management of the area would likewise be extremely difficult, if not impossible. As described by the Forest Service, the vertical cliff walls, rim rock, outcrops, spires, alcoves, arches, moderately deep gorges, and narrow valley floors all contribute to the difficulty in delineating the boundary and thus the management of this proposed Wild and Scenic River. As previously noted, Congress through the Wilderness Act, ARPA, NEPA, NFMA, FLPMA, ESA, the Forest Management Plan, as well as many other laws and regulations has provided all of the tools necessary to administer, manage and protect these canyons.

The Forest Service does not expect additional outside funding from or because of Wild and Scenic Rivers Act. The agency would, however be required to use the current funding appropriation to implement and monitor a designated river segment. The Forest Service is already under staffed and under financed. The impacts that this could have on the overall management of Forest Service programs could be devastating to the agency. There is nothing to indicate that the Forest Service cannot continue to protect this canyon as they have in the past. (Letter 252)

MLSNF – *The estimated cost of the United States of acquiring necessary lands and interests in land and of administering the area, should it be added to the System.*

- San Juan County does not support Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons or Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River. Although there are no lands necessary to acquire, it can be expected that the cost of administering the area will be large.
- San Juan County does not support Hammond Canyon as suitable for inclusion as a Wild and Scenic River. Another problem with Wild and Scenic River status for this area is that of management. Our analysis of the on-the-ground management of this area would be very costly, difficult and cumbersome. Since there would be no additional financing available, management and protection of cultural resources in and around the area may well be compromised. (Letter 252)

WCNF – Little Bear Creek: Little Bear Spring to Mouth – This Creek is too short for effective management under the wild and scenic river system. (Letter 221)

SF 111 – (11) The extent to which the State or its political subdivisions might participate in the shared preservation and administration of the river, including costs.

UWCD and OPIC under no circumstance would participate in paying the costs of managing the corridor nor share in the cost of administration. Discussions held with other state and local governmental agencies indicate that they would not participate in funding or administering these potentially suitable river segments. (Letter 71, 157)

The narrative does not address how the team cooperated with state, local, and tribal governments or what these entities said about designation. These important considerations should be clearly presented to the public before a decision is reached on designating any candidate watercourse. (Letter 249)

Duchesne County is not in position to offer funding or management assistance for segments. (Letter 124)

SWCD does not have the funds to administer wild and scenic river corridors and is not willing to assume that responsibility. (Letter 125)

Section 63-38d-401 of the Utah Code Annotated defines the State of Utah 's policies and positions on Wild and Scenic River designations. The State of Utah has enacted the following statutes regarding the implementation of wild and scenic river management:

(a) the state's support for the addition of a river segment to the National Wild and Scenic Rivers System, 16 U.S.C. Sec. 1271 et seq., will be withheld until:

- (i) it is clearly demonstrated that water is present and flowing at all times;*
- (ii) it is clearly demonstrated that the required water-related value is considered outstandingly remarkable within a region of comparison consisting of one of the three physiographic provinces in the state, and that the rationale and justification for the conclusions are disclosed;*
- (iii) it is clearly demonstrated that the inclusion of each river segment is consistent with the plans and policies of the state and the county or counties where the river segment is located as those plans and policies are developed according to Subsection (3);*
- (iv) the effects of the addition upon the local and state economies, agricultural and industrial operations and interests, outdoor recreation, water rights, water quality, water resource planning, and access to and across river corridors in both upstream and downstream directions from the proposed river segment have been evaluated in detail by the relevant federal agency;*
- (v) it is clearly demonstrated that the provisions and terms of the process for review of potential additions have been applied in a consistent manner by all federal agencies;*
- (vi) the rationale and justification for the proposed addition, including a comparison with protections offered by other management tools, is clearly analyzed within the multiple-use mandate, and the results disclosed;*
- (vii) it is clearly demonstrated that the federal agency with management authority over the river segment, and which is proposing the segment for inclusion in the National Wild and Scenic River System will not use the actual or proposed designation as a basis to impose management standards outside of the federal land management plan;*
- (viii) it is clearly demonstrated that the terms and conditions of the federal land and resource management plan containing a recommendation for inclusion in the National Wild and Scenic River System:*

(A) evaluates all eligible river segments in the resource planning area completely and fully for suitability for inclusion in the National Wild and Scenic River System;

(B) does not suspend or terminate any studies for inclusion in the National Wild and Scenic River System at the eligibility phase;

(C) fully disclaims any interest in water rights for the recommended segment as a result of the adoption of the plan; and (D) fully disclaims the use of the recommendation for inclusion in the National Wild and Scenic River System as a reason or rationale for an evaluation of impacts by proposals for projects upstream, downstream, or within the recommended segment;

(ix) it is clearly demonstrated that the agency with management authority over the river segment commits not to use an actual or proposed designation as a basis to impose Visual Resource Management Class I or II management prescriptions that do not comply with the provisions of Subsection (8)(t); and

(x) it is clearly demonstrated that including the river segment and the terms and conditions for managing the river segment as part of the National Wild and Scenic River System will not prevent, reduce, impair, or otherwise interfere with:

(A) the state and its citizens' enjoyment of complete and exclusive water rights in and to the rivers of the state as determined by the laws of the state; or

(B) local, state, regional, or interstate water compacts to which the state or any county is a party;

(b) the conclusions of all studies related to potential additions to the National Wild and Scenic River System, 16 U.S.C. Sec. 1271 et seq., are submitted to the state for review and action by the Legislature and governor, and the results, in support of or in opposition to, are included in any planning documents or other proposals for addition and are forwarded to the United States Congress.

We respectfully request that the team recognize this statute and honor the provisions found therein as it determines the suitability of evaluated river segments. (Letter 122, 149)

In 2004, the Utah legislature adopted criteria that must be met before the state will support a recommendation. Because the WSRA requires support of the state, these criteria are even more important. Thus the EIS must also incorporate Section 63-38d-401 of the Utah Code Annotated statutes (a)(i-v) and (b) Utah Code 63-38d-401

The first two Utah criteria encompass eligibility issues, again supporting the point made earlier that the scope of the proposed action includes eligibility and thus the EIS cannot exclude eligibility issues on the basis that the decision has already been made. For example, there are factual issues as to whether some river segments involve intermittent or seasonal streams and are not in fact free-flowing. State law requires year-round flows, rather than seasonal or intermittent of flows.

Second, the ORV is to be based on regional comparison and tied to the water, rather than some other independent feature. In several cases, comments noted that the ORV features such as pictographs were independent and not associated with the river or its flows. Pictographs are already protected under the Archeological Preservation Act and National Historic Preservation Act. (Letter 165)

The portion of the Utah Code Annotated which deals with the State's support for the addition of a river segment to the National Wild and Scenic Rivers System is Section 63-38d-401(8).

...As we understand the Wild and Scenic Rivers legislation it is necessary to obtain the support of the State Legislature before submitting the segments to Congress for designation. Given that fact and the conditions set forth in Utah Law as cited (a)(i-iv), not one of the segments being presented in this suitability phase will ever be considered for designation and as such are a waste of everyone's time to take forward. Several of the segments being considered only have water in them for a small part of the year and would therefore not qualify under the state law. (Letter 71, 157)

Wasatch and Duchesne County (including Duchesne County Water Conservancy District) will withhold support until Utah Code Annotated, Section 63-38d-401(8) statutes (a) (i-iv) are met. (Letter 17, 19, 55)

We request that the State of Utah's statute (Title 63-38d-401) be followed as decisions are made regarding which segment identified in the study. (Letter 150, 152)

Cache County requests that those making decisions and recommendations follow the State of Utah Statute number 63-38D-401-(8)(a)(b) and honor the provisions found therein as it determines the suitability of each river segment during the “classification” process. We reserve any rights granted to Cache County by this statute. (Letter 221)

Adopt and Incorporate State of Utah Criteria – The study incorporates an MOU with the State of Utah and the previous responses to comments promised that the Utah criteria would be considered in suitability. *See* Summary of Public Comment & Forest Service Responses, Wild & Scenic Rivers Eligibility Process (March 2005) at (“The Ashley National Forest will consider State of Utah criteria for Wild and Scenic Rivers during the Suitability Study phase of the Wild and Scenic Rivers Process, as addressed in the Wild and Scenic Rivers Act (P.L. 90-542, as amended)). (Letter 165)

Very little coordination was done with either the state or the county to determine whether the inclusion of the segment is consistent with their plans and policies. We know of no efforts made to determine the effects of the addition of these segments on the local economies, agricultural and industrial operations and interests, water rights, water resource planning etc. The Forest Service has made no efforts to discuss UWCD’s concerns regarding water rights and effects on water resource planning.

In short, not one of the segments being presented in the suitability phase can meet all of the conditions as set forth in the state law and will therefore not obtain the support of the state. Why then is time and effort being wasted on them? (Letter 71, 157)

Duchesne County had no desire to participate in costs of administering a Wild and Scenic Rivers segment anywhere in the country. (Letter 124)

ANF – As far as UWCD knows, there is no support from any other federal, state, or local agency nor is there any agreement or desire to enter into an agreement to share the administration costs by any local or state government agency for Upper Whiterocks River, West Fork Whiterocks River, Reader Creek, East Fork Whiterocks River, Middle Whiterocks River. (Letter 71)

MLSNF – Huntington Creek and Huntington Creek Left Hand Fork – Emery County is adamant in opposing recommendation for designation. (Letter 77, 78)

MLSNF – SWCD does not have the funds or resources to participate in administering wild and scenic river corridors nor does it support WSR status for Fish Creek. (Letter 125)

MLSNF – *A determination of the degree to which the State or its political subdivisions might participate in the preservation and administration of the river, should it be proposed for inclusion in the System.*

- San Juan County does not support Chippean and Allen Canyons or Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons as suitable for inclusion as a Wild and Scenic River. The State or its political subdivisions will not participate in the preservation and administration of lands or rivers which are located on federal lands.
- San Juan County does not support Hammond Canyon, Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons, or Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River. The State or its political subdivisions will not participate in the preservation and administration of lands or rivers which are located on federal lands. It is highly unlikely that San Juan County or the State would be interested in participating in the preservation and administration of the Hammond Canyon, Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons, or Mill Creek should it be proposed for inclusion in the System. (Letter 252)

MLSNF – *State/local government’s ability to manage and protect the outstandingly remarkable values on non-federal lands.*

- San Juan County does not support Chippean and Allen Canyons or Hammond Canyon as suitable for inclusion as a Wild and Scenic River. Considering the budget status of the State and County, it seems highly unlikely that either would put much priority in managing and/or protecting any values on non-federal lands.
- San Juan County does not support Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons or Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons as suitable for inclusion as a Wild and Scenic River. No non-federal lands are involved.
- San Juan County does not support Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River. There are no non-federal lands in Mill Creek Gorge in the portion being considered as a wild and scenic river segment. (Letter 252)

SF 112 – (12) The state/local government’s ability to manage and protect the outstandingly remarkable values on non-federal lands.

ANF – On the Ashley NF, pre-eligibility forest management was sufficient to protect any ORVs. State and local government provide an advisory role under these circumstances. (Letter 124)

MLSNF – *The extent to which the agency proposes that administration of the river, including the cost thereof, be shared by State and local agencies.*

- San Juan County does not support Chippean and Allen Canyons, Hammond Canyon, or Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons, Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons, or Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River. San Juan County would not be supportive of sharing in either the administration or the cost of wild and scenic river designation of Chippean or Allen Canyon, Hammond Canyon, Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons, Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons, or Mill Creek Gorge. We feel it is highly unlikely that the State of Utah would share in the administration or cost thereof either. (Letter 252)

SF 113 – (13) Support or opposition to designation.

FNF – As an elected body of County Commissioners, representing the citizens of our county, we state that Millard County as a whole is against the designation of Corn Creek. (Letter 217)

MLSNF – Based on public involvement conducted by the SWCD, residents of Sanpete County openly and strongly oppose giving wild and scenic status to Fish Creek. This opposition includes elected city and county officials, appointed agency officials within the county, irrigation company board members, as well as the citizenry in general. SWCD intends to use all political means available to block designation of Fish Creek. (Letter 125)

MLSNF – Upper Dark Canyon – San Juan County government, and the majority of people in the county, will not support a Wild and Scenic designation of this area. (Letter 265)

MLSNF – *Support or opposition to designation.*

- San Juan County does not support Chippean and Allen Canyons, Hammond Canyon, Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons, and Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River. The vast majority of San Juan County residents do not support wild and scenic designation for Chippean and Allen Canyons, Hammond Canyon, Upper Dark Canyon, and Mill Creek Gorge. Many have expressed a strong opposition to such designation. Although no formal survey was conducted, over 95% of those contacted were opposed to Chippean and

Allen Canyons, Hammond Canyon, Upper Dark Canyon, and Mill Creek Gorge being designated as a Wild and Scenic River. (Letter 252)

- San Juan County does not support Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons as suitable for inclusion as a Wild and Scenic River. Most of those people contacted voice neither support nor opposition for designation of this area. They see no difference between Wild and Scenic River or Wilderness status. (Letter 252)

SF 114 – (14) The consistency of designation with other agency plans, programs or policies and in meeting regional objectives.

The designation of Wild and Scenic Rivers is consistent with the mission of the Forest Service and should be considered a positive tool by agency staff to ensure that they are protecting the public's trust. This designation will give agency staff the tools they need to manage the resource in the most resource-supportive manner. (Letter 70)

Other agencies, such as Utah Division of Natural Resources, must be consulted, in particular regarding future water resource development projects that will be needed to serve the growing population in the Uintah Basin and the State of Utah (A significant amount of water available on the Wasatch Front is piped from the Uinta Mountains by the Central Utah Project). (Letter 124)

Wild and Scenic designation is consistent with any other agency plans to protect the listed species. I urge the FS to consider any river segment with a listed species as a positive suitability factor for the river being designated. (Letter 118)

All rivers on Park Service's NRI are eligible and should be included in suitability review.

...Federal agencies must make an eligibility determination for NRI rivers.

...Court case shows NRI rivers must be found eligible and included in study 394 F. 3d at 1111; 16 U.S.C.

...No potentially eligible category exists thus all rivers on NRI in FS jurisdiction should be part of suitability review. (Letter 118)

Wild and Scenic River designation is also consistent with many of the goals of the Governor of Utah. Specifically, designation is consistent with the following goals:

- 1) Enhance Utah's National and International Image - proactively increase awareness outside Utah that Utah is the place for businesses, conventions, *tourism*, and good living;
- 2) *Promote tourism* – actively promote responsible hunting, fishing, and outdoor recreation; and
- 3) Energize economic development in rural communities.

Wild and Scenic designation would highlight the truly remarkable, national and world famous rivers of Utah. Wild and Scenic rivers in Utah would definitely enhance Utah's national and international image.

Designation would also aid in promoting tourism within Utah. Tourists throughout the United States and the World would be excited to come and visit the Wild and Scenic rivers in Utah. This increase in tourism would generate greater revenue and lead to economic benefits to those communities near to where the rivers are located. In many cases these are rural communities that would benefit. (Letter 209)

The general plan contains the following policies associated with Wild and Scenic Rivers, which are based on Utah State law codified at Section 63-38d-401(8). Duchesne County support for the addition of a river segment to the Wild and Scenic Rivers System shall be withheld until:

(iv) the effects of the addition upon the local and state economies, agricultural and industrial operations and interests, outdoor recreation, water rights, water quality, water resource planning, and access to and across river corridors in both upstream and downstream directions from the proposed river segment have been evaluated in detail by the relevant federal agency;

It has not been demonstrated to Duchesne County that the USFS process for review of potential additions to Wild and Scenic River system have been applied in a manner consistent with the BLM, which has been

studying Wild and Scenic River eligibility and suitability as part of Resource Management Plan updates. (Letter 124)

As a cooperating agency, we expect the Forest Service to make an effort to ensure that land management decisions are consistent with local plans and policies. For decisions within Duchesne County, the county general plan is applicable. (Letter 124)

ANF – Interstate Issues – Colorado River Compact Issues – WSRA management establishes limits on water diversions upstream that might affect flows within the identified segment. The Colorado River System, of which the Green River and its tributaries are an important part, is fully appropriated and committed. Both Wyoming and Colorado water engineer's offices should be consulted to determine the impediments to designation.

Sending a letter to the Utah Department of Natural Resources, as the Forest Service stated was sufficient, does not develop relevant data regarding existing water rights and the effects of the water rights on the flows. The existing data are therefore deficient and need to be significantly expanded.

The State of Colorado and local conservancy districts are developing storage on the Yampa and Green Rivers to meet Colorado water needs and to ensure retention of all compact water rights. These planned projects and existing water rights directly affect flows of water into Utah on the Green River. (Letter 165)

ANF – Lower Dry Fork Creek – The inconsistencies, errors and problems with the report on this segment are indicative of all of the other segments. The segment begins at the Dry Fork Sinks and continues through private land and BLM administered lands. The gauging station at the end of the segment is not on BLM land as reported but rather on private land. As we understand it, the BLM did not include this segment in their Wild and Scenic study and the report states that the only value that is rated high that extends beyond the National Forest Boundary on to land administered by the BLM is the Geologic/Hydrologic value. Given these facts, why is the Forest Service including a portion of the segment that is administered by the BLM? ... This fact along with the fact that the Forest Service is including a section administered by the BLM when the BLM did not include it shows a real inconsistency in applying the factors to determine suitability within the Forest Service and between governmental agencies. (Letter 71)

ANF – Ashley Gorge Creek – The lower part of this segment is on BLM administered lands and ends at private land. The BLM did not include this segment in their Wild and Scenic study. (Letter 71)

ANF – Green River – The Utah DWR administers several miles of the land along the river bank, which has grown due to the recent purchase of a parcel of property on the south bank of the river across from Little Hole. The piece of property previously owned by DWR is managed to maintain wildlife and fish habitat. DWR acquired this parcel of property as mitigation at the time of the construction of Flaming Gorge Dam. Thus, there are several restrictions on uses and management of this land, such as no roads, no rights of way, and no development. The recently acquired piece of property will most likely be managed similarly. This type of management is consistent with Wild and Scenic River designation. Wild and Scenic River designation is also consistent with the status of this stretch of the Green River as a Blue Ribbon Fishery by the State of Utah. Blue Ribbon Fishery status indicates a high quality fishery, thus the stretch is managed to maintain the high quality fishery. (Letter 209)

DNF – I strongly support and urge the Forest Service to carry forward for detailed DLEIS analysis all of the river and stream segments found to be eligible for suitability evaluation in the scoping notice. For example, I concur that the Forest Service portion of the North Fork of the Virgin River is highly eligible and worthy of suitability study. I believe that the previously introduced Washington County Growth and Conservation Act legislation (by Senator Bennett and Congressman Matheson) would have designated this river downstream on some BLM and NPS (Zion National Park) administered lands. As such, it would be consistent for the Forest Service to consider protection for its segment upstream. I also believe that this Forest Service segment would receive the same strong public support for protection that the downstream BLM and NPS

segments received. This federal legislation did not pass because of some controversial provisions, especially relating to proposals to authorize public land sales, the Lake Powell pipeline, and the Northern Corridor. As far as I know, no one questioned or objected to the provision to designate these BLM and NPS river segments. (Letter 162)

DNF – The North Fork of the Virgin River downstream in Zion National Park has already been found eligible to become a Wild and Scenic River. Therefore, designating the headwaters of the river is consistent with the downstream protection. The headwaters of this world-renowned river are vital for protecting the water quality downstream. (Letter 118, 209)

DNF – Death Hollow Creek located in south-central Utah begins on the DNF and then flows off onto the Grand Staircase Escalante National Monument. The Monument has already found Death Hollow Creek eligible, and so the stretch of Death Hollow on the Dixie should be given a positive suitability factor for its contribution to the continuous free-flowing stretch of Death Hollow Creek (Letter 209).

DNF – Letters considered by Kane County during recent BLM W&S Planning

The County, during recent BLM W&S planning, received four letters opposing local support of wild and scenic river designations.

The town of Fredonia submitted a letter advising that the town was “diametrically opposed” to further designation of Cottonwood Canyon, Water Canyon, North Fork Indian Canyon or South Fork Indian Canyon.

Attorney Thomas J. Bayles, representing Split Rock Inc. and its various affiliates owning or controlling a few thousand acres of land in Kane County, expressed concern for interim management restrictions, impacts to up stream development and private property impacts. Mr. Bayles pointed out the fact that no nominations from the public were received, the lack of notice to private land owners adjacent to proposed segments, current protection provided under WSA and ACEC provisions, consideration of private property historic and current good stewardship practices and down stream impacts to existing contract rights involving planned development of private property upstream of proposed segments.

Michael E. Noel, Executive Director of the Kane County Water Conservancy District, expressed concern about the potential impacts of wild and scenic river designations throughout the county as they could significantly impact water development county-wide. The Cove Reservoir is scheduled to be built south of Orderville to be supplied by water from the East Fork Virgin River as well as several other East Fork projects allowed by the *Zion National Park Water Rights Settlement Agreement*. The District has been approached to assist in water development within the Paria River drainage up stream of the proposed Paria River wild segment. The District advised that it should be a direct partner in any planning designation affecting water use in Kane County. The District advised that current resource protections were adequate to protect the values ascribed in the Wild and Scenic Act. The District stressed the point that the Zion NP Agreement settled water development up gradient from Zion NP and mitigates the need for additional protection measures for those affected rivers.

Ray Spencer, representing the East Zion Special Service District, pointed out that the District provides water and waste water service to the area east of Zion NP, including segments on the North Fork Virgin River, East Fork Virgin River, Orderville Gulch, Bob Creek, Meadow Creek, Mineral Gulch and Deep Creek. The District specifically objected to the proposed designations of these watercourses. The District proposed that its Capital Facilities Plan should be considered during this planning process. The District raised the issue that “[t]he setting of additional restrictions on water use up gradient from the Park is probably in violation of [*The Zion National Park Water Rights Settlement Agreement*].” The District also pointed out that local segments appear to be of low priority with respect to Section 4(a) of the Act and that the Draft Evaluation Report did not specify the criteria or documentation supporting the proposed river segments as perennial and free-flowing. (Letter 109, 110)

Previous Kane County Process in BLM W&S Planning

The County vetted the issues of river segment suitability and local support for Wild and Scenic River designations through the Kane County Resource Development Committee. The Committee approved a

motion recommending that the Kane County Commission NOT support any Wild and Scenic River designations in Kane County by a vote of eight to one.

The County Commission considered the issue in a public commission meeting attended by BLM and the public. The Commission subsequently approved a motion accepting the Resource Committee's recommendation to NOT provide local support for any Wild and Scenic river designations in Kane County. The lack of local support for river designations in the BLM process as well as the lack of State and local support in the 1997 Memorandum of Understanding process should be fully considered prior to suitability decisions.

Given this recent policy development regarding W&S segment designations in BLM planning it is unlikely that Kane County would provide any level of support for the North Fork of the Virgin River as a congressionally designated "wild" river. (Letter 109, 110)

DNF – Moody Wash - The BLM, which manages the wash downstream from the Forest Service has applied the evaluation criteria and found Moody Wash not exhibiting the ORVs necessary for classification as either eligible or suitable. (Letter 268)

MLSNF – Designation of Fish Creek would be highly inconsistent with other agency plans, programs and policies. Land within the Fish Creek watershed had already been withdrawn from the Forest for water resources development by the Secretary of the Interior. SWCD continues to diligently pursue implementation of the Narrows Project. Planning on this project has been underway for 70 years. The BOR is currently preparing and EIS for the Narrows Project. The Army Corps of Engineers and the USFS are cooperating agencies for that EIS. The March 1998 Narrows Project DEIS is incorporated into this report by reference.

Carbon County water users organizations including Carbon County Water Conservancy District and the Price River Water Users Association have signed contracts that require Scofield Reservoir to be operated in accordance with the Gooseberry Project Plan. Development of the Narrows Project is essential in order to fulfill those contractual obligations. Wild and Scenic designation of Fish Creek would impair existing plans. (Letter 125)

MLSNF – Fish and Gooseberry Creeks – Designating these Creeks is consistent with other management plans in the area. The Creeks are managed as a semi-primitive, unroaded area. (Letter 210)

MLSNF – Hammond Canyon – Near the mouth of the canyon is an in-holding belonging to the Ute Mountain Ute Tribe. I understand they use the property in conjunction with their Tribal member's lands in South Cottonwood as well as for livestock grazing in association with their forest permits. How would designation of the canyon effect the Tribe's ability to use its property? If designated, how does the Forest expect the Utes to share in management of this corridor, especially where it crosses their in-holding? If they are unwilling or unable to participate in maintaining the watercourse, how would that affect the values of the whole canyon? (Letter 249)

MLSNF – Chippean and Allen Canyons – The map at the Monticello open house showed the candidate watercourse extending southward outside of the National Forest boundary onto individual Indian Allotments held by members of the Ute Mountain Tribe. Is the Tribe aware of this and do they support it? If the Tribe is unwilling or unable to participate in maintaining the relevant qualities, how would that affect the values of the Chippean and Allen Canyons watercourses as a whole? (Letter 249)

MLSNF — Our group does not support the idea that Chippean Rocks and Allen Canyon are suitable for designation...The USFS has not followed their own criteria during the process. The process said that the USFS and BLM would work together to develop criteria. Why does the USFS believe Allen Canyon is suitable but the BLM does not? Yet the USFS uses the majority portion of the description of the ORVs on BLM state and private lands as support in making the decision that the area is eligible. (Letter 265)

MLSNF – San Juan County does not support Chippean and Allen Canyons as suitable for inclusion as a Wild and Scenic River.

In practice it appears that the BLM and Forest Service neither worked cooperatively nor used a uniform methodology and consistency in determining eligible river segments. For example, the BLM determined that Allen Canyon did not meet the criteria to be considered eligible. Whereas the Forest Service evaluated not only the Forest Service land but included the BLM land which adjoins the Forest Service and private land belonging to the White Mesa Ute Indians in making their determination of eligibility.

In determining the eligibility of these segments, the Forest Service used a major portion of the description of the outstanding remarkable values from BLM, State, and private lands. These are the same segments found ineligible by the BLM. San Juan County does not feel that the Forest Service portion of these segments meets the standards necessary to be eligible as a Wild and Scenic River.

...In their evaluation, the BLM did not consider the Chippean & Allen Canyon as eligible for inclusion as a Wild and Scenic River. There appears to be an inconsistency in evaluation between the BLM and Forest Service. (Letter 252)

MLSNF – *The consistency of designation with other agency plans, programs or policies.*

San Juan County does not support Chippean and Allen Canyons, Hammond Canyon, Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons, Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons, and Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River.

The designation of this wild and scenic river is in conflict with the San Juan County Master Plan (Chapter 1 Policy on Public Lands, Federal/State: pages 9-13; Policy on Multiple Use: pages 13-15; Policy on Public Access: pages 15-17; Policy on Public Land Classification: pages 18-21; Policy on Private and Public Land Ratios: pages 22-24; and Policy on Water Resources: pages 30-32). (Letter 252)

WCNF – The LEIS should include a review and evaluation of the Town of Alta's General Plan, the Salt Lake County Canyon's Master Plan, the USFS Forest Plan, Salt Lake City's Watershed Management Plan, Alta Ski Lift Co.'s Master Plan and Snowbird's Master Plan. In addition, a watershed management plan is being conducted for the entire Jordan River Watershed, which includes Little Cottonwood Sub-Watershed, which will update the 1989 Wastewater management Plan for the watershed (consider both plans). (Letter 111)

WCNF – Logan River – Designation is consistent with the Beaver Creek Watershed Improvement Project, sponsored by Sitla, USFS and Trout Unlimited. (Letter 209)

SF 115 – (15) Contribution to river system or basin integrity.

Duchesne County is confident that when the river segments within the county return to pre-eligibility management, that the USFS will ensure that river system or basin integrity is maintained via other means. (Letter 124)

The Forest should consider any eligible rivers that are part of a larger river system as a positive suitability factor, leading the segment towards being found suitable as a Wild and Scenic River, due to the importance of an interconnected river system and adverse effects that could arise due to fragmentation of a river. For example, finding one segment of the Logan suitable and another not suitable could allow a dam to be built on the non-suitable segment in the future. Dams are known to have adverse effects in downstream locations via changes in the timing, magnitude, duration, and frequency of flood events. Thus, a future dam on the Logan River or one of its tributaries could present a significant threat to the integrity of a downstream segment designated as a Wild and Scenic River. This would be counter to the purposes of the Wild and Scenic River Act by destroying the natural character of the designated river (Letter 209).

ANF – The Green River drains the entire northeast corner of Utah, or about one-quarter of the entire area of the state. The landforms drained by the Green in Utah range from the highest part of the state, in the Uinta Mountains, to some of the lowest, in the Uinta Basin. In its course through Utah, the Green drops from an elevation of approximately 6,000 feet at Flaming Gorge Reservoir to about 3,000 feet at its confluence with the Colorado. The stretch of the Green River being considered as part of this process is only 12 miles long, but it is the northernmost free-flowing part of the river in Utah. This 12 mile segment of the Green River in the Ashley National Forest, the most upstream, un-dammed stretch of the river in Utah must receive protection due to the important role that the Green River plays in the entire state of Utah, and the basin. (Letter 118, 209)

ANF – Green River - the attributes of this outstanding river cannot be denied. The Green River flows past Browns Park National Wildlife Refuge and through Dinosaur National Monument and Canyonlands National Park. The segments managed by the Forest Service should receive WSR status to protect their contribution to the Green River system. (Letter 203, 102)

ANF – Uinta River and Shale Creek – This segment of river is the headwaters for the Uinta River, one of the major tributaries of the Duchesne, which is itself one of the major tributaries of the Green River. Yellowstone River segments are located at the headwaters of the Yellowstone River. The Yellowstone is a tributary of the Duchesne, a major tributary of the Green River. A healthy protected headwaters area provides protection to the river downstream by preventing poor water quality. Additionally, a healthy headwaters area works to prevent erosion at the topmost point on the stream, thereby preventing scouring and heavy erosion on all portions of the river downstream, improving the downstream quality of the river and minimizing impacts to downstream portions of the river and treatment costs. (Letter 118, 209)

ANF – Uinta River and Shale Creek – The area along the river corridor includes many wetlands. A healthy, functioning riparian wetland corridor is very important for maintaining the river system integrity. It helps to hold soils in place, minimizing erosion and decreasing sedimentation into the stream. The wetlands also filter any nutrients coming into the stream in order to maintain good water quality, and they help to maintain channel stability by holding the soils in place and by holding water. Finally, wetlands serve to mitigate floods by absorbing excess waters overflowing the natural streambed. (Letter 118, 209)

ANF – The Whiterocks River provides habitat for a variety of wildlife, including bighorn sheep, moose, elk, mule deer, mountain goat, pine marten, and others. Furthermore, Reader Creek provides habitat for the Colorado River Cutthroat Trout, conservation – agreement species. The Whiterocks Canyon also serves as an important migration corridor for black bear and other large mammals. Downstream the Whiterocks passes through several communities before flowing into the Uinta, then the Duchesne and finally the Green River. Thus, the Whiterocks provides flows for the magnificent Green River. (Letter 118, 209)

DNF – Moody Wash does not contribute to the river system or basin integrity in a materially greater fashion than any other tributary of the Santa Clara River. (Letter 154)

DNF – Moody Wash is an intermittent stream on the Forest. However, the flows of the stretch of Moody Wash on the Forest play an incredibly important role for the section of the river just below the Forest where there are several rare and unique fish species. Moody Wash on the Forest contributes nearly 4/5 of the annual flow to the lower portion of the river. Thus, the portion of Moody Wash on the Forest serves a vital role in the overall river system. If additional diversions were built on the portion of Moody Wash in the Forest more water would be removed from the river, which would greatly threaten the survival of all of the rare fish species on the portion of Moody Wash just below the Forest boundary (Letter 118, 209).

DNF – Death Hollow Creek is one of the tributaries of the famous Escalante River. This segment of the creek includes the headwaters, located in an area on the eastern side of the Box Death Hollow Wilderness Area. (Letter 118, 209)

FNF – Manning Creek is the heart and soul of the gorge through which it passes. Without the water in the creek there would be no BVCT and the riparian vegetation would also suffer. The wildlife that relies on the water in the creek would also be in great peril without the existence of the creek. Thus, Manning Creek plays a crucial role in the survival and shaping of the entire ecosystem. Of special note is the especially productive BVCT that reside in the creek. (Letter 118, 209)

MLSNF – Gooseberry and Fish Creeks are headwater tributaries to the Price River, which is a tributary to the Green River in Utah. In general, headwater tributaries are deserving of protection because of the functions they perform. They support riparian wetlands that in turn support flood control. Those same wetlands filter nutrients that might otherwise enter the stream. They also provide significant high elevation (in the west) wildlife habitat that is increasingly rare elsewhere because of human encroachment. The riparian wetlands supported by Gooseberry and Fish Creeks are noticeably healthy and robust which differentiates them from most other waterways in Utah. Willow and cottonwood species are thick within the corridor and the soils are highly organic. Such soils act as sponges to absorb high flows in the spring, and release them slowly into the stream as the summer progresses. This sponge-like absorption is critical to prevent downstream scouring of the stream bank and bed. The flows released late season are invaluable to downstream water quality and fish and wildlife habitat, especially in the arid environment of the Price River basin. (Letter 118, 209)

MLSNF – Huntington Creek and the Lower Left Fork of Huntington Creek are incredibly important for providing habitat for fish and the myriad of recreational opportunities present. Water and river flows in this entire area are heavily regulated by various reservoirs and in order to maximize operations of the PacifiCorp Power Plant. The technical report completed on Huntington Creek states that flexibility to control river flows is essential to operations of the PacifiCorp plant. While this may be the case, maintaining a healthy, functioning river is absolutely critical to the survival of the fish in this Blue Ribbon Fishery. Furthermore, Huntington Creek is a tributary of the San Rafael River, a tributary of the Green River. Protecting the riverine ecosystem of Huntington Creek will protect these downstream rivers. Thus, the preservation of Huntington Creek and Lower Left Fork of Huntington Creek are vital to maintaining a healthy fish population, for continuing to provide high quality recreational experiences, and to ensure adequate water flows to all downstream water users. (Letter 188, 209)

MLSNF – *Contribution to river system or basin integrity.*

- San Juan County does not support Chippean and Allen Canyons as suitable for inclusion as a Wild and Scenic River. No contributions to other regional objectives/needs could be identified by the San Juan County Public Lands Council.
- San Juan County does not support Hammond Canyon, Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons, and Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons as suitable for inclusion as a Wild and Scenic River. Due to the lack of perennial water, Hammond Canyon and Dark Canyon have a very limited riparian zone. There are no fisheries or other water related attributes. High intensity rainstorms on the ledges and slickrock can produce high sediment loads. There appears to be no evidence that Hammond Canyon and Dark Canyon contributes to the river system or basin integrity.
- San Juan County does not support Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River. The Public Lands Council could not identify any changes in basin system integrity with or without Wild and Scenic River designation. (Letter 252)

UNF/WCNF – The Provo River is an incredibly important river for residents of the Wasatch Front for multiple reasons and is well known outside of the area. Residents of the Wasatch Front rely on the Provo River to meet their drinking water needs. All three of these segments play vital roles in helping to supply water to meet urban water needs. The water of the Provo River is clear, clean water. An indication of the high quality water is that the City of Provo has begun bottling the water. Wild and Scenic River designation

of these segments will ensure that these segments are protected and will therefore help maintain a healthy, functioning watershed so that the river can continue to supply water to the urban population. Each of these segments is located among either the headwaters of the main stem or the headwaters of a tributary of the Provo. Headwaters serve a vital role for maintaining a healthy, properly functioning river system. (Letter 118, 209)

WCNF – Henry’s Fork is also a tributary of the Green River, although the Henry’s Fork now enters into Flaming Gorge reservoir. A healthy river at the headwaters helps to protect the downstream portions of the river, including the waters entering into Flaming Gorge Reservoir. (Letter 118, 209)

WCNF – The Bear River watershed begins in Utah in the Uinta Mountains and travels through southwest Wyoming, southeast Idaho, and ends in Utah draining into the Great Salt Lake. During its journey the Bear River slices through the Bear River Mountain range known for its regionally-important conservation corridor that links the northern and southern Rocky Mountains.

One major component of the Bear River watershed is the mountain range known as the Bear River Mountains, located in northern Utah and southern Idaho. This relatively narrow tract of Forest Service land is part of the WCNF is a key component of the western United States, biological corridor system. Corridors are areas that remain largely undisturbed or unfragmented, providing important migration links between critical zones of habitat for both plants and animals. These migration pathways are essential for the viability and persistence of species diversity and ecosystem health. The corridor created by the WCNF is an 18-mile-wide “critical choke point” that offers the ONLY major link for species migration between the northern and southern Rockies—specifically, the Greater Yellowstone ecosystem, Utah’s High Uintas Wilderness Area, and the state of Colorado.

When human development such as industrial extraction, recreation, and road building limits genetic diversity by habitat fragmentation, species begin disappearing at alarming rates. Restoring linkage corridors at both the local and regional levels is critical to ensuring the long-term health of the watershed and the diverse species that depend upon it.

The Bear River supports an enormous diversity of ecosystems, flowing through a number of historical periods, geologic conditions, recreational opportunities, and absolutely amazing scenery. The Bear River begins in the High Uintas Wilderness Area where it has several tributaries including Stillwater Fork, Ostler Fork, Hayden Fork, and the East Fork of the Bear River. These headwaters areas are incredibly scenic, providing excellent fishing, hiking, camping, and provide crucial wildlife habitat. The Bear River is the largest tributary of the Great Salt Lake, providing 60 percent of its annual inflow.

Contribution to River System/Basin Integrity – The headwaters of the Bear River are enormously important to the entire watershed and to the integrity of the Great Salt Lake including the Bear River Migratory Bird Refuge. This refuge comprises wetlands that are extremely important to bird migration and is critical habitat for over 270 species of migratory bird species.

The Great Salt Lake and its associated habitat have been recognized as a “Hemisphere Reserve” for residential and migratory birds. This is a designation that only 16 sites have received in the Western Hemisphere Shorebird Reserve Network. Therefore, the habitat in this area is not only essential to the preservation of Utah’s bird species, but critical to the health of populations throughout the Western Hemisphere.

Thus, the headwaters of the Bear River are important for the habitat they provide for wildlife and also for the role they play in the broader Bear River ecosystem.

Values of the Bear River

Fish and Wildlife – The headwaters of the Bear River are home to a wide variety of fish and wildlife, including sensitive species of Canadian lynx, river otter, and pure strains of Bonneville Cutthroat Trout. Hayden Fork also supports Leatherside chub, a state sensitive species. Some other larger animals are mule deer, moose, elk, and mountain goat. Many smaller terrestrial species include pika, pine marten, and wolverine.

Recreation – The recreational opportunities among the headwaters of the Bear River are as diverse as the river itself. Popular activities include hiking, camping, fishing, sightseeing, horseback riding, hunting, and kayaking. (Letter 112)

WCNF – The main stem of the Logan River in northern Utah is broken down into two different segments: one from the Idaho border to the confluence with Beaver Creek and one from the confluence with Beaver Creek down to third dam. These two segments of the Logan have different tentative classifications. The Logan River is one system and each eligible river segment should be given a positive suitability factor for its contribution to the overall river system or basin integrity. This includes all of the tributaries of the Logan in addition to just the main stem. (Letter 209)

WCNF – Each tributary of the Logan River is absolutely crucial for the survival of the BVCT. The BVCT is listed as a State Sensitive Species in Utah and is also subject to an interstate Conservation Agreement. BVCT currently only occupy 33 percent of their historical range. A major cause of this reduction in range is habitat degradation, caused by water diversions, overgrazing, and impoundments. The Logan River system is very unique in that the main stem of the river and all of its tributaries are unregulated and therefore allow the BVCT to migrate to the spawning grounds. Additionally, the river basin provides habitat to several endangered and threatened species. The *Primula maguirei*, an endangered plant species, occurs on moist cliff sites. Three candidate species are also located in Logan Canyon: *Penstemon compactus*, *Erigeron cronquistii*, and *Musineon lineare*. These three species are known to occur only in Cache County and therefore add increased importance to the Logan River system. (Letter 118, 209,202)

WCNF – The Logan River and its tributaries are one of the last intact river systems in Utah that are unregulated by dams. This river system possesses a unique and incredibly important meta-population of Bonneville Cutthroat Trout (BVCT). This river system is the largest intact river system with BVCT in Utah. Furthermore, this river, which runs from the border of Idaho down towards the mouth of Logan Canyon passes through varying terrain, ranging from wide open basins at higher elevation to narrow river gorges lined by towering limestone cliffs. Logan Canyon’s incredible geology is a unique karst terrain that is responsible for interesting features such as Logan Cave and Ricks Spring. (Letter 209, 118)

WCNF – The headwaters of the Bear River are enormously important to the entire Bear River drainage and to the integrity of the Great Salt Lake. The Bear River provides 60 percent of the annual inflow to the Great Salt Lake. The Bear River and Great Salt Lake form one of the most valuable natural flyways for migrating birds in the country. Thus, the headwaters of the Bear River are important for the habitat they provide for wildlife and also for the role they play in the broader Bear River ecosystem (Letter 118, 209).

MULTIPLE – The Utah Rivers Council urges the Forest Service to give the following eligible river segments a positive suitability factor for their contribution to river system/basin integrity:

- Green River
- Logan River System: Logan River – Idaho State line to confluence with Beaver Creek; Logan River – Confluence with Beaver Creek to Bridge at Guinavah-Malibu; White Pine Creek; Temple Fork; Spawn Creek; Beaver Creek; Bunchgrass Creek; Little Bear Creek
- Headwaters of the Bear River: Hayden Fork; Ostler Fork; Stillwater Fork; Boundary Creek; Left, Right, and East Forks Bear River
- Whiterocks River: Upper Whiterocks River; West Fork Whiterocks River; East Fork Whiterocks River; Middle Whiterocks River; Reader Creek
- Uinta River System: Upper Uinta River; Shale Creek, Center Creek, and Gilbert Creek
- Yellowstone River System: Upper Yellowstone Creek; Garfield Creek
- Death Hollow Creek
- Sheep Creek: Middle Main Sheep Creek; Lower Main Sheep Creek
- Black’s Fork: East Fork Black’s Fork; Little East Fork Black’s Fork

- Ashley Creek System: South Fork Ashley Creek; Ashley Gorge Creek; Black Canyon
- East Fork Boulder Creek
- Slickrock Canyon
- Cottonwood Canyon
- The Gulch
- Steep Creek
- Pine Creek
- Mamie Creek (Letter 209)

SF 116 – (16) Demonstrated or potential commitment for public volunteers, partnerships, and/or stewardship commitments for management and/or funding of the river segment.

Involve communities near the river. (Letter 28)

The presence of two suitability factors is distressing: demonstrated commitment by volunteers / partners, and support / opposition to designation. Neither factor has anything to do with natural qualities or existing forest management prescriptions. Is the Forest Service really saying a watercourse is eligible only if an advocate is willing to invest in its stewardship, or that the threat of a lawsuit confers eligibility? (Letter 249)

MLSNF – Red Rock Forests is committed to assisting the Manti-La Sal National Forest, by providing volunteers and partnering, in managing any and all segments that are designated as Wild and Scenic within the forest. We are currently working in a partnership with the Moab Ranger District on several rehabilitation projects in the La Sals and Abajos, as well as collecting valuable data for use in future travel planning. (Letter 70)

SF 117 – (17) Other.

We believe that within the context of the Forest Service’s “multiple use” mandate there should always be an emphasis on restoring and protecting natural processes and conditions. As the ever-growing population creates more demands on our natural environment, public land agencies need to remain extremely far-sighted. As land managers recognize the continued degradation to our public lands they must find a new shift in their objectives from a commodity emphasis to one that restores and sustains ecosystems. This process can be one of those shifts. As Climate Change undeniably begins to alter the earth’s eco-systems, protecting these river resources for future generations is paramount. (Letter 112)

I fully support Wild and Scenic status for all of the rivers on your list (as seen on the Utah Rivers Council list). As the highest personal priority, our family tries to take annual trips on the Green River (Deso-Gray). What a national treasure that is. Where else can you have an almost 100 mile trip through such wild, untrammeled, beautiful country? If that river doesn't qualify as Wild and Scenic, nothing does. Our valuable natural resources must be preserved, not wasted. (Letter 146)

Of special concern should be those waterways that are already in areas designated sensitive or protected. I support efforts to fairly and effectively offer the protection we need for long-term health of ourselves and the environment. (Letter 89)

ANF/WCNF – I do support all of the High Uintas rivers deemed suitable by the USFS and the State of Utah. None have any tangible suitability conflicts.

Also include Carter Creek with its lush willow and riparian areas; Green River whose deep canyons, high rapids, cottonwoods and trout and bighorn sheep create a scenic 13 mile paradise; Upper, West, East, and Middle Whiterocks River with its alpine/subalpine and open lush riparian areas. Reader Creek; Ashley Gorge Creek’s 10 miles of deep, wild canyons; Black Canyon whose deep canyons are inaccessible.

Boundary Creek runs through dense, old growth and is inhabited by cutthroat trout. Cart Creek flows through dense forest down to sage covered slopes. The Main and Middle Fork of the Weber River is the heart of the Lakes Roadless Area with slickrock falls, dense forests, and deep canyons. (Letter 128)

ANF/WCNF – With each passing year, we see the tremendous value and increasingly rare attributes of wild rivers! These rivers represent an opportunity for the Forest Service to have a lasting impact on the landscapes we will pass on to future generations. As a former citizen and frequent visitor of Utah forests and rivers, I urge you to include all of the eligible rivers in the Uinta Mountains, both Ashley and Wasatch National Forests, as suitable for wild and scenic designation.

I especially urge you to include the rivers, which don't currently enjoy protection from wilderness inclusion. These are:

- Upper, West, East Fork and Middle Whiterocks River (scenic and wild)
- Reader Creek (scenic)
- South Fork Ashley Creek (scenic)
- Black Canyon (wild)
- Ashley Gorge Creek (wild)
- Green River (scenic)
- Carter Creek (scenic)
- Cart Creek (scenic), Boundary Creek (wild)
- The Main Fork Weber River & Middle Fork Weber (scenic and wild). (Letter 147)

ANF – Black Canyon and Ashley Gorge Creek – Ashley Gorge is one of the highest rated waterways in the Ashley (Eligibility). Black Canyon isn't far behind.

It has breathtaking scenery, attracts visitors outside the geographic region who are willing to travel to use it for recreation. Black Canyon is very similar in scenic beauty to the lower portion of Ashley Gorge.

These two segments are important for wildlife. There is a Research Natural Area where Ashley Gorge Creek joins other Creeks.

There are no plans for water projects on either stream. Both canyons are affected by a locally famous "karst" system, which would not likely be suitable for water storage. (Letter 103)

ANF – The remote character of the South Fork Ashley Creek, Black Canyon Creek, and Ashley Gorge Creek (Vernal Ranger District) cannot be over stated. It is undeveloped, wild, and has significant habitat for wildlife. The creek is a splendid fishery in the reaches above the diversion. Water appropriations downstream have reduced Ashley Creek to a dry creek bed, but the stream system above is still a wild running creek. Preserve this character. (Letter 56)

ANF – The Uinta River is a spectacular river, draining a huge glacial basin. The scenery ranges from the tallest mountain in Utah towering over numerous lakes in a high glacial cirque, high alpine meadows above 10,000 feet, and then drops down into a narrow v-shaped canyon with steep slopes and finally opens up into a broader glacial canyon bottom. This river passes through incredible examples of glacial activity, and numerous features are present such as moraines. The river drains some of the most beautiful terrain in all of Utah. The river is incredibly popular for hiking, camping, and fishing. Additionally, the areas through which the river passes provide exceptional wildlife habitat for species such as mountain goat, sheep, deer, elk, and others. (Letter 118, 209)

ANF – With headwaters in the high glacial cirques of Utah's highest mountain, Kings Peak, the Yellowstone River flows unimpeded through some of the most spectacular mountain wilderness in the state. As the river descends it passes through a series of gorgeous waterfalls and cascades. The Yellowstone is also one of the few streams in Utah with a genetically pure strain of Colorado River Cutthroat Trout. (Letter 118, 209)

ANF – Every habitat present in the Ashley National Forest can be found in the Whiterocks. The scenery along the Whiterocks is amazing and diverse. The headwaters begin in a high alpine valley with towering lodgepole and ponderosa pine forest with the mountain peaks overlooking this alpine setting. As the main river and its tributaries make their way down the mountain they pass through a variety of terrain, including open meadows, patches of Engelmann spruce, riparian areas, and sagebrush terraces in the lower floodplains. This intact river system is unique for the area due to its incredible and diverse scenery. The only road into the area is a dirt road that accesses the top of the system at Chepeta Lake. Since this area is outside the Uintas Wilderness Area the road allows adventuresome visitors a means of accessing the incredible and remote roadless areas of the Whiterocks. Other than the one forest road at the top of the system the area is roadless along its entire length, which is extremely unique for this area and provides for a unique recreational experience. (Letter 118, 209)

ANF – The Green River represents an outstanding example of a Utah Wild and Scenic River candidate. This river is one of the defining features of Utah's landscape. One glance at a map of Utah will show that the Green River is Utah's major river, beginning in Wyoming on the eastern slopes of the Wind River Mountains and traveling north to south through Utah for nearly 450 miles to the confluence with the Colorado River. The Green River possesses every single possible ORV that a Wild and Scenic River can have, including fishery, wildlife, scenery, recreation, cultural, historical, and geologic. Anyone that has visited this segment of the Green River will testify to the glory of this river. Surely, it was to protect types of rivers like this that Congress had in mind when they created the National Wild and Scenic River system. (Letter 118, 209, 202)

ANF – The National Outdoor Leadership School's (NOLS) mission is to be the leading source and teacher of wilderness skills and leadership that serve people and the environment. On our river courses we teach kayak, oar raft and paddle raft skills including hydrology, hazard evaluation and rescue techniques. We also teach a full environmental studies and natural history curriculum that delves into river ecology, history and management. The free-flowing nature of the Green River in Utah is essential to the continued success of our river courses.

Since NOLS began floating the Green River in 1988, it has been one of our most extensive and diverse river classrooms. Each year we run courses through the stretch of river that flows for 13 miles through the ANF. NOLS students and instructors can attest to the scenic, geologic, historic, cultural, recreational, and natural values that are apparent on this stretch of river. Crystal clear waters teeming with trout bracketed by crimson canyon walls leave a lasting impression on visitors. These ORVs compel NOLS to support a Scenic classification for this portion of the Green River.

NOLS would like to voice its appreciation to the agency for initiating this study, and for carefully considering the unique attributes of so many rivers across the state of Utah. In our experience, the Green River is Utah's single most outstanding river resource. We encourage the Forest Service to preserve the current "Scenic" classification for the stretch of this river that runs through the ANF. (Letter 116)

ANF – All of the eligible segments (Upper Rock Creek, West Fork Rock Creek, including Fish Creek, Fall Creek, Oweep Creek, Upper Lake Fork River, incl. Ottoson and East Basin Creeks, Upper Yellowstone Creek, include. Mill Creek, Garfield Creek, Upper Uinta River, include. Guilbert Creek, Center Fork, and Painter Draw, Shale Creek and Tribs) within the High Uintas Wilderness (HUW) and immediately adjacent to it meet all of the suitability criteria with ease. Many of these segments after leaving the wilderness are within roadless areas contiguous to the HUW and if not are adjacent to roadless areas contiguous to HUW and associated with trailheads part and parcel with the wilderness landscape and experience. Because of their eligibility characteristics, ease with meeting suitability requirements, and ecological nexus to a wilderness environment/landscape, rather than isolated rivers, these river segments are profoundly meaningful as additions to the NW&SRS.

It is particularly important to note that river segments largely harbored within ANF roadless area (Upper Whiterocks River, West Fork Whiterocks River, Reader Creek, East Fork Whiterocks River, Middle Whiterocks River, South Fork Ashley Creek, Black Canyon, Ashley Gorge Creek, Cart Creek Proper, Pipe Creek, Carter Creek, and Green River) meet, with ease, all of the suitability criteria.

The Upper, West, East, Middle Fork Whiterocks River and Reader Creeks are all part and parcel of one another making for an ecological system of connected river segments rather than isolated rivers. This adds to the ecological and primitive recreational values of these segments particularly since they are largely harbored within the South Slope High Country Roadless Area. The South Fork Ashley starts on the other side of the Whiterocks drainage and courses for a wild 15 mi. through the same roadless area adding to the value of the river segment as it is part of a broad road and exceptionally wild region. None of these rivers harbor any resource conflicts that delimit their suitability and eligibility and river values have been documented. Ashley Gorge and Black Canyon, meet all the suitability criteria with ease and harbor not the slightest suitability conflict. Ashley Gorge Roadless area is primarily defined by the stunning Ashley Gorge Canyon and the course of Black Canyon as it starts high in subalpine meadows and descends also through a deep and isolated canyon. Both areas are crucial wildlife habitat and unique as they represent mid elevation forest ecosystems unroaded and harvested, a rarity on the South Slope of the Uintas. None of these rivers harbor any resource conflicts that delimit their suitability and eligibility and river values have been documented. Cart Creek and Pipe Creek are unique and harbored on the Mt. Lena Roadless are. Pipe Creek runs through a steep canyon of willows and alder, sagebrush slopes and steep exposed “Red rock” slopes and ponderosa, Doug-fir, and lodgepole forests—all low to middle elevation forests—unroaded and unharvested—rare on the ANF.

Cart Creek is a remarkable river in a deep canyon, densely forested, with its headwaters in a meadow ecosystem. Found in a mid-elevation environment, unroaded and unharvested.

Carter Creek is an inaccessible river running through the Roadshed Roadless Area starting in meadow and dipping into a wild canyon with deciduous understory, beaver dams, and mid-elevation, old growth lodgepole, unroaded and unharvested—the last of its type. Exceptionally important wildlife habitat. None of these rivers harbor any resource conflicts that delimit their suitability and eligibility and river values have been documented.

The Green River is the penultimate wild river. It pounds through Red Canyon (Little Hole and Bare Top Roadless Areas) and starts its long winding course through Labyrinth and Desolation Canyons to the confluence with the Colorado River making a world-known and world-class stretch of undeveloped wild river. (Letter 80)

ANF – I believe that the sections of the Green River below Flaming Gorge Dam are worthy of protection. The upper Green is beautiful, and used for recreation, wonderful boating and excellent fishing. It provides fish flow for endangered fish (such as the humpback chub and the Colorado pikeminnow), as well as the incredibly important riparian area spanning the entire state of Utah and many federal lands, providing a home to most of the wildlife that exists in the state. Parts of the Green that are below the section under consideration house endemic species (in Dinosaur National Monument) of birds and bats, which rely on this water source. I believe that protection as a Wild segment is important to the specific area and the downstream resources as well. I believe that protection for the upper Green should come through flow management to preserve fish species, vegetation management to restrict the migration of tamarisk and Russian olive, and restriction of water removal from the river corridor. I think that water development in this section is ill-advised due to the plethora of species and ecosystem values, not to mention economic values such as recreation and tourism that would be diminished. I am sure that tourism companies in the area would be very willing to work with the Forest Service to protect this section. (Letter 75)

DNF – Death Hollow Creek, located in south – central Utah passes through the Box Death Hollow Wilderness area and then flows into the Grand Staircase Escalante National Monument. The Box Death Hollow Wilderness is a rugged, remote area. Death Hollow Creek is located just east of the area known as the Box and is located in a gently dipping monocline. This creek is unique in the State of Utah due to its remote and rugged nature as it passes through the amazing red rock worlds of Southern Utah. As one visitor states, “Death Hollow is one of the great canyons of the Colorado Plateau. The healthy riparian zone has lush vegetation growing right down to the waterline, without cut banks, erosion or grazing damage. A rare experience in the modern Southwest!”(Letter 118, 209)

DNF – Death Hollow Creek - We urge Wild River status. The complex of wild lands from Boulder Mountain south to the Escalante is one of the finest wild complexes in Utah. Wild River status for Death Hollow Creek would help protect the values of this watershed all the way from Boulder Mountain down through the Box-Death Hollow Wilderness and into the adjoining Grand Staircase-Escalante National Monument. Here again, the tourism industry is already growing, and Death Hollow will receive more attention and more visitors in the decades ahead. (Letter 99)

DNF – *Scenic and Recreational* The scenery along Death Hollow Creek is fabulous. One visitor describes it as, "...a deep, wild, and watery canyon with scenery that is often spectacular." The area is rugged and spectacular with a variety of features. This area is a haven for adventurous hikers and backpackers. The creek starts in a shallow valley then steadily deepens as it winds its way down and has lengthy narrows sections. (Letter 209)

FNF – Corn Creek – Corn Creek deserves protection because of its fishery and recreational values. Corn Creek is a well-known angling destination in a part of the state with limited fly fishing opportunities. I found Corn Creek an outstanding fishing experience. Corn is easily accessed from the Forest Service road, and an angler can hike along the stream on a well-traveled trail. The proximity of the very nice Adelaide Campground makes access even easier, adding to the recreational experience. In addition, this stream is valuable because it can be fished earlier in the season than many streams on the Fishlake (or the northern Forests for that matter).

Corn Creek supports good habitat – both in-stream and riparian. Corn Creek has a healthy mix of pool, riffles, and runs with large woody debris and other cover for fish. The riparian corridor is healthy, with a mix of willows, native grasses, and other vegetation. Especially for a creek as accessible and well-used as this, Corn Creek is a good example of habitat management.

Designating Corn Creek as Wild and Scenic does not conflict with any other management plans in the area. In addition, the designation can only help the local economy by attracting more anglers and hikers to the area to enjoy this little known gem. I request that the Forest Service find Corn Creek suitable for designation. (Letter 210)

MLSNF – *Ecological* The riparian habitat that make Fish Creek so unique is composed of extensive tracts of willows and cottonwoods with a variety of species and age-classes, including *Salix boothii*, *S. drummondiana*, *S. lasiandra*, and *S. exigua*. The current flow regime in this system has contributed to the development and maintenance of the willow complex that forms the underpinning of the outstanding remarkable value for wildlife. In a state where no river or creek has remains unaltered by some sort of dam or diversion, it is rare to find a waterway that supports a healthy, robust, and diverse willow/cottonwood wetland system. The Gooseberry and Fish creek basin supports soils that are listed as Cryoaqualls. Cryoaqualls are classified as histic, which means that they contain a high amount of organic matter. Such soils increase the potential of riparian wetlands to provide nutrient transformation, biodiversity and uniqueness/heritage functions. (Letter 209)

MLSNF – Fish and Gooseberry Creek, on the cusp of the Colorado Plateau adjacent to the Wasatch Plateau, are a truly unique river system and one of the only eligible rivers located in central Utah. Most rivers in central Utah have already been developed to provide water for irrigation or municipal purposes. Furthermore, these unique creeks are also threatened by a water development project that would irreparably harm the values of these rivers. These rivers are unique for their incredible riparian habitat, fish and wildlife values, and importance in maintaining water quality for Scofield Reservoir, located just downstream. The riparian habitat along these streams is incredibly healthy and supports a unique population of birds and wildlife, including the largest breeding population of Willow Flycatchers in the State of Utah. The uniqueness of the area has led the trail that parallels the creeks to be named a National Recreation Trail. Others value these creeks because they have religious ties, they spent significant time on them as children, or because they provide irrigation flows to farms and ranches that have been in the family for generations. The Carbon County community has significant cultural ties to these two creeks that make them invaluable as

cultural and historical resources. As Utah's urban areas grow and expand into formerly rural areas, the importance of headwater creeks such as Fish and Gooseberry Creeks only increases. It is important to provide places for people to observe unique wildlife, solitude, healthy air and clean water. Fish and Gooseberry Creeks provide such a resource as evidenced by the abundant fish and wildlife that use this corridor and the number of people who recreate here (Letter 209)

MLSNF – I recently learned Hammond Creek was dropped from eligibility. I cannot imagine why it would not qualify for wild, let alone scenic designation.

The lower section is open with huge sagebrushes, and cottonwoods. There are remains of an ancient farm, with fences and rusting farm equipment from another era, presumably the legacy of some Mormon pioneer. Above the narrow rocky defile, the middle section of the canyon opens in an expanse of classic sculpted redrock, with climax ponderosa forest between the spires. There is also a remarkably well preserved Anasazi site, with a substantially intact kiva.

The geology of Elk Ridge is an impressive demonstration of the ecological possibilities of redrock with abundant water.

It appears the stream is perennial, maintained year round by groundwater runoff, at least through the redrock section. It is free flowing.

Hammond Canyon is clearly worthy of protection for its high wilderness, scenic, geologic, historical, and cultural values. (Letter 93)

MLSNF – In May 2007, CWA staff visited Hammond Canyon in the Abajos Mountains in the MLSNF and hiked along that portion of the Canyon. During that visit, staff observed that the Creek was running full at about 150 cfs and was clearly a perennial stream. In addition, while the stream exhibited some livestock use, for the most part, it was deep and cool and contained adequate riparian vegetation. Staff also noticed numerous deep pools suitable for aquatic species habitat. It is clear that Hammond Creek deserves to remain on the Wild and Scenic River classification and the agency should not drop it from the inventory list as currently recommended by the Forest Service. (Letter 108)

MLSNF – Hammond Canyon stands out as an exceptional river in southeastern Utah and is more than regionally significant. The scenery of the canyon is absolutely spectacular, ranging from red rock worlds, to ponderosa pine communities at the higher elevations. The scenery is remarkable, with waterfalls, sandstone cliffs and spires, and deep gorges. In addition to the incredible scenic values of the canyon the known cultural values are exceptional. The canyon has not been thoroughly explored for cultural sites, so a very high potential exists for other incredible cultural values. (Letter 118, 209)

MLSNF – Hammond – I have done several backpacking trips into Hammond Canyon over the last five years, and feel strongly that Hammond deserves a suitability recommendation based on its outstanding values for cultural sites, scenery, geology, and recreation. Hammond provides an outstanding opportunity to view cultural sites in a remote setting. The sites are, in my experience hiking in Utah and elsewhere, unique and particularly well preserved. In addition, the riparian area supports Mexican spotted owls and attracts wildlife due to the arid nature of the area. All of the values of Hammond are clearly river-related, from the drama of the scenery and geology to the locations of the cultural sites.

I request a positive suitability finding for Hammond Canyon. There is no development in the area, and no conflict with existing management. (Letter 210)

MLSNF – Southern Utah is a very harsh, desert environment. As such many rivers in southern Utah are either intermittent or ephemeral. Therefore, Hammond Canyon and Dark Canyon with its intermittent flows is incredibly important for the entire area. The water that flows is vital for the survival of the vegetation and the local wildlife. Evidence of the importance of the water in the river is the presence of numerous cultural sites in the Canyon, demonstrating the importance of the river to older communities. These older communities could have lived anywhere, but they chose to live near the river for its important life sustaining

water. Thus, Hammond Canyon plays a crucial role in the ecology of the entire area and is a major tributary of Cottonwood wash. (Letter 118, 209)

...Thus, Dark Canyon plays a crucial role in the ecology of the entire area and are important tributaries of the Colorado River. (Letter 209)

MLSNF – CCHA urges the Forest Service to look closely into safeguarding the rivers, many of which flow from the Abajo Mountains in the Manti-La Sal National Forest here in San Juan County, on into Canyonlands or the Cedar Mesa area. These locales are rich in archaeological sites, and home to a host of flora and fauna desperately in need of protection. Your wise decision-making concerning the river corridors mentioned below could ensure these areas remain a treasure for all of our future generations.

Dark Canyon - this Wilderness Area is truly spectacular, an area unlike any other. Inclusion of this river for protection under the Wild and Recreational category would complete the wilderness experience.

Hammond Canyon - another area that has become increasingly popular is the Hammond Canyon area in our County, and the number of visitors into this canyon increases monthly. In order to assist in protection of this fragile area, we recommend inclusion under the Scenic River Status. (Letter 203)

MLSNF – Abajo Mountains section: Dark Canyon - This canyon traverses a BLM primitive area and a Forest Service wilderness area. We favor Wild and Recreational status for this river. (Letter 99)

MLSNF – Dark Canyon river segments lie at the heart of the Dark Canyon Wilderness area and are responsible for carving the amazing canyons in this region of the country. All of these canyons possess absolutely incredible scenic and geologic values. Additionally, the cultural values of these areas further cause these rivers to rise to the top of the list. These rivers are truly representative of a unique river system in this arid part of the country. (Letter 118, 209)

MLSNF – The rivers flowing from the Abajo Range in Manti-La Sal National Forest deserve protection as part of this wild region that links Canyonlands National Park with Cedar Mesa to the south. We urge consideration for WSR status of Dark Canyon (Wild and Recreational category) and Hammond Canyon (Scenic). (Letter 102)

MLSNF – Given the ever increasing demand for water, I can't think of anything more important for all of us to protect than our rivers and riparian areas. Every state and county in this nation should adopt local waterways that they should protect, for the present and future viability of all living nearby, as well as those who may choose to visit because of the beauty of the protected areas. Those of us in Utah should be no exception.

I am not personally familiar with all the places being considered in the Manti-La Sal National Forest region. Those that I am familiar with and which I would support W&S status are Mill Creek Gorge, Fish and Gooseberry Creek, Allen Canyon, and Upper and Lower Dark Canyons. Certainly, we can do our part to protect many of these beautiful places in our region. (Letter 251)

WCNF – Henry's Fork is one of the gems in the Uinta Mountains, originating amid breathtaking views of Gilbert Peak and King's Peak. The river descends through a pristine alpine canyon covered with lodgepole pine and grassy meadows. This river may sound like many of the other rivers in the Uintas, but Henry's Fork possesses practically the entire range of values that a Wild and Scenic River can. This is an area where the scenery, wildlife, and ecology all come together in a mountain setting to create one of those special places. This has led the area to become well known as a hiking destination, especially for those looking to summit the highest peak in Utah. The Henry's Fork Basin receives about 5,000 visitors annually. Due to its magnificent scenery, wildlife, ecology, and recreational experience among other values the Henry's Fork is one of the most outstanding rivers in the State of Utah and deserves to become a Wild and Scenic River. (Letter 118, 209)

WCNF – The Bear River begins its long journey to the Great Salt Lake in the High Uintas Wilderness Area where it has several tributaries including Stillwater Fork, Ostler Fork, Hayden Fork, and the East Fork of the Bear River. These headwaters areas are gorgeous, providing excellent fishing, hiking, camping, and provide crucial wildlife habitat. The Bear River is the largest tributary of the Great Salt Lake, providing 60 percent of its annual inflow and it all starts in these headwaters in the Uinta Mountains. (Letter 209, 118)

WCNF – Designate Provo River Trial Lake to U35 Bridge for scenic gorge and rapids/falls. Designate Little Cottonwood Creek source to Murray diversion for geology and scenery, in light of development pressure and large amounts of recreational traffic. (Letter 23)

WCNF – Hayden Fork of the Bear River, Evanston Ranger District – I hope the entire length of this Fork of the Bear River gets preserved as a Scenic River because of its wildlife and scenery, as well as its fishing, hiking, and kayaking (Class II to III) river opportunities. (Letter 86)

WCNF – Designate the Logan River: Because the steadily increasing population indicates that Utah is no longer a state of inexhaustible wild places. (Letter 85)

WCNF – We support a positive suitability finding for the following rivers:

- Logan River (scenic and recreational) and tributaries including; White Pine Creek (wild); Bunchgrass Creek (wild); Spawn Creek (wild); Little Bear Creek (scenic); and Beaver Creek (recreational).
- High Creek (wild) to the wilderness boundary and (recreational) to the National Forest Boundary.
- Headwaters of the Bear River; Hayden Fork; Stillwater Fork; Ostler Fork; and East, Left, Righthand Forks of East Fork of Bear River

Uniqueness of River System – This river system is extremely unique and stands out among the best of the best in Utah. The upper Logan River and its tributaries are one of the last intact river systems in Utah that are unregulated by dams. As the river runs south from the Idaho border to the mouth of Logan Canyon it passes through remarkable and National Park like terrain. Narrow gorges of limestone escarpments to wide open sub-alpine meadows the river system passes through a diverse landscape embraced by thousands of visitors. (Letter 112)

WCNF – Logan Canyon has incredible limestone canyon walls in the lower canyon, opening up to big vistas of snow capped peaks to the west in the upper canyon. These incredible views are even more spectacular while fly-fishing the incredible fishery found in this river. The Logan River also offers whitewater padding runs for beginners and experts alike with nearly 20 miles of continuous rapids and spectacular scenery. Hiking one of the side drainages whether to fish or simply enjoy the scenery, one immediately realizes the fortunate proximity of this pristine Logan river drainage to the town of Logan.

We are writing this letter to express our support for the wild and scenic designation for the Logan River system including its tributaries - Beaver Creek, Spawn Creek, Temple Fork Creek, White Pine Creek, Bunchgrass Creek, and Little Bear Creek. The watershed runs through an unusual variety of terrain for which Logan canyon was designated a scenic byway. The Logan River deserves to be designated wild and scenic for a variety of reasons varying from being one of the few remaining strongholds of the Bonneville Cutthroat Trout (BCT) in the mainstem and its tributaries, to the incredible recreation opportunities it provides such as kayaking and hiking. In the winter the Bunchgrass drainage is a non-motorized recreation area that provides exceptional terrain for skiers and snowshoers. Nordic United has been actively involved in trying to obtain the same protection for the White Pine Creek drainage.

...In a desert state like Utah, these streams play an ever increasing role in the future of the state. Preserving these watersheds so that these clean water sources are available for future generations should be of utmost importance as the population in the state grows and demand for water increases. The Logan River and its tributaries satisfy the criteria for wild and scenic classification for which NU endorses. (Letter 114)

WCNF – The Logan River must be protected as a “Wild and Scenic” river. The river segments include the Logan River from the Idaho state line to the confluence with Beaver Creek (6.6 miles) and the confluence of the Logan River with Beaver Creek to Third Dam (20 miles).

Unique characteristics of the Logan River and Logan Canyon – Two threatened species exist in Logan Canyon: the Bonneville cutthroat trout and the Maguire primrose. Budy et al. described how the Logan River provides unique Bonneville cutthroat trout habitat because a large portion of the river remains free flowing. This endemic species is threatened due to “habitat degradation and fragmentation due to water diversions, overgrazing, and impoundments.” It also states “Logan River contains one of the largest remaining populations of Bonneville cutthroat trout; the densities observed here are some of the highest reported densities of inland stream-type cutthroat trout. Survival and growth rates were also relatively high. These are all components of population persistence. Clearly, the remaining continuity and connectedness of habitat fragments in the Logan River and large size have contributed to the persistence of this population...we recommend that protective management measures be considered, such as exotic brown trout removal and habitat restoration and protection.”

Only 3000 individual Maguire primrose plants remain in Logan Canyon (Center for Plant Conservation). This endemic plant survives in a 19km stretch along the Logan River. It is sensitive to “water development, road construction, rock climbing, and amateur horticulture collecting.” Studies to understand the Maguire primrose population genetic structure are ongoing and may help manage this rare plant (Wolf et al, 1997). (Letter 115, 199)

If we are not kayaking the river, we are walking our dog along its banks. I visit the Logan River at least once a week as a water quality educator. My hope is to teach my children the value of stewardship on the banks of the Logan River. This river gives me solace when I need it and has become very special to me, and now I feel honored to be returning the favor it by advocating for the Wild and Scenic designation. (Letter 115)

WCNF – I have lived in Logan for 14 years, and the Logan River is a large part of my reason for staying in Cache Valley. As an avid kayaker and fisherman, the Logan River above Third Dam provides outstanding stretches for both of these activities. In this arid environment, these natural places where people can relax and recreate in the cool waters are special places that deserve recognition and protection. The riparian habitat that these areas provide are also critical for wildlife in our arid environment. I strongly support the Wild and Scenic designation for the Logan River and its tributaries. (Letter 234)

WCNF – I'd support positive suitability findings for the headwaters of the Bear River. I have been photographically documenting the Bear River for the past six years. That effort will culminate in a book. I think I can speak from experience and knowledge when I say that the Bear River headwaters deserves this kind of recognition and protection. In fact, it was promoted earlier as being Utah's best exemplar of Wild and Scenic status. Given population pressures...Utahans now realize that if we don't protect our last vestiges of wildness, it will be too late. No amount of development can replace what we will have lost. The Bear River headwaters are the jewel that supports a rich, diverse ecosystem and a river system that is both ancient and relatively newborn. That should be protected. (Letter 121)

WCNF – Boundary Creek, Middle Fork of the Weber River, and Main Fork of the Weber River – are the scenic and biological heart of natural areas.

Boundary Creek is a refuge with some cutthroat trout and a yurt for skiers. Geologically, it is more connected to the East Fork drainage than the Stillwater.

The Weber segments are the core of the north portion of the Lakes Roadless Area. The Main Fork begins near one of the most popular trailheads in the Uintas, and the middle Fork cuts a more challenging path into less visited terrain. The view is stunning. (Letter 103)

WCNF – All of the eligible river segments (Henry's Fork, West Fork Beaver Creek, Middle Fork Beaver Creek, Thompson Creek, West Fork Blacks Fork, East Fork Blacks Fork, Little East Fork, West Fork Smiths Fork, East Fork Smiths Fork, Hayden Fork, Stillwater Fork, Ostler Fork, and Left, Right, and East Forks Bear River) within the High Uintas Wilderness (HUW) and immediately adjacent to it meet all of the

suitability criteria with ease. Many of these segments after leaving the wilderness are within roadless areas contiguous to the HUW and if not are adjacent to roadless areas contiguous to HUW and associated with trailheads part and parcel with the wilderness landscape and experience. Because of their eligibility characteristics, ease with meeting suitability requirements and ecological nexus to single wilderness environment/landscape, rather than isolated rivers, these river segments, an impressive 126 miles, are exceptionally meaningful as additions to the National Wild and Scenic River System (NW&SRS). On the other hand, because they are associated with a designated wilderness and the landscapes immediately adjacent to the HUW they have a degree of protection already inherent in the context of the HUW. The portions outside of the designated wilderness do not have that clear status of protection—and the rivers are single units—suggesting the better alternative is to assure they are found suitable and protected under the NW&SRS).

It is particularly important to note that river segments largely harbored within W-C NF roadless areas (Boundary Creek, Main Fork Weber River, Middle Fork Weber River) meet, with ease, all of the suitability criteria. The Main and Middle Forks of the Weber River are the core of the USFS proposed Lakes Wilderness Area. Again, rather than isolated segments they are part and parcel of the proposed wilderness. Both river corridors are productive wildlife corridors with dense forests of lodgepole, spruce, and aspen, willows and dotted with small meadows and steep rock outcrops. Both areas represent the last few mid elevation forested streams that are not accessed by motors, diverted or damned in any way and are important native trout fisheries, lightly fished and receiving very light recreational use. Grazing is minimal or nonexistent.

Boundary Creek represents an important ecological reserve in that the area receives very limited recreational use, is entirely within a roadless environment adjacent to the HUW, an important native fisheries, representative of an old growth forest(s) and ungrazed for decades. The stream runs entirely in dense forest stands and with no notable meadows or openings, yet at a moderate grade. A vital home to goshawk, pine martin, and black bear because of dense and old forests. It is a very unusual stream on the North Slope of the Uintas because of dense continuous forests, light recreational use and mid elevation. None of these rivers harbor any resource conflicts that delimit their suitability and eligibility and river values have been documented. (Letter 80)

MULTIPLE – My husband has fished/hiked the Upper Uinta, the Upper Yellowstone and Henrys Fork. We have camped with our son on the Green River at the Split Rock campground, one of the most wonderful experiences I have had enjoying this beautiful river. I'll never forget the wild geese that flew just a few feet above the water at dusk.

...Protection of these rivers is also a way of creating a savings bank of experiences and possibilities for enjoying and being enriched by these rivers for our children, our grandchildren, and all future generations. Even though I do not spend a great deal of time exploring these places, I recognize that they are of tremendous value that transcends their worth as commercial properties or as scenery. Experiencing the wild parts of the world enriches us, and we are in turn able to enrich others. (Letter 120)

MULTIPLE – Protect all segments in the High Uinta Wilderness, Rock Creek, Fish Creek, West Fork Black Fork, Upper Yellowstone Creek, Upper Lake Fork, Beaver Creek (above Kamas), Red Butte Creek – in the Gorge, Green River (Flaming Gorge to Browns Park), Fifth Water Creek to Hot Springs, Huntington Creek including Left Fork, Fish Creek, Death Hollow Creek, Moody Wash. Maintain Roadless and ATV/ORV free zones. All segments that qualify in wilderness should be protected. Maintain native fish populations. Red Butte in S.L. County above the dam is unique near a city of 15 million. (Letter 26)

MULTIPLE – Designate Little cottonwood Creek in Little Cottonwood Canyon and down below the mouth of the canyon where it is diverted near Wasatch Blvd. and Little Cottonwood Road. Because – recreation and refuge; there are birds, butterflies, insects, mammals; and for environmental education. It provides city drinking water, beauty, wildlife habitat and opportunity for community awareness and involvement in land/river stewardship. Other rivers to protect are: the Green River, Bear River, Ashley Creek, Dry Fork

Creek, Uintah River, Sevier River, Colorado River, Daniels Creek, City Creek, Jordan River, and Big Cottonwood Creek. (Letter 28)

MULTIPLE – Designate the Forest Service’s outstanding rivers, including: Green River, Henry’s Fork, Logan River system, Whiterocks River system, Upper Uinta River system, Fish and Gooseberry Creeks, Headwaters of the Bear River, North Fork of the Virgin River, Upper Yellowstone River system, the Provo River, and Huntington Creek and Lower Left Fork of Huntington Creek. (Letter 30 to 49; 172 to 198)

Because they are beautiful. (Letter 40)

Because there is a lot of great history on the Green River. (Letter 43)

Because they make the world more peaceful. (Letter 44)

Because they are essential for habitat and the human spirit. (Letter 49)

Save them and let’s protect some more! Escalante, San Juan, Price. (Letter 173)

Protect our heritage! (Letter 176)

Leave them wild for our great grandchildren. (Letter 180)

Protect the cutthroat. (Letter 185)

It is key to our state. (Letter 195)

MULTIPLE – We are in favor of a positive suitability finding for all the qualifying rivers, and we want to be recorded especially as favoring these rivers:

Logan River - I have vacationed along the mainstem from Logan up to the headwaters, plus Temple Fork and Right Hand Fork, where I worked on rangeland research projects. The Logan River system deserves the highest protection available under the Wild & Scenic Rivers Act.

We also favor WSR protection for the following rivers as recommended by Utah citizens' groups:

Headwaters of the Bear River, Upper Uinta River, Upper Yellowstone River, North Fork of the Virgin River, "outstanding" segments of the Provo River, Henry's Fork, Whiterocks River, Fish and Gooseberry Creek, Huntington Creek, Butts, Arch, and Texas Canyons, Hammond Canyon, Dark Canyon, Moody Wash, Manning Creek, and Death Hollow Creek.

We favor a "suitable" finding for all the above rivers. We believe they all have the qualities necessary under the WSR Act for inclusion in the National Wild and Scenic Rivers System. WSR status will help protect the existing character of these rivers so it will be available for future generations of Utahans and visitors to Utah. Utah derives huge economic value from river-related tourism, so WSR status would support Utah's future economic health, while also protecting nationally valuable rivers for public use. (Letter 226)

MULTIPLE – I suggest the following rivers: Green River Logan River System Bear River Upper Uinta River Upper Yellowstone River, including: Upper Yellowstone Garfield Creek North Fork of the Virgin River Provo River Henry's Fork, Whiterocks River Fish and Gooseberry Creek Huntington Creek Butts, Arch, and Texas Canyons Hammond Canyon Dark Canyon Moody Wash Manning Creek Death Hollow Creek

I support finding all of these rivers suitable for Wild and Scenic River status. Protecting these waterways will protect the things that make Utah the incredible place it is - the beautiful wilderness. (Letter 227)

MULTIPLE – Please protect the outstandingly remarkable values of our Utah rivers by designating them as wild and scenic! I am a river rafter, and I am particularly interesting in protecting the Green river, the Weber River, the Bear River, and Slickrock Canyon. I would also like to see the Fish and Gooseberry creeks protected, as they are particularly beautiful. (Letter 235)

MULTIPLE – I think too many of us take for granted that the still remaining wild river segments in this state will always remain so. This is a dangerous attitude to take. I greatly appreciate the protections offered by the Wild and Scenic Rivers program and because I have personal experience with the following river segments I would encourage their protection: Green River (scenic), all of the studied Logan River and tributaries (scenic, recreational and wild), North Fork of the Virgin River (wild), Henry's Fork. (wild), Dark

Canyon (wild and recreational) and Death Hollow Creek (wild). I believe them to all be suitable to be designated as part of the Wild and Scenic Rivers System. (Letter 230)

SF 117a – (17) Birds, wildlife, fish, aquatic species.

The rivers in National Forest in Utah support riparian habitat that is crucial for wildlife. These riparian zones serve as migration corridors for migrant species passing through the canyon country and as the summer home of many species that nest here. Our members have visited many riparian areas on Utah rivers, finding a remarkable diversity of birds there, from Beaver Dam Wash in southwest Utah to the Logan River in northern Utah. We urge the Forest Service to identify the wildlife habitat values of each river segment in the study, and analyze how WSR status would help protect those values in the years ahead.

Bird distribution information may be lacking for many of the candidate rivers. We encourage the Forest Service to seek available data from nearby areas such as national parks and national wildlife refuges to draw tentative conclusions about birds on these rivers.

Rivers and their riparian zones are jeopardized by activities that would degrade their value as wildlife habitat. Our members have seen how unregulated off-road vehicles on BLM public lands in southern Utah have been allowed to destroy riparian vegetation and pollute the water. WSR status should help to avert such damage in the future. (Letter 102)

Beneficial/adverse impacts to TES and MIS species and their habitats, with a focus on aquatic and riparian dependant species and habitats should be analyzed in detail in this EIS. Many protected eagles, raptors, and migratory bird species are directly and indirectly dependent upon conditions, habitats, and prey availability in aquatic and riparian zones. Impacts to these species will also need to be analyzed in detail. (Letter 166)

All eligible river segments, the eligibility of which derives from their wild character or their outstandingly remarkable value for wildlife, be identified as suitable for inclusion within the Wild and Scenic River System. Wildlife habitat is being continually degraded throughout the state and we must therefore protect and maintain in healthy condition as much that remains as we can. (Letter 155)

ANF/WCNF – Designate rivers in the Wasatch-Cache and Ashley National Forest to protect wildlife and habitat. (Letter 4)

ANF – Fish value Reader Creek has habitat for Colorado River Cutthroat Trout. This Creek serves as the epicenter for Colorado River Cutthroat Trout reintroduction. Due to the presence of the Colorado River Cutthroat Trout in Reader Creek, a tributary of the Whiterocks River, the entire Whiterocks River is managed to protect the native cutthroat trout. (Letter 209)

ANF – Reader Creek, Upper Whiterocks River, Middle Whiterocks River, and East Fork Whiterocks River – Reader Creek, East Fork Whiterocks River, and Whiterocks River are located in the “bollies” region of the High Uintas. Whiterocks, Reader Creek is among the highest rated watercourses in the Ashley. It has Colorado cutthroat trout. Reader Creek is the “epicenter for Colorado River cutthroat reintroduction” and “essential for genetic interaction.” (Letter 103)

ANF – Uinta River – Fish and Wildlife - The river and tributaries are home to a highly diverse wildlife community. Mammal species include bighorn sheep, black bear, moose, elk, mule deer, mountain goat, river otter, beaver, muskrat, pine martin, and mink. Bird species include many migratory birds, golden eagle, goshawk, bald eagle (winter), sage grouse, and ptarmigan. Fish species include mountain whitefish; mountain sucker; speckled dace; long nosed dace; and brook, brown, cutthroat and rainbow trout. The river hosts self-sustaining populations of three native trout species. (Letter 209)

ANF – Yellowstone River – *Fish and Wildlife* The Utah Division of Wildlife Resources lists the Yellowstone River as one of the few streams in Utah with a genetically pure, native strain of Colorado River Cutthroat Trout. The Basin is also home to bear, mountain goats, and many other wildlife species. (Letter 209)

Scenic - The Yellowstone's headwaters collect from the jagged alpine cirques along the crest of the Uinta Mountains. The river then descends through one of the most picturesque basins in the Uintas. Small waterfalls and cascades abound – often following one after another like a staircase. Beaver dams form deep pools throughout the canyons. Wildflowers and lush riparian areas stretch along the length of the waterways. (Letter 209)

ANF – Green River - *Fish and Wildlife* – This section of river is one of 15 designated a Blue Ribbon fishery and supports incredible trout fishing. Several endangered species exist on the Green River. While they may be present in the segment under consideration all of the species rely on minimum flows in the river. (Letter 209, 202)

DNF – Moody Wash is the only river on National Forest land in this region of the State of Utah that is eligible as a Wild and Scenic River. The ecological values of Moody Wash, an intermittent stream in portions, are truly unique and noteworthy. The segment of Moody Wash on the Forest is unique due to its potential habitat for Virgin spinedace and for flannelmouth sucker, another conservation agreement species. Moody Wash has served as a source population for Virgin spinedace restoration efforts in the region, which demonstrates the high quality population located in the stream. (Letter 118, 209)

DNF – *Fish & Ecology* – This stretch of river possesses potential habitat for Virgin spinedace The Virgin spinedace is a very important species. It is not a listed species only because there is a conservation agreement about the management and restoration of it. Moody Wash is unique in the area with respect to the density of Virgin spinedace. A 1993 report lists the density of Virgin spinedace in Moody Wash at 27.9 per every 10 meters and 143.1 per every 100 meters. This is the highest density of Virgin spinedace for every river included in the Conservation Agreement, which includes the Virgin River, North Creek, and others. The same report states that Moody Wash has 7 miles of historical and current habitat for Virgin spinedace. In addition to its fish values, the ecological value of Moody Wash truly stands out. In Moody Wash is the presence of and habitat for both canyon tree frogs and Arizona toads, which is a state species of concern. (Letter 209)

DNF – I believe that Moody Wash is highly eligible for suitability evaluation. ...As you may know, Moody Wash has excellent riparian habitat quality and a healthy diversity of species. While the portion of Moody Wash to the immediate south of the Forest Service boundary, between the confluence with Magotsu Creek and the Santa Clara River, may be more important for special status fish species, this does not diminish the importance of the upstream Forest Service portion to the health of these downstream fish. It is well-documented in the scientific literature that the health of headwater or upstream segments is critical to the health of connected downstream segments. In addition, even the Forest Service segment provides potential habitat for these special status fish species.

The Forest Service portion of Moody Wash is significant, comprising 8.5 miles of its entire 13 miles. Thus, future Forest Service management will play a significant role in maintaining the health of Moody Wash and its dependent aquatic and riparian species. Moreover, Moody Wash will play a significant role in maintaining the health of the regional populations of these rare or unique fish species, including Virgin spinedace, desert sucker, and speckled dace. Indeed, I understand that Moody Wash is considered to be a source population for restoration of the Virgin spinedace.

Moody Wash also supports an “outstandingly remarkable” abundance of these fish species. For example, a 1993 report indicates that the density of Virgin spinedace in Moody Wash was 27.9 per every 10 meters and 143.1 per every 100 meters. This is reportedly the highest density of Virgin spinedace for every river included in the Conservation Agreement, including the Virgin River and North Creek.

Besides outstanding fisheries values, Moody Wash also has important ecological and historical values. It supports canyon tree frogs and Arizona toads, the latter being a state species of concern. (Letter 162)

FNF – Manning Creek's population of Bonneville Cutthroat Trout (BVCT) is of special interest on the FNF and in the region due to its abundance and health of the population. Manning Creek has the longest section of stream on the entire Forest with BVCT at nearly 11 miles. Manning Creek is one of only a handful of streams in the entire State upon which the State of Utah Division of Wildlife Resources holds an instream flow right. This is a very rare and unique feature that is only done due to the exceptional population of BVCT that reside in Manning Creek. (Letter 118, 209)

FNF – *Fish* Manning Creek is an especially productive BVCT stream – in monitored or inventoried streams on the forest between 1986 and 2002, Manning Creek had the highest average number of BVCT per mile at 692 fish per mile. Manning Creek has the second highest biomass (lbs per acre) of cutthroat of monitored streams in 2001-2002 with 61.6 lbs per acre. Manning was second in biomass only to one of its tributaries, Vale Creek, at 74.9 lbs per acre. An additional attribute that Manning Creek possesses is natural reproduction. Manning Creek has a self sustaining population of Bonneville Cutthroat trout. Specifically, it is a conservation population, which means that this population of BVCT in Manning Creek represent a pure strain of BVCT and is absolutely vital for the preservation of the species. (Letter 209)

Wildlife value Manning Creek also has an outstandingly remarkable wildlife value, as evidenced by the great habitat for deer and elk. The Monroe Mountain area (where Manning Creek is located) is one of the prime areas for elk in the entire state of Utah. In addition, Manning Creek has a healthy population of arboreal toads, a species of concern that have been monitored for 13 years. (Letter 209)

MLSNF – The Mexican spotted owl lives in the canyons around the Abajo Mountains and Elk Ridge. This is the largest population of Mexican spotted owls on any National Forest in Utah. The Mexican spotted owl is increasing recognized as a riparian species (personal communication with Peter Stacey, MSO researcher). (Letter 70, 117)

MLSNF – Fish and Gooseberry Creeks – The wildlife and ecological values of the Creeks are truly outstanding. Fish Creek is home to the largest population of Willow Flycatchers in the state, and over 54 other bird species have been observed in the basins. Beaver, elk and other mammal species abound. Preserving the Creeks will provide high quality aquatic habitat, a key piece of system of integrity. Protection would also preserve a diverse range of terrestrial habitat types. (Letter 210)

MLSNF – *Fish & Wildlife* Fish and Gooseberry Creek:“...provide high quality habitat for a wide diversity of species from Willow flycatcher to moose and black bear. Such quality and diversity of habitat is unique to the region. There are at least 54 species of birds including the Red-napped sapsucker, Northern goshawk, Broad-tailed hummingbird and Yellow-breasted chat. The site contains the largest breeding population of Willow flycatchers known in the state of Utah. Upper Fish Creek has been noted as an “outstanding example of good riparian management”. The water courses also provide habitat for diverse raptor species, such as golden eagles and red-tailed hawks. The area also provides very high quality, relatively undisturbed, summer and fall habitat for mule deer and elk, including habitat for fawning, calving and rearing. Beaver use the riparian habitat, and bear frequent the corridors of the watercourses.” (Letter 209)

MLSNF – *Wildlife* Hammond Canyon is prime Mexican spotted owl habitat. Protection of the riparian zone is crucial to the continued viability of Mexican spotted owls. (Letter 209)

MLSNF – Lower Dark Canyon including Poison, Deadman, Trail, Warren, Woodenshoe, and Cherry Canyons – We would like to reference some of the data you used to determine legibility of these areas. You stated trout had been planted in poison Canyon. This is not true and an indication as to how far some USFS staff will go to impose their personal agendas. There is hardly enough water in Poison Canyon to muster up a drink let alone support trout. Our members have been all over Dark Canyon, Woodenshoe, and Trail Canyon but we never saw any evidence of minnows the USFS talks about. (Letter 265)

UNF – Provo River - Fish - Provo has some of the best fishing in Utah. Two segments of the Provo River have been designated Blue Ribbon Fisheries by the State of Utah. While these do not include any of the segments under consideration, the segments under consideration do play an important role in keeping those stretches high quality for fish habitat by contributing water flows. (Letter 209)

WCNF – Winter Wildlands Alliance (WWA) believes that the Logan River including its tributaries should become part of the National Wild and Scenic River System and be permanently protected. WWA is writing in support of a positive suitability finding because the criteria for Wild and Scenic River designation are consistent with the values found in this system.

The Logan River System includes: the Logan River from the Idaho line to Beaver Creek (Scenic), Logan River from Beaver Creek to Third Dam (Recreational), Beaver Creek (Recreational), Bunchgrass Creek (Scenic), White Pine Creek (Wild), Spawn Creek (Wild), Temple Fork (Scenic) and Little Bear Creek (Scenic).

Although this river system is acknowledged for its outstanding scenic value, it is at least as important to note that the system maintains a healthy population of Bonneville Cutthroat Trout (BCT). In 1979, the American Fisheries Society designated BCT as threatened throughout its range because of habitat degradation and other factors. The State of Utah considers the BCT a “species of special concern” and the USFS in Region 4 has designated it “sensitive” and has agreed to manage it as such. Proactive management like this is a critical step towards preserving the health of the Logan River tributaries, which include the White Pine Creek tributary. ...Additionally, the Forest Service assumes effects to water quality would be minimal. However, road crossings over streams are one of the biggest sources of sediment and stream runoff because road channels force runoff to concentrate in areas without a riparian area to intercept sediments or surface or subsurface flows (Furniss et al. 1991, Spence et al. 1996). All snow from roads within topographic proximity will likely enter streams. Snowmobiles expel up to 20-30% of their fuel (gas-oil mix) onto snow (Ingersol et al. 1997). In addition, road crossings create barriers to fish movement (Spence et al. 1996). The Forest Service assumes snowmobiles will not use the road crossing during no-snow periods; however, we have documentation that shows damaging snowmobile use during spring when snow coverage is thin and patchy. If completed, this type of project would cause irreparable harm to the values of the whole river system. WWA requests that you permanently protect the Logan River System by granting the whole system National Wild and Scenic River System status. Wild and Scenic River designation is the only mechanism that would adequately and properly protect the incredible resources of this river system. (Letter 106)

WCNF – Logan River – Fish and Wildlife - The river is a Blue Ribbon Fishery, an indicator of the outstanding fishery value of the river system. The BVCT population in the Logan River system is an incredibly healthy population of self-sustaining fish. One of the reasons for the incredible population of BVCT is the high quality and connected habitat. (Letter 209)

WCNF – We are writing this letter to express our support for the wild and scenic designation for the Logan River system including its tributaries - Beaver Creek, Spawn Creek, Temple Fork Creek, White Pine Creek, Bunchgrass Creek, and Little Bear Creek.

...A conservation agreement between the federal and state governments was established for Bonneville cutthroat trout to avoid listing under the Endangered Species Act. Although the federal government had reason to list this species, the state argues that they have greater flexibility in the management of these species without the constraints of ESA and are committed to their protection and recovery. This species is thus considered by the state to be an imperiled species and are of great importance and priority for management commitments by the state.

Recently, a snowroad for motorized winter recreation was proposed in this area that would have crossed several tributaries under consideration for wild and scenic designation. Road crossings from such a road could have several negative impacts on cutthroat trout. Road crossings are one of the biggest sources of sediments and runoff into streams because road channels force runoff to concentrate into areas without a riparian area that generally intercept sediments or surface or subsurface flows. All snow from roads within

topographic proximity will likely enter streams. In addition, snowmobiles expel some of their fuel (gas oil mix) onto snow where it is released during snowmelt. Cutthroat trout spawn in the spring, starting around April. Cutthroat likely use these tributaries for spawning. Because of the widening and shallowing that occurs to streams due to road crossings cutthroat trout movement might be restricted depending on flows. This barrier can result in stranding of adults or reduce access to potential spawning areas. More likely, however, are the stranding of parr during the summer as flow decrease. In addition, oil from road runoff has been shown to reduce egg viability of salmonids. The Forest Service declined the snowroad proposal; however, it appears evident that some of the biggest proponents of the snowroad have had much input on the designation of these waters. We believe that a wild and scenic designation will aid in the protection of these tributaries and mainstem of the Logan River and strongly urge you to support this classification. (Letter 114)

WCNF – Logan River System - Fish and Wildlife – Not only is this river system known around the globe for its outstandingly remarkable scenic value the system maintains a healthy population of Bonneville Cutthroat Trout (BCT). In 1979, the American Fisheries Society designated BCT as “threatened” throughout its range because of habitat degradation and other factors. The State of Utah considers the BCT a “species of special concern” and the USFS (R4) has it designated as “sensitive” and has agreed to treat it as such. Each tributary of the Logan River is crucial to the survival of the BCT since they only occupy 33 percent of their historical range.² A major cause of this reduction in range is habitat degradation, caused by water diversions, overgrazing, and impoundments.

The Logan River and its tributaries have several metapopulations of BCT that are extremely valuable to the species genetic integrity. The health of the Logan River’s tributaries and their free flowing waters are of the greatest importance to maintain this integrity and the designation of such tributaries as White Pine Creek are a proactive and meaningful step forward to address the problems facing the species.

The Logan River is one of only 15 rivers in the State of Utah to be designated as a Blue Ribbon Fishery, an indicator of the outstanding fishery value of the river system. In order to qualify as a Blue Ribbon Fishery several criteria must be met including: Water quality and quantity: A body of water, warm or cold, flowing or flat, will be considered for Blue Ribbon status if it has sufficient water quality and quantity to sustain a viable fishery. (Letter 112)

WCNF – Fish & Wildlife Henry’s Fork does not contain any listed species, but it does contain potential habitat for Colorado River Cutthroat Trout, a sensitive species. Despite the lack of listed species an abundance of wildlife occupy the corridor, including Canada lynx, boreal owl, goshawk, great gray owl, flammulated owl, and three toed woodpecker. Additionally, several types of big animals such as deer, elk, moose, and Rocky Mountain goat inhabit the area. (Letter 209)

WCNF – Bear River –Fish and Wildlife - The headwaters of the Bear River are home to a wide variety of fish and wildlife, including sensitive species of Canadian lynx, river otter, and pure strains of Bonneville Cutthroat Trout. Hayden Fork also supports Leatherside chub, another state sensitive species. Some of the other larger animals that can be found are mule deer, moose, elk, and mountain goat. Additionally, many smaller terrestrial species can be found, including pika, pine marten, and wolverine. These headwaters have been identified as an important fishery of great importance by the State of Utah, which has rated is a Class II. Fish species include rainbow trout, albino rainbow trout, cutthroat trout (possible BVCT, a sensitive species), mountain whitefish, and brook trout. (Letter 209)

WCNF – We would like to recommend the Bear River and its tributaries (including Hayden’s Fork, the Main Fork, the Stillwater, and East Forks) for the Wild and Scenic Rivers designation. The fishing on the Stillwater and East Forks is wonderful. The beaver, elk, moose, deer, and water fowl all depend on these rivers. (Letter 269)

SF 117b – (17) Scenery and or geologic features.

ANF – Scenic value - Whiterocks River is truly incredible, offering a wide range of vistas. The area includes a little bit of everything, ranging from high alpine vegetation to open meadows and sagebrush floodplains. At the very head of the canyon are the towering peaks of the backbone of the Uinta Mountains, including Rose Peak. These high peaks and the Uinta ridgeline greatly increase the scenic value of the area. The Middle Whiterocks River is pristine in nature with no roads and very little evidence of any human activity. The canyon bottom is very rugged and intrepid hikers can see Cliff Lake Falls, along with numerous other small falls and pools. (Letter 209)

ANF – Scenic - The Uinta River basin is extraordinarily beautiful and deserves a scenic ORV based on the diversity of view, special features, and seasonal variation attributes. The Uinta River drains a huge and gorgeous glacial basin. The North Fork tributary originates near the crest of the Uinta range, in the eastern shadow of Utah’s highest mountain, Kings Peak. From glacial cirques and alpine meadows above 10,000 feet, to the forested lower floodplains of the Uinta Canyon, the Uinta River drains some of the most beautiful terrain in northern Utah.

The diversity of the view in the basin is tremendous. The headwaters of the Uinta and its tributaries begin above the tree line in dramatic cirque basins. The river and tributaries then flow through mixed scenery of broad valleys and V-shaped valleys ranging from moderately steep to very steep canyons. Both still and cascading water are visible throughout the basin. The basin also includes a variety of foreground views, including wet meadows, dry meadows and conifer-covered areas. (Letter 209)

ANF – Green River - Scenery and Geology - The geologic and scenic values of the Green River are unparalleled. The river flows through a narrow gorge, starting out just below the monstrous Flaming Gorge Dam and winding down through a canyon that at times has walls right up against the river and at others are farther away from the river. The water is crystal clear, enabling anglers to watch trout swimming from hole to hole. (Letter 209,202)

DNF – Protect Death Hollow Creek, Mamie Creek, Pine Creek, East Fork Boulder Creek, Slickrock Canyon, Cottonwood Canyon, The Gulch, Steep Creek, and Pine Creek because they are very scenic. **North Fork, Virgin River**, because of Cascade Falls and the hike to get there and diversity in scenery. (Letter 15)

DNF – I'd like to support positive suitability findings the North Fork of the Virgin River. I've been fortunate to have been able to do a lot of world travel. I've visited a handful of places that I'd describe as "jaw droppers". The North Fork of the Virgin would be part of that handful of stunning visual glories. I've made three backpacking trips down that stretch of the river and then through the Narrows. I can say that there is no doubt in my mind that hiking the North Fork is one of the most awesome and humbling life experiences anyone can have. And everyone should have that experience once in his or her life. Declaring the North Fork of the Virgin a Wild and Scenic river would protect that wild viewshed for generations, and provide all our descendants the privilege of seeing it unspoiled themselves. (Letter 121)

DNF – North Fork Virgin -Scenic &, Geological The views from Cascade Falls looking down the North Fork of the Virgin River are absolutely spectacular. This is the area of the gorgeous pink cliffs that make several of the national parks in southern Utah so well known (Letter 209).

MLSNF – Scenic value - The scenery of Hammond Canyon is spectacular and is related to the river. Hammond Canyon is a V-shaped canyon, which means that it is stream cut like most of the canyons in Southern Utah and on the Colorado Plateau. The canyon would not exist without the existence of the stream. Hammond Canyon begins high in elevation at around 8,000 feet. The vegetation at the high end includes quaking aspen, stands of towering pines, and lush green meadows. Also located in the canyon are pinyon-juniper, ponderosa pine and Douglas fir. In the foreground are pockets of cottonwood trees at the base of the Canyon and in the background can be seen steep vertical sandstone spires, rock outcrops and alcoves. Hammond Canyon possesses steep, vertical sandstone spires, deep gorges, and cliffs of 400-800 feet.

Hammond Canyon is absolutely gorgeous, with waterfalls and springs. The scenery of this canyon is truly phenomenal and unique. (Letter 209)

MLSNF – Geologic value The overall geology Hammond Canyon is definitely river related since it is a v-shaped canyon, which is a stream cut canyon. Hammond Canyon is a fantastic canyon, with towering sandstone walls, cliffs, and even narrow gorges. The area has a very high abundance and diversity of geologic features. (Letter 209)

MLSNF – Geologic value - The Dark Canyon area is rich in geology. The Canyon possesses some classic channel head cutting and gullies in the alluvial material of the lower reaches. These represent excellent examples and would be great for use as educational and scientific interpretation. Additionally, the steep narrow canyon areas are unique representations of six sequential geologic formations. The upper cliffs of Woodenshoe Canyon are composed of the Cedar Mesa Sandstone, which is also seen at Natural Bridges, and in the Grand Gulch Primitive Area, further south. Anasazi ruins can be found here and there among the most southerly-facing of the ledges and alcoves. The lower part of Woodenshoe Canyon, as one approaches the confluence with Dark Canyon, is characterized by ledges of fossil-bearing limestone, belonging to the Elephant Canyon Formation. These are mostly marine fossils, such as brachiopods and crinoids. Both the limestone and the overlying sandstone were deposited during the Permian age, over 230 million years ago. Further testament to the unique nature of the geology of the area, is the fact that Dark Canyon cuts into the 300-million-year-old Honaker Trail Formation, one of the oldest rock layers exposed in southern Utah. This formation's mixed limestones, shales, and sandstones and the overlying Halgaito Shale and Cedar Mesa Sandstone form the cliffs and talus slopes of Dark, Gypsum, and Bowdie canyons. Dark Canyon is a stream cut canyon. Most of the canyons in Southern Utah and on the Colorado Plateau are stream cut. Thus, it is impossible to say that the geology of Dark Canyon is not river related. The canyon would not exist without the existence of the stream. (Letter 209)

MLSNF – Scenic value “The view from the rim of Dark Canyon is awesome. The canyon is 1,280 feet deep at this point, and the sensation is not unlike the feeling one gets when looking into the Grand Canyon: a feeling of grandeur, a feeling of immensity, and most of all a feeling of personal insignificance.” Dark Canyon also possesses special features. Views are unobstructed and expansive. Vertical cliff walls, rim rock, outcrops, spires, alcoves, arches, moderately deep gorges, and narrow valley floors provide outstanding visual experiences. Significant variations in color are associated with the light and dark greens of mixed conifer/mountain brush vegetative cover. (Letter 209)

MLSNF – Huntington Creek should not have a “scenic” value and don’t believe it qualifies as an ORV. US31, a National Scenic-By-Way was designated because it is part of the “energy loop” and the scenery is no different than the numerous canyons and streams in the area. (Letter 18)

UNF – Protect South Fork of the American Fork River for scenery and close proximity to Provo/Orem urban area. (Letter 23)

UNF – North Fork of the Provo River is located in one of the most incredible, jaw dropping locations along the Wasatch Front- Mount Timpanogos. Visitors to this area are completely overwhelmed with the size and scale of the scenery of the area. The stream’s course is very steep over such a short distance, dropping 1,300 feet over only 1.1 miles. This results in numerous waterfalls and small cascades, all of which are accessed by the main trail that climbs to the top of the Mountain. The parking lot at the trailhead is overflowing on a busy weekend day, with upwards of hundreds of cars parked there, which means that there are thousands of people exploring the area. The river is not the main attraction of the area, but the waterfalls and cascades add immeasurably to the visitor’s experience. (Letter 118, 209)

UNF – Scenic - The Provo River is an incredibly beautiful mountain stream. The variety of scenery ranges from a crystal clear stream surrounded by the towering peaks of the Uinta Mountains and lodgepole pine to

areas further downstream containing openings of sagebrush. One of the most spectacular vistas in the entire Wasatch Front is located along the North Fork Provo River. This short segment flows off the towering, majestic form of Mt. Timpanogos down through a series of steep walls and cascades. Near the bottom of the segment the vista includes waterfalls, cascades, several large glacial cirques, steep cliffs, and the snow capped pinnacle of Mt. Timpanogos overlooking the entire scene. (Letter 209)

WCNF – Logan River – *Scenery and Geology* - The scenery is fantastic, ranging from a narrow river gorge with towering limestone cliffs, riparian vegetation, snow-capped peaks in the distance, and roaring white water. There is an incredible diversity of features, including caves (Logan Cave and Ricks Spring), rock outcrops, narrow gorges, wide meadows, and distance vistas of snow capped mountains. Near where the Right Hand Fork enters the Logan the river has undercut the limestone cliffs in areas. Starting at the Card Canyon picnic site the canyon is very narrow with towering limestone cliffs. Further up the canyon near Choke Cherry there are nice rapids on the river and the canyon is still very narrow with spectacular limestone cliffs. In the foreground is the roaring river with rapids, towering limestone cliffs, narrow canyon, then in the distance up and down valley are snow-capped peaks. About halfway up the canyon opens up and becomes much wider with more expansive views. Juniper forest lines the hillside along with rock bands, but there is still the presence of riparian vegetation. When the canyon opens up is when the eligible tributaries start to enter the main stem of the Logan River. Another tributary, Bunchgrass Creek is a spectacular small, narrow valley. It is not easy to locate the trail to get into the valley from the highway. It is a very small creek, running in a narrow valley filled with Aspen and some firs and pines higher up in the valley. The creek is very clean with clear water. (Letter 209)

WCNF – Logan River System - The scenery is bar none and has recently been featured in a book by National Geographic called the *Last Unspoiled Place*. This is just one of many national and international recognitions given the Logan River and the canyon it resides. (Letter 112)

SF 117c – (17) Cultural and/or historical.

ANF – Green River - *Historical and Cultural* - The Green River was the medium for one of the most daring journeys of discovery in American history. In 1869 John Wesley Powell and his crew traveled this last great-unexplored region of the United States of America. This northernmost section of the Green River in Utah is the site of two campgrounds used by Powell and his men during their journey. In just this short segment of the Green River numerous cultures are represented, including Paleo-Indian, archaic, Fremont, late prehistoric, and historic cultures. Not only are all their sites representing all of these different cultures, but the segment includes ‘textbook’ examples of the above mentioned cultures. (Letter 209, 202)

MLSNF – The MLSNF contains remarkable and outstanding values. The Wasatch Plateau divides the Colorado Plateau and the Great Basin. The Wasatch Plateau is adjacent to the San Rafael Swell, a unique and outstanding desert landscape. The Wasatch Plateau provides the water for the San Rafael Swell and made occupation by Native Americans (both prehistoric and historic populations) and European descendent pioneers possible. The Spanish Trail followed the base of the range and crossed the range in the vicinity of the southern end of the Manti-La Sal NF. The early settlers of Castle Valley entered from the San Pete and Sevier areas over the Wasatch Plateau. The watercourses of the Wasatch Plateau played a crucial role in the movement of both historic and prehistoric peoples.

The La Sal and Abajo Mountain Ranges are unique lacolithic ranges projecting from the slickrock and canyon country of the Colorado Plateau. Because of their isolation the mountains contain endemic flora and fauna or with only scattered and small populations in similar ranges on the Colorado Plateau. These lacolithic ranges harbor some of the most intensive and extensive archaeologically significant areas found on any National Forest. (Letter 70, 117)

MLSNF – Fish Creek - *Cultural and Historical* The area has been used by ancient peoples for thousands of years. There are many prehistoric sites located in the river corridor. Additionally, the area has a history of

mining and ranching. On top of these already high qualifications, lucky visitors with a sharp eye can even find dinosaur tracks in the sedimentary rocks of the watershed. (Letter 209)

MLSNF – Cultural value The spectacular cultural resources found throughout Hammond Canyon and other drainages originating in the Abajo Mountains are a fundamental component of Ancestral Puebloan adaptations focused on the nationally recognized Cedar Mesa ecosystem. This expression occurred primarily during Pueblo II and Pueblo III times, but also with evidence of earlier Basketmaker and later Numic and Athapaskan occupations. Cultural resources in these drainages are themselves nationally significant historic properties eligible for listing on the National Register under Criterion A in that they are associated with events that have made a significant contributions to broad patterns of history (the florescence and subsequent abandonment of the Four Corners by Ancestral Puebloan farmers), and under Criterion C in that architecture and rock art found here embodies distinctive characteristics of type, periods of time and method of construction that constitute a significant and distinguishable entity, even if components lack individual distinction. Most importantly, they are eligible under Criterion D in that resources found in this area, which remain largely unstudied, have significant potential to yield important information about Ancestral Puebloan adaptations to higher elevation environments adjoining the Cedar Mesa, how environmental changes through time facilitated or constrained human occupations of these regions, and the concurrent social factors that led to population expansion into marginal environments and the subsequent collapse of these farming societies. In fact, the Cedar Mesa phenomenon can only be understood when placed into the context of human adaptations to adjacent environments. The significance of prehistoric properties in the Cedar Mesa and adjacent higher drainages originating in the Abajo Mountains has long been recognized by visitors from throughout the nation for their spectacular architectural integrity. This region has been the focus of scores of popular magazine feature articles and guidebooks that have brought these resources to a national audience of hikers, ORV users and archaeological enthusiasts. Likewise, archaeologists have recognized the scientific significance of this region, having studied the resources here for more than a century. Indeed, artifacts recovered from this region are currently displayed at museums around the nation. Therefore, Hammond Canyon possesses a cultural value of national significance. (Letter 209)

MLSNF – Cultural The cultural resources in Dark Canyon span 6,000 years. These include different cultures such as archaic and ancestral Pueblos. This time period demonstrates that the Canyon was occupied by various cultures. Dark Canyon is not just a locally important cultural resource. Dark Canyon is part of the Cedar Mesa archaeological phenomenon, which is during the Pueblo 2/3 phase of history. The Cedar Mesa archaeological phenomenon is recognized through out the nation by the general public and by professionals as a significant national resource. (Letter 209)

MLSNF – Upper Dark Canyon – We do not believe the area contains the significant cultural resources sites that you claim. There are many other areas where cultural resources are more outstanding. (Letter 265)

MLSNF – Lower Dark Canyon including Poison, Deadman, Trail, Warren, Woodenshoe, and Cherry Canyons – You speak of significant archaeological site that have national register quality. Almost any where you go in San Juan County you will experience the same quality resources. This should not make this area eligible for Wild and Scenic designation. You are stretching the facts. (Letter 265)

WCNF – Historical Henry’s Fork has been host to people in several different eras, including prehistoric people and early explorers of the western United States. The mouth of Henrys Fork was a favorite wintering area for Indians, the first site chosen by trader/explorer William Ashley for a rendezvous of mountain men. Ashley later moved the meeting place 20 miles higher up Henrys Fork. Additionally, Henry’s Fork has a set of prehistoric petroglyphs that are potentially eligible for inclusion in the National Register of Historic Places. (Letter 209)

WSR 200 – General comments.

Thank you for moving forward with the Wild and Scenic River study for Utah's beautiful rivers. (Letter 92)

Keep these rivers open to the public. Too much access has already been denied the taxpaying citizen. (Letter 90)

Segments found at the headwaters of a drainage pose fewer concerns than segments found in lower reaches of a drainage, due to fewer conflicts and existing uses (Letter 122, 149, 221)

Major questions to be addressed:

- a. How would Wild, Scenic, or Recreational designations affect future water management and development?
- b. Are there planned or potential projects that would be adversely affected by Wild, Scenic, or Recreational designations?
- c. Are there stream segments, particularly in upper watersheds, that could be designated without harm to water users and which might be of benefit locally?
- d. Are there any possible benefits that may be associated with the designation (i.e., tourism)? (Letter 165)

Carbon County's submission to the Scoping process would be to ask the Forest Service to address the following issues and observations in both the interdisciplinary and public review process. In order to better inform our citizens and the core team, we believe that an analysis of all of the impacts from designation or from management by a federal agency even though designation never occurs would be appropriate to make a better informed decision.

- Please review and address the validity of maintaining the funding needed to manage the River segments found to be suitable if they were to be designated.
- Are the local citizens interested or supportive of this effort?
- What would the impact of judicial decisions to protect, "the outstandingly remarkable values" have on the already over appropriated flows of water into Scofield Reservoir?
- Are the elected officials of Carbon County and other affected Counties interested in designation?
- What is the State of Utah's position on designation?
- Is the Utah Congressional Delegation supportive of designation?
- How would upland and watershed management practices to increase both the quality and quantity of the stream flows be affected or impeded by designation?
- How would designation affect any historic or cultural uses of the land in this area, such as grazing?
- Would designation improve wildlife management in the area?
- Is this segment nationally significant? If so what is the national significance of this segment?
- How would designation affect any private land in the area?
- Is access controlled in such a way as to not impair or create trespass on private property by designation?
- Could designation create an outcome negatively impacting the tax base in the area?
- Would local communities or subdivisions in the area experience increased visitation that the rural infrastructure is not prepared to manage?
- How would any negative impacts to designation be absorbed by the management agency?
- Please review and add into any decision making documents the number of cultural and historic activities restricted or completely prohibited on segments of river designated after designated.
- Please analyze and add into any decision making documents the number of cultural and historic activities restricted or completely prohibited because of legal intervention contravening Congressional designation decrees.
- Please analyze and add into any decision making documents the number of designated wild and scenic river segments that are now being managed under a judicial order instead of a Forest Service management plan.
- If designated, could the managing agency maintain the outstandingly remarkable characteristics in the face of a large increase of visitation? Would this affect the naturalness and character of the stream or the

quality and quantity of water flows into Carbon County's only Reservoir holding the majority of its drinking and agricultural/industrial use water. (Letter 207)

Wild and Scenic Rivers should not be diminutive segments of rivers locked up in small legislative cages but a generous means to create balance in the management of water so vital to all of life in our mostly arid region. In this way all streams deserve the highest level of consideration. It should be the heavy burden to show that a stream does not deserve protection rather than a heavy burden to show a stream deserves protection. Protecting the sources of water is one of the mandates of the Forest Service and it would be a shame if it could not accept the responsibility to do justice to this final means of achieving one of the prime goals of the Forest Service. (Letter 117)

DNF – The Cascade Falls, part of the North Fork of the Virgin River, are fed from Navajo Lake. In the past, attempts to alter the lake have harmed the flows to the falls. While no such activities have occurred recently, the USFS should take this hydrology into account in order to ensure protection of the flows into the North Fork through the falls. (Letter 154)

MLSNF – Designation of Roc Creek will not affect San Juan County since the segment is only ¼ mile. (Letter 7)

WSR 201 – Designate all rivers.

I would like to voice my support for the protection of all of the segments under study for designation under the Wild and Scenic Rivers Act. (Letter 2, 75)

Red Rock Forests supports Congressional designation for all segments in the state that will ultimately be classified as "Wild and Scenic". The full force of the statute is necessary to ensure the long-term protection of the values of these rivers in Utah. (Letter 70)

As one of the only states without any rivers yet designated under the Wild and Scenic Rivers Act, I believe the Forest Service should recommend that as many rivers as possible be listed by Congress. (Letter 235)

Any river segment would be unique and outstanding within the concept of Wild and Scenic since there are no rivers with such a designation or recommendation in Utah. (Letter 70, 117)

I strongly urge the Forest Service to designate all *eligible* wild and scenic river segments in Utah *suitable* for inclusion in the national Wild and Scenic River System under the Wild and Scenic River Act.

...Many members and supporters of Western Wildlife Conservancy enjoy Utah rivers and the values they support, including: bird-watching, sight-seeing, camping, canoeing, fishing, etc. For all these Reasons, we urge the Forest Service to identify eligible segments as suitable for inclusion in the national Wild and Scenic Rivers System. (Letter 155)

As a 74 year old Utahan who in years past has hiked many times in the Uintas, I hope you will make maximum wild and scenic river designations for the benefit of the children and grandchildren of all of us. (Letter 143)

I support a positive suitability finding for all outstanding rivers on Utah's National Forests I strongly support finding rivers suitable for Wild and Scenic River status because they all possess qualities that make them excellent candidates for inclusion in the National Wild and Scenic River System. (Letter 232)

Each river segment should receive "Wild" protection or full protection under Wild and Scenic Rivers Act. (Letter 243)

WSR 202 – Designate some rivers.

Designate all 43 segments of rivers located in the Uintah Mountains. (Letter 3)

ANF – Protect the Green River. Let's start with the 13 mile section. (Letter 51)

DNF – Rivers I would like to see as being Wild and Scenic in Utah - North Fork of the Virgin River and Moody River. (Letter 145)

MLSNF – I support Wild and Scenic River status for Hammond Canyon, Chippean and Allen Canyons; Upper Dark Canyon, including Horse Pasture, Peavine, and Kigalia; Lower Dark Canyon, including Poison Canyon, Deadman Canyon and Woodenshoe and Cherry Canyons, as well as Butts, Arch, and Texas Canyons. (Letter 236)

MLSNF – Which river segments make worthy additions? Lower Left Fork of Huntington Creek, Hammond Canyon, Chippean and Allen Canyons, Upper Dark Horse Pasture/Peavine & Kigalia Canyons in Upper Dark Canyon, Lower Dark Canyon. (Letter 243)

WCNF – The uniqueness and outstanding values, whether recognized officially or not, of these rivers are unarguably some of the most precious gems of creation and deserve our utmost protection. We strongly urge the Forest Service to find the following rivers suitable:

Logan River and tributaries – White Pine Creek (wild); Bunchgrass Creek (wild); Spawn Creek (wild); Little Bear Creek (scenic); and Beaver Creek (recreational);

High Creek (wild, recreational)

Headwaters of the Bear River – West Fork Blacks Fork; East Fork Blacks Fork; East Fork Smiths Fork; Ostler Fork; Left, Right, and East Forks Bear River; Boundary Creek. (Letter 112)

MULTIPLE – I support a positive suitability finding for all outstanding rivers on Utah's National Forests, and especially those I am familiar with: North Fork of the Virgin River (Wild), Moody Wash, Green River (Scenic), Henrys Fork (Wild), Death Hollow Creek (Wild) and Dark Canyon (Wild & Recreational). I look forward to protecting all of the rivers studied so I will have a chance to enjoy these riparian resources in the future. (Letter 100)

MULTIPLE – I support Wild and/or Scenic status for the following rivers: Uinta River - Wild Shale Creek - Wild Green River - Scenic Logan River - Scenic White Pine Creek - Wild Little Bear Creek - Scenic Hayden Fork - Scenic North Fork of the Virgin River - Wild Upper Yellowstone - Wild Henry's Fork - VERY Wild North Fork Provo River - Recreational Dark Canyon – Wild (Letter 205)

MULTIPLE – I'd especially like to support designation of the Green River stretch below Flaming Gorge, the Yellowstone, Uinta, Little Cottonwood Creek, Logan, North Fork of the Virgin, Salina Creek and Red Butte Creek. These rivers clearly deserve protection and are easily suitable under the Forest Service Handbook's review structure. (Letter 201)

MULTIPLE – Worthy additions starting in Daggett County – Green River below Flaming Gorge Dam to the Colorado. Provo River in its entirety. Ogden River from Uintahs to Great Salt Lake. I lean strongly towards preservation of wilderness rivers in Utah (Letter 27)

MULTIPLE – The following rivers deserve Wild and Scenic designation: Bear River, Hayden Fork, Logan River, San Rafael River, Muddy Creek, Fremont River, Green River, Colorado, Dolores River, San Juan, Ferron Creek, Escalante River, Huntington Creek, Ogden River, Cottonwood Creek, Price River, Provo River, Duchesne River, Strawberry River, and White River. (Letter 96)

MULTIPLE – Consider the following for inclusion in the National Wild and Scenic River System: Green River, Henry’s Fork, Logan River system, Whiterocks River, Upper Uinta River, Fish and Gooseberry Creeks, Headwaters of the Bear River, North Fork of the Virgin River, Upper Yellowstone River, Provo River, Huntington Creek, Butts, Arch, and Texas Canyons, Hammond Canyon, Dark Canyon, Moody Wash, Manning Creek, Death Hollow Creek. (Letter 94)

WSR 203 – Do not designate any rivers.

Do not designate river segments because there are enough resources tied up that we need and can’t use. (Letter 13)

We request that all of the segments being considered for suitability be removed from consideration as wild and scenic rivers. (Letter 71)

Which rivers make worthy additions? None, I want the right and privilege to access and enjoy the rivers just the way they are. (Letter 137)

We would like to let you know that we are opposed to doing a Wild and Scenic River Suitability Study. The government and environmental are putting to much restriction on how we can use our national forest and rivers. By doing this study we feel it will do more damage to our water systems or anyone using the river water sources that come from our Nation Forest. (Letter 136)

What river segments being studied do you think make worthy additions to the national wild and scenic rivers system and why?

...No river segments would make worthy additions (Letter 138)

...None. (Letter 262, 253)

Rivers already run wild – don’t do anything to them. (Letter 139)

WSR 204 – Do not designate specific rivers.

Do not designate segments of any stream lying outside the High Uintas Wilderness. (Letter 19)

All the water of Uinta County originates within the headwaters of the Uinta Mountains. The USFS should be cognizant of the necessity to refrain from over regulation and over restriction of the citizen’s use and access to the waters of the Uinta Mountains. (Letter 54)

Implementation of the Wild and Scenic Rivers Act has taken on a life of its own, far beyond the original intent of Congress. This evolution has resulted in conflicting interpretations of terms such as “free flowing” and “outstandingly remarkable values.” In many instances, river segments being evaluated in the study do not meet the original congressional intent. We urge the team to employ a conservative approach that results in relatively few segments identified as suitable under the provisions of the Act. (Letter 122, 149, 221)

We wish to reiterate our stance that none of the evaluated segments in southwestern Utah muster sufficient grounds to recommend as suitable for inclusion in the national wild and scenic river system. They are simply too short to justify their inclusion. The outstandingly remarkable values identified can be found along most streams in similar terrain across the Colorado Plateau. Existing land use management regulations provide more than enough ability to protect the identified values. Many officials see the push for WSR designation as just another impediment to common sense multiple use management envisioned in the Organic and National Forest Management Acts. (Letter 122, 149)

DNF – Garkane opposes a finding of suitability for the East Fork of Boulder Creek, located on Dixie NF, for wild or scenic river designation. (Letter 270)

DNF – Moody Wash does not muster sufficient grounds to recommend as suitable for inclusion in the national Wild and Scenic River system. The segment is simply too short to justify its inclusion. The ORVs identified can be found along most streams in similar terrain across the Colorado Plateau. Existing land use management regulations provide more than enough ability to protect identified values. Many officials see the push for WSR designation as just another impediment to common sense multiple use management envisioned in the Organic and National Forest Management Acts. (Letter 268)

MLSNF – The Wild and Scenic River Act mandates that a river have two basic features to qualify as a wild and scenic river: 1) the river must be free-flowing, and 2) the river must possess one of several ORVs. Fish Creek does not meet either standard for this designation. (Letter 222)

MLSNF – SWCD strongly opposes giving wild and scenic status to the Fish Creek segment. (Letter 125)

MLSNF – Emery County believes Lower Left Fork of Huntington Creek should not be found suitable for Wild and Scenic River designation. (Letter 153)

MLSNF – Regarding the wild river segments in the Abajo Mountains. I have worked in the Elk Ridge area, hunted and played there as well and for the life of me I can't remember any of those wild rivers that you talk about. There are no wild rivers in the Abajo Mountains! This is just another ruse to close those areas off and frankly it infuriates me. How can they be suitable for your study when they don't exist? (Letter 248)

MLSNF – The City of Monticello would like to comment concerning the designation of any wild and scenic rivers in San Juan County. We would be against any WSR designation within the county because nothing on Forest Service property could even qualify as a wild and scenic river. We also feel with a WSR designation, further restrictions would be applied to public lands than is currently. This is just another step in the wrong direction by the Federal Government. They have created something on the East Coast and now are trying to figure out a method of applying it here. Please consider no WSR designation here in San Juan County. (Letter 259)

MLSNF – We do not believe Congress ever intended for the Wild and Scenic River Act to include any of the drainage identified by the Forest Service, in San Juan County. We believe the law is obvious that it intended the act to cover the major rivers of the U.S...

If you were interested in experiencing a wild and scenic river and you selected Allen Canyon, I believe, when you got here you would be highly miffed when you were unable to locate this wild river. The process you are using to determine wild and scenic rivers is highly misleading. The general public is going to be looking for a river and only find a dry dusty wash bottom. (Letter 265)

MLSNF – I have read and agree with the comments submitted by San Juan County. I don't believe any of the river segments identified by the Moab / Monticello Ranger District on the Manti-La Sal NF come even close to what Congress had intended for a Wild and Scenic River. I have been to the areas specified and agree with the position of San Juan County. These areas may have some wilderness and scenic characteristics, but certainly are not rivers and are a far stretch of an interpretation of the Wild and Scenic Rivers Act. (Letter 262)

...We agree with San Juan County's stand in their letter of Aug 13, 2007, on wild and scenic rivers in the San Juan County area. (Letter 263)

...I concur with San Juan County's findings and recommendations for Mill Creek Gorge, Chippean and Allen Canyon, Lower and Upper Dark Canyons and Hammond Canyon. (Letter 254)

...I read the information I received at the open house in Monticello, Utah on July 26, 2007 and I read the letter, dated August 13, 2007, from the San Juan County Commission. I agree with the letter sent by the

commission. In my opinion, the four river segments in the Abajo Mountains, do not meet the requirements necessary to be considered “wild rivers”. (Letter 257)

... Arch Canyon, Hammond Canyon and any other places in San Juan County outside of the San Juan and Colorado Rivers should not be considered for designation under the wild and scenic rivers act.

I think that tighter control that would come from wild and scenic rivers designation would only make it worse for everyone especially the local people who love this area and already take good care of it. (Letter 246)

UNF – Public lands committee objects to include Little Deer Creek. It is extensively used for multiple use resources and won’t benefit the general public. Opportunities now enjoyed would be compromised if segment was included. It is currently being managed to provide protection and preservation of its free-flowing condition and immediate environment. It does not display special characteristics that would set it apart from any other creek. No outstanding features, other than Cascade Spring that would make it eligible. Evaluation criteria used to rate this segment are speculative and the conclusion could just as well have been to not include this segment. (Letter 29)

WCNF – Summit County - Hayden Fork; Main Fork Weber River; Middle Fork Weber; Beaver Creek; Provo River. With the exception of the Provo River Segment, these are short in length (8 miles long or less). We question the advisability of designating a river segment as being Wild and Scenic that is so short in length. (Letter 151, 152)

WSR 205 – Protected by law or more protective designation already in place.

There is no need for designation within forest boundaries because the Forest Service will not allow development. Outside forest boundaries rivers and streams are already developed to the point that designation is reverse process. Forest Service standards and regulations are more strict than Wild and Scenic designation. (Letter 53)

We urge you to designate all segments of rivers originating in the High Uintas Wilderness as both eligible and suitable for inclusion in the Wild and Scenic Rivers System, even where they extend beyond the wilderness boundary, if they satisfy the necessary criteria. There is no reason to exclude any of these segments when they satisfy all the criteria and eligibility and suitability. It is irrational not to include them for the entirely arbitrary reason that they are not within the designated wilderness. Being within a designated wilderness really isn’t a criterion, all by itself, for eligibility or suitability. Anyway, it is these segments that most need protection, not the upstream segments of the wilderness. (Letter 155)

UWCD and OPIC feels that current resource protections are sufficient and that no new protections are warranted.

UWCD and OPIC does not support acting to further protect or manage these segments. (Letter 71, 157)

Duchesne County requests Wild and Scenic River designations, if any, be limited to wilderness areas, where solely public ownership exists. (Letter 124)

The current methods have proven effective. Why are we adding layers of bureaucracy? (Letter 83)

A review of the Act and other federal documents relating to Wild and Scenic River designations raises serious concerns regarding potential local impacts likely to result from W&S designations. For example, designated rivers running through local jurisdictions could lead to condemnation if local zoning does not conform to the purposes of the Act. The Act provides that the Secretary shall issue guidelines specifying standards for local zoning ordinances consistent with the Act. Private lands within the river area must be evaluated for compatibility with the Act. Activities that would degrade existing water qualities would be abated. No explicit standards or guidelines exist leaving management decisions to local manager’s

judgment. New building on private property may be required to be similar in scale and location to pre-existing structures. Instream flow studies may identify limits of acceptable flow and water quality changes. These factors could threaten state water rights use. In fact, Kane County, Garfield County and the Kane County Water Conservancy District are currently litigating GSENM restrictions regarding the beneficial use of state water rights. While incentive carrots are emphasized restrictive regulations and regulatory action may be, and often are, employed if the carrot is deemed unsuccessful.

Protection measures that can be employed include land use regulations (e.g., flood plain zoning) critical areas protection laws (e.g., wetlands protection laws), physical barriers to development, and conservation ownership. Private and state lands can be acquired through purchase, exchange or federal condemnation in order to protect the river area. The goals of river area management are protection, non-degradation and the enhancement of values. (Letter 109, 110)

We are opposed to any change in land and water uses. The current multiple-use system is sufficient and we do not need to change the rivers systems status. This is only another way of extending the wilderness boundaries-just leave them at their present levels. (Letter 130)

The USFS has every management tool and resource needed to manage and protect nominated rivers. These rivers would have little or no significant gain by being designated by Congress as Wild and Scenic rivers. (Letter 126)

The description of the ORV's in the eligibility report should make it clear that existing management has well protected these areas. The need for change must be analyzed and disclosed. To date there has been no analysis of existing protection for identified ORV's. Many such as cultural have existing and adequate protections. (Letter 148, 211)

The general plan contains the following policies associated with Wild and Scenic Rivers, which are based on Utah State law codified at Section 63-38d-401(8). Duchesne County support for the addition of a river segment to the Wild and Scenic Rivers System shall be withheld until:

(v) it is clearly demonstrated that the provisions and terms of the process for review of potential additions have been applied in a consistent manner by all federal agencies;

Duchesne County understands that all valid, existing rights will be recognized if a river segment is designated. The county is especially concerned that water user's rights and quantity and timing of water yields are not adversely impacts.

In 2005, Duchesne County raised the point that it seems unnecessary to designate rivers within a wilderness. Existing wilderness is the best method to protect the segments and Wild and Scenic River designation is unnecessary layering of protective regulations. (Letter 124)

We feel generally that many of the river segments that are proposed for designation can be maintained and protected for the public use and enjoyment without national designation. (Letter 150, 151, 152)

We support the protection of our beautiful rivers and creeks. However, we believe that existing policy will provide the same protection on most river segments in our area and would be at less cost to the taxpayer than that provided by National Wild and Scenic designation and express our opposition to such designation. (Letter 150, 151, 152)

ARPA, NEPA, NFMA, FLPMA, ESA and the Forest Management Plan provide more than adequate protection for the identified free-flowing character, outstanding remarkable values and water quality of each of the identified river segments. (Letter 262)

The Forest Service already has the tools necessary to protect these areas. Use the existing tools, reduce the administrative burden and let Forest Service employees get away from their desks and out on the ground where they belong. (Letter 258)

At best, this is a half baked scheme to provide wilderness protection to pretty places – and additional stipulations to already designated wilderness (Letter 244).

Wild and scenic rivers are just another way of limiting valid uses of our public lands, and plays directly into the hands of those preservation groups who want the entire area locked up in wilderness. The USFS has the proper managers and support people to analyze any proposed action on our forests and to make multiple use decisions. (Letter 265)

MLWUA sees no need for WSR designation on rivers that are already protected by being in the High Uinta's Wilderness area. (Letter 164)

I wish to comment specifically on the rivers that originate in the Uinta Mountains.

I have examined your map and list of rivers and noticed that most of the river segments you identify as eligible for inclusion in the national Wild and Scenic Rivers System terminate at or near the wilderness boundary. Why is this? It appears rather arbitrary. I would really love to hear the official explanation for it. I don't see how this can be justified given that the wilderness boundary is an artificial boundary that would not normally be expected to affect the natural qualities of the rivers.

It is true that the wilderness boundary was drawn where it is in part due to features of the landscape, and this may to some extent explain the line drawing for river eligibility. However, it is hard to believe that this would make a satisfactory explanation in every case. It is hard to believe that wild, scenic, recreational and wildlife values of rivers all shrink precipitously at or near a wilderness boundary, then abruptly expand further downstream—as in the case of Blacks Fork from the confluence of the East and West Forks to Meek's Cabin Reservoir. Why isn't this river eligible throughout all its branches all the way to their headwaters? In this connection, what about the prospects for restoring some stretches of some of these rivers so that they can once again support populations of native cutthroat trout? Wouldn't Wild and Scenic designation assist in moving us toward this worthy goal?

River segments inside the High Uintas Wilderness already enjoy substantial protection. Consequently, Wild and Scenic designation for them wouldn't really do much for them. However, it would make the Forest Service appear to be actively engaged in protecting our forests and rivers while actually not doing much in the way of providing real protection for them. I don't wish to be cynical, but that's the way it looks.

All rivers originating in the Uinta Mountains should be identified as eligible throughout their entire lengths so long as they meet the statutory criteria for eligibility. Likewise for suitability. I urge you to take another look at these rivers—a hard one. (Letter 204)

The following proposed segments are either wholly or partially located in a National Wilderness Preservation Area (Summit County): Henry's Fork; West Fork Beaver Creek; Middle Fork Beaver Creek; Thompson Creek; West Fork Blacks Fork; East Fork Blacks Fork; Little East Fork; Blacks Fork; West Fork Smiths Fork; East Fork Smiths Fork; Stillwater Fork; Ostler Fork; Left, Right, and East Forks Bear River; Boundary Creek; High Creek; Left Hand Fork Blacksmith Fork.

These river segments are some of the most wild and scenic in Utah, and should rightfully be protected and preserved, however, the Wilderness Act is the legislation that should guide the preservation in these areas. (Letter 151, 152)

ANF – I think that all of the river segments that are being considered qualify and should be designated with their respective classifications in the Wild and Scenic Rivers system. I am disappointed that so many of the rivers that are being considered for designation in the Ashley National Forest are only being considered where they occur in the High Uintas Wilderness, with their designation ending at the wilderness boundary. I would like to see the designation extend as far as possible – in most cases this could probably be to the Forest Service Boundary. The proposed segments already receive a great deal of protection by being in designated wilderness, and I would like to see them also receive protection downstream where they are more at risk. (Letter 200)

DNF – Pine Creek, Mamie Creek, Death Hollow Creek (Garfield County) – These segments are located within a congressionally-designated wilderness area, with an existing wilderness management plan in place. The outstandingly remarkable values identified are already protected and managed under the provisions of the wilderness area. Identification as suitable is an unnecessary redundancy. (Letter 122)

DNF – The North Fork of the Virgin River segment is within the USFS, which currently has the management tools providing significant protection to water, resources, values, and lands even beyond the proposed WSR boundaries. The report also considered the benefits of a “systems approach” from managing an entire river or watershed, including the ability to design a holistic protection strategy in partnership with other agencies and the public. Is that systems approach realistic regarding the North Fork of the Virgin River segment? And, what would the impacts, both direct and cumulative, be with or without systems management? The up gradient river segments from Zion NP are protected by WSA status, USFS management and the *Zion National Park Water Rights Settlement Agreement*. Planning should consider through analysis and alternative development whether additional WSR protection is necessary in light of current protection. The Technical Report asks “Is there demonstrated commitment to protect the river by any nonfederal entities who may be partially responsible for implementing protective management? As addressed in these comments such commitment does not exist and adequate management protection may already be in place.

Protective Management

The report compares and contrasts the interim protection afforded congressionally authorized and agency-identified study rivers under Sections 5(a) and 5(d)(1). A river authorized for study by Congress receives statutory protection under Section 7(b), water resources projects: 8(b), land disposition: and 9(b), mining and mineral leasing. However, a river identified for study through agency planning process **is not** protected under the Act. Rather, protection of its free-flow, water quality, and ORVs occurs through other agency authorities. (Letter 109, 110)

DNF – The East Fork of Boulder Creek does not warrant additional protections through WSR designation because the USFS, the Utah DWR, and Garkane have developed the framework and strong working relationship to protect the creek. Pursuant to Section 4(e) of the Federal Power Act, the USFS already introduced the conditions it deems necessary for the adequate protection and utilization of the East Fork of Boulder Creek through Settlement Agreement discussed above and filed with FERC on April 7, 2006 in Docket No. P-2219. FSH 1909.12, Chapter 80, reflects that designation may not be necessary where a segment is already protected in other ways. (Letter 270)

DNF – Moody Wash: The values identified in the Forest Service analysis are already being addressed in an interagency cooperative management agreement. Wild and Scenic River designation is an unnecessary duplication of effort that will not result in any protections not already addressed. Designation will complicate effective management of important values. (Letter 268)

FNF – Millard County is opposed to designation of Corn Creek because management currently provides for protection and use of the resource. (Letter 217)

MLSNF – Use current resource management plan that is now in place. These areas are not in danger of being destroyed and adding another layer of protection won’t make any difference. The free-flowing characteristics are questionable – The water quality is not in danger and the ORVs are very similar to many other areas in the county. Please don’t allow political pressures by special interest groups to sway this decision. (Letter 245)

MLSNF – As for step 3 in your determination sheet should the river be protected? From what? They are not threatened by anything. What is the best method of protection? Leave them alone. ...I find it ridiculous these areas were considered. (Letter 255)

MLSNF – I support San Juan County in saying that this act would not benefit this area at all. That we have enough current rules and regulations to help protect the areas in question. (Letter 261)

MLSNF – I believe that no additions need to be made to the National Wild and Scenic Rivers system. The following groups already provide adequate protection for the identified river segments ARPA, NEPA, FLPMA, ESA and the Forest Management Plan. I have read and agree with San Juan County's policy on Wild and Scenic Rivers. (Letter 264)

MLSNF – All eligible supposed river segments in San Juan County are not rivers and are all ready protected through existing laws and regulations (Dark Canyon Wilderness area, etc.) this is just another attempt to lock up the land for single use. (Letter 247)

MLSNF – Mill Creek is free-flowing, but should not be suitable because there are diversions above and below the area that will impact its classification as “wild.” The creek is in a National Research Area and doesn't need additional protection. (Letter 7)

MLSNF – PacifiCorp supports current management efforts directed toward Huntington Creek and Left Fork of Huntington Creek by the USFS, BLM, and private interests. PacifiCorp believes these efforts are sufficient to protect the river segments for a variety of needs which they meet and that designating these segments as suitable is not necessary. (Letter 163)

MLSNF – Huntington Creek and Left-Hand Fork of Huntington River do not have outstandingly remarkable values and it does not make sense to designate them. Existing management provided by the Forest Service and BLM have protected the rivers. Do not designate because of the possible impact to water development, irrigation, economic impact to communities, and they may need future impoundments. Existing land use, existing industries, existing water facilities, existing reservoirs and impoundments, water rights and future planned developments make this river “unsuitable.” (Letter 18)

MLSNF – Hammond Canyon – In your discussion on cultural resources you speak of significant values. We agree there may be some nice archaeology in that area but what more protection can the Wild and Scenic River Act give it over existing laws designed to protect those values. It appears application of the Wild and Scenic Rivers Act in this county is overkill. The USFS currently has all the tools necessary to properly manage this area. The USFS should rely on the least restrictions that meet their management goals, (Letter 265)

MLSNF – *Characteristics which do or do not make the area a worthy addition to the National System.* San Juan County does not support Chippean and Allen Canyons and Hammond Canyon as suitable for inclusion as a Wild and Scenic River.

From past and present discussions with Forest Service Archeologists and others knowledgeable about the issues associated with cultural resources, it appears that completed inventories and the determination of their relative importance are incomplete, inconclusive or unavailable. Therefore, although the area has cultural sites, it is unknown how many or what kind are located within the area which would be designated as a wild and scenic river. The Archeological Resource Protection Act (ARPA), the National Environmental Protection Act (NEPA), the National Forest Management Act (NFMA), Federal Land Policy Management Act (FLPMA) as well as the Forest Management Plan provides for protection of these cultural resources without a wild and scenic river designation.

...The Public Lands Council recognizes the recreational, cultural and scenic qualities of these canyons, but feels they can best be protected by the Forest Service through good multiple use management. Congress through ARPA, NEPA, NFMA, FLPMA, as well as the many other laws and regulations has provided all of the tools necessary to protect these canyons. The Forest Plan should also provide adequate protection for any cultural, recreational or scenic qualities. (Letter 252)

MLSNF – The Lower Dark Canyon is so deep that you could never make any changes in this area. Wilderness is plenty of restrictions for the areas! (Letter 256)

MLSNF – Lower Dark Canyon including Poison, Deadman, Trail Warren Woodenshoe and Cherry Canyons – SPEAR does not support designation in this area. This area has already been designated as wilderness by Congress. What more can the Wild and Scenic River designation for that the Wilderness Act can not do? This is overkill and unnecessary. (Letter 265)

MLSNF – My constituents have a problem with sections such as Upper and Lower Dark Canyon. These areas are currently protected as a Wilderness Area - a very high level of protection - and they do not understand what another layer of protection will do for these sections. Furthermore, the agency already has ARPA, NEPA, NFMA, and FLPMA as protection tools without adding WSRA to the mix. Thus, if the Forest Service desires to add these sections for protection reasons the people of Monticello do not support such an additional "layer" of protection. (Letter 260)

MLSNF – The map indicated for Upper and Lower Dark Canyon, some portion lies outside of the Dark Canyon Wilderness boundary, while most is within the wilderness. I disagree with designating watercourses within the wilderness because their qualities are given adequate protection through the Wilderness Act. There is no need to expend additional taxpayer dollars on such duplication. Designating the portions of a watercourse outside of the wilderness boundary is appropriate only if the geologic and cultural qualities your team identified are located in the creek segment outside of the wilderness. (Letter 249)

MLSNF – Upper Dark Canyon – We do not support this area for designation. This area already has a wilderness designation on it, how much more restrictive can you get then that? We do not understand the idea of stacking designations. What does this accomplish? (Letter 265)

MLSNF – This is a sampling of descriptions to justify eligibility which are erroneous and assessed values were not directly river related as required by the Process and Criteria for Interagency instruction booklet. This seems especially true when reviewing the evaluation criteria found in Appendix B of the PROCESS and CRITERIA for INTERAGENCY USE booklet page 17. This appendix lists six evaluation criteria for cultural.

Significance - there are no major Anasazi sites, no rare, unique, or unusual sites when compared to surrounding sites.

Current Uses - No sites or features that are significant to Native American populations today.

Number of Cultures - There is only one culture Anasazi.

Site Integrity - There are no exceptional examples of Native American and pre-historic features. There are literally thousands of sites within the 4 Corners area that are equal to or greater exceptional examples of Native American and pre-historic features.

Education/Interpretation - Again there are thousands of sites in the 4-Corners area that better represent "textbook" examples of a Native American or other pre-historic culture than anything in these segments. The fact that the Forest Service has never attempted to provide any interpretation/education opportunities within these segments further substantiates the fact that they are not significant when compared to surrounding sites.

Listing/Eligibility - Although there may be sites eligible for the National Register, their significance when compared to the thousands of sites in the surrounding area is very small.

The Archeological Resource Protection Act (ARPA), the National Environmental Protection Act (NEPA), The National Forest Management Act (NFMA), Federal Land Policy Management Act (FLPMA), The Wilderness Act as well as the Forest Management Plan provides for protection of the resources without a wild and scenic river designation. The area is already protected by special status as part of the Dark Canyon Wilderness. Stacking another special designation that doesn't add any further protection does not make sense. (Letter 252)

...Listing/Eligibility - Although there may be sites eligible for the National Register, their significance when compared to the thousands of sites in the surrounding area is very small.

From past and present discussions with Forest Service Archeologists and others knowledgeable about the issues associated with cultural resources, it appears that completed inventories and the determination of their relative importance are incomplete, inconclusive or unavailable. Therefore, although the area has cultural sites, it is unknown how many or what kind are located within the area which would be designated as a wild and scenic river. The Archeological Resource Protection Act (ARPA), the National Environmental Protection Act (NEPA), The National Forest Management Act (NFMA), Federal Land Policy Management Act (FLPMA) as well as the Forest Management Plan provides for protection of these cultural resources without a wild and scenic river designation. The entire Four Corners area has cultural resources and there is nothing unique about Upper Dark Canyon. In fact the area is very generic compared to adjacent and surrounding areas. (Letter 252)

MLSNF –

- San Juan County does not support Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons as suitable for inclusion as a Wild and Scenic River. This area is currently Congressionally designated as the Dark Canyon Wilderness Area. The Wilderness Act dictates the management and what uses are allowed. It is unclear what changes, if any, would be allowed if the area were included in the Wild and Scenic River system.
- San Juan County does not support Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons as suitable for inclusion as a Wild and Scenic River. This area is currently Congressionally designated as the Dark Canyon Wilderness Area. The Wilderness Act dictates the management and what uses are allowed. It is unclear what changes, if any, would be allowed if the area were included in the Wild and Scenic River system. It is even more unclear as to what further protection or benefits wild and scenic river status could provide that is not already in place with wilderness status. San Juan County's opinion is that no further protection or benefits will be available by designation wild and scenic river status in the Dark Canyon Wilderness. (Letter 252)

MLSNF – *The federal agency that will administer the area, should it be added to the System*

San Juan County does not support Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons or Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons as suitable for inclusion as a Wild and Scenic River. The Manti-La Sal National Forest administers this drainage as well as the land surrounding it as part of the Federally designated Dark Canyon Wilderness Area. The current Forest Service administration has proven effective in protecting the outstandingly remarkable values of this area. The Wilderness Act itself mandates this protection. Adding another layer of protection such as Wild and Scenic Rivers would not provide additional protection but may rather make management of the area more difficult and confusing. (Letter 252)

UNF – The following proposed segments in Utah County are whether wholly or partially located in a National Wilderness Preservation System: North Fork Provo River; South Fork American Fork River. It seems redundant to designate river segments within federal wilderness as National Wild and Scenic Rivers. The segments are also very short (1 mile long). We question if it is wise to designate a river segment that is so short. We are mindful of potential costs associated with management of these designated rivers, and believe that existing policies are in place to protect and preserve the scenic and wild quality of these river segments. (Letter 150, 152)

UNF – The only river segment proposed in Wasatch County is Little Provo Deer Creek (3 miles). We question if it is wise to designate a river segment as being Wild and Scenic that is so short in length. We are mindful of potential costs associated with management of these designated rivers, and believe that existing policies are in place to protect and preserve the scenic and wild quality of these river segments. (Letter 152)

WCNF – The following segments are too short for effective management under the wild and scenic river system, and the USFS already protects the outstandingly remarkable values:
High Creek: High Creek Lake to Forest Boundary; Logan River: Idaho State line to confluence with Beaver Creek; Beaver Creek: South Boundary of State Land to Mouth; White Pine Creek: Source to Mouth – A road crosses this creek. Temple Fork: Source to Mouth – A road runs along the lower portion of this river. Spawn Creek: Source to Mouth – A road runs along the lower portion of this river. Bunchgrass Creek: Source to Mouth – A road runs along and cross over a portion of this creek. (Letter 221)

WCNF – Left Hand Fork Blacksmiths Fork: Source to Mouth – Except for approximately one mile on the west end of Left Hand Fork Blacksmiths Fork Canyon the ORVs are already protected by the USFS. (Letter 221)

WCNF – Logan River: Confluence with Beaver Creek to Bridge at Guinavah-Malibu Campground – The USFS already protects the outstandingly remarkable values of this entire segment of the Logan River. (Letter 221)

WCNF – We feel rivers free flowing through currently designated wilderness are no-brainers and should easily continue on to the designation process. Our organization feels that this provides additional protection—by ensuring that a dam or diversion will never be built. It provides additional recognition these rivers deserve.

These rivers include: High Creek; West Fork Blacks Fork; East Fork Blacks Fork; East Fork Smiths Fork; Ostler Fork; Left, Right, and East Forks Bear River; Boundary Creek.

Secondly, as these rivers leave designated wilderness, or flow through remarkable landscapes and habitat, consideration for their designation should remain high. (Letter 112)

WSR 207, 209, 211 – Changes to: the determination of eligibility; wild, scenic, or recreation classification; and/or to outstandingly remarkable values (ORVs) for segments being studied in suitability study.

The state law states that the “water-related” value must be considered outstandingly remarkable. The tentative classification for several of the segments being considered is listed as “Scenic”. The scenic values described in most of the segments has to do with the scenery outside of the river corridor of ¼ mile on each side of the river and therefore are not “water related”. (Letter 71, 157)

With regard to many river segments the UWCD said “the tentative WSR classification is Scenic even though the description of the Scenic Value has more to do with the surrounding area than is does with the segment and the segment’s corridor”. While I think the areas surrounding the rivers are scenic, I believe the river itself is in each case an integral part of the overall beauty of the area. (Letter 200)

Note that the Outstandingly Remarkable Values do not require rarity in order to qualify a river for consideration under the Wild and Scenic Rivers Act. Nor is it required that the Forest Service cherry-pick a single or only a few rivers with Outstandingly Remarkable Values. Again we must emphasize that the Wild and Scenic Rivers Act was intended to create a balance among the uses of the rivers and watercourses in our nation. (Letter 70, 117)

ANF – Upper Uinta River – the segment from Crescent Lake to the confluence of Shale Creek has been dry since the construction of the dam in the early 1930s. There was a small dike constructed and a man-made channel cut at that time which allows water from Crescent Lake, when released to flow into Fox Lake (also the overflow flows into Fox Lake) and therefore it cannot be considered eligible for suitability. (Letter 55)

ANF – Had I been in charge of eligibility study, I would have begun Whiterocks River a few hundred yards south of the Chepeta lake outlet after the river had crossed under the Chepeta Lake Road, combined the

Upper Whiterocks segment with the Middle Whiterocks segment and classified the entire combined segment as “wild.” Relatively soon after crossing the Chepeata Lake Road, the Whiterocks begins forming the canyon it is noted for. (Letter 103)

ANF – Upper Whiterocks River, West Fork Whiterocks River, Reader Creek The tentative WSR classification is Scenic even though the description of the Scenic Value has more to do with the surrounding area than it does with the segment and the segment’s corridor itself.

East Fork Whiterocks River The tentative WSR classification is Scenic even though the description of the Scenic Value has more to do with the surrounding area than it does with the segment and the segment’s corridor itself. The conclusion on page 118 of the “Final Eligibility Determination of Wild and Scenic Rivers” shows that it does not qualify as Wild, Scenic, or Recreational.

Middle Whiterocks River The tentative WSR classification is Scenic even though the description of the Scenic Value has more to do with the surrounding area than it does with the segment and the segment’s corridor itself. One of the Scenic items mentioned as visible from this segment is the Cliff Lake Falls which would not exist were it not for Cliff Lake reservoir.

Lower Dry Fork Creek Much of the historical value cited along this segment is on the one mile segment of private land in the middle of the segment and should therefore not be included. The flume mentioned in the report under historic value was never used for timber harvesting activities as stated nor are there any irrigation canals in this segment. The flumes were constructed in an effort to by-pass the sinks to increase the flow in the stream for irrigation far below this segment. The flume never functioned as envisioned and was abandoned. This entire segment has a road immediately adjacent to the stream bed. Due to the “sinks”, this entire section is dry at least nine months of the year and only has water flowing in it during High Water May-July. The sinks above this segment provide much of the water that surfaces in the Ashley Spring at the mouth of Ashley Gorge and provides much of the Municipal and Industrial water that is treated at the two treatment plants in the Ashley Valley. This connection has been proven in the past through dye testing. The Forest Service has chosen to end this segment at the point where private ownership resumes and yet did not give that same deference to the private land owners within the segment.

...The document mentions an alluvium and outwash near the canyon mouth; what it fails to mention is that much of that alluvium and outwash came from a large wash out incident in 1997 from saturated soils and an iced Mosby canal. The Tentative WSR for this segment is Recreational and yet there is no evaluation of the ORV for recreation. The only mention of recreation is under the heading of current uses wherein it is mentioned that “some kayaking and canoeing occurs in portions of the creek for about a 30 to 40 day period during early spring runoff”. That statement is an extreme exaggeration of reality. Those who own the private property within this segment and immediately below this segment have not witnessed any of these activities for as far back as anyone can remember. Probably the most glaring of the misrepresentations in the report on this segment is that “Colorado River Cutthroat trout are present but may be depressed”, and that “Brook Trout are present with a strong population”. Unless these trout can live in dry stream beds or thrive underground in the “karst” system, this statement is patently false and makes one wonder how much of the other comments are simply made up.

South Fork Ashley Creek There are several roads and trails that cross this segment with Red Cloud Loop being the main one which is probably why it is listed as Scenic rather than Wild or Recreational. I would again question whether the scenic value described in the report is within or outside of the ¼ mile corridor on either side of the stream. Most of the descriptions seem to be outside of that corridor and are therefore not “water related”. Much of the irrigation and other water used in the Ashley Valley either originates in or flows through this segment.

Ashley Gorge Creek The report cites fishing in only the upper portion of this segment; that is because low flows or dry streambeds are prohibitive of fishing lower in the gorge. The report also cites limited kayaking and canoeing on the lower half of the gorge for about a 30 to 40 day period during early spring runoff. We have inquired of many people who are familiar with this segment including Ashley Valley Water and Sewer District whose treatment plant is located at the mouth of the gorge and not one of them can remember ever seeing or being aware of anyone using the gorge for canoeing or kayaking. The extremely rough and steep

access and the steep fall of the water along with the debris in the stream during high water would make canoeing virtually impossible and kayaking extremely dangerous to the point of life threatening. (Letter 71)

ANF – Daggett County: Middle Main Sheep Creek and Lower Main Sheep Creek (Recreational) and Green River (Scenic) these suitability classifications seem appropriate. (Letter 57)

ANF – Would like to see the classification of Scenic changed to Recreations for: Carter Creek, Cart Creek Proper, and Pipe Creek. This is because of grazing, existing water usage, proximity of roads, and recreational activities. (Letter 57)

DNF – To be eligible for designation, a river must be free-flowing and possess one or more ORVs. While the determination that a river contains ORVs is a professional judgment, it must be based on objective, scientific analysis. In addition, input from organizations and individuals familiar with river segment resources should be sought and documented as part of the process. Suitability may be arbitrary if based on casual opinion rather than objective scientific analysis.

The minimal data and analysis presented in documents to this point may not support suitability status regarding the North Fork of the Virgin River segment in Kane County. Was the North Fork of the Virgin River segment recommended for Wild and Scenic status by the public? Was local support or the lack of local support by the public and local governmental considered in the eligibility process? (Letter 109, 110)

DNF – Kane County Proposed Segment – North Fork Virgin River – The segment is proposed as “wild.” If it is ultimately included in the W&S River System it may be more appropriate as a scenic or recreational segment due to its close proximity to other activities and uses and because of the unique nature of the very short segment as visitation to Cascade Falls, the only really unique feature in the segment. (Letter 109, 110)

DNF – Garkane takes this opportunity to question the “eligibility” of the East Fork Boulder Creek for WSR designation. In particular, the USFS has failed to perform an eligibility evaluation for the East Fork of Boulder Creek and to provide a clear discussion of the ORVs it is found to possess. Failing to provide such a discussion hinders Garkane’s ability to comment on the eligibility or the suitability of the East Fork of Boulder Creek and does not comply with the Wild and Scenic Rivers Act.

It is simply not clear what ORVs the USFS has identified for East Fork of Boulder Creek. The list of eligible river segments on the USFS website as part of the July 11, 2007 “Briefing Packet” describes the creek’s ORVs as “Scenic, Recreational, Cultural, Ecological.” In contrast, the Fishlake and Dixie NFs June 2007 Wild and Scenic River Eligibility Evaluation identifies the ORVs as “Scenic, Recreational, Fish.”

...None of the USFS documents identifying East Fork of Boulder Creek as eligible for WSR status elaborates on these ORV findings. The June 2007 document does not evaluate East Fork of Boulder Creek because it was found eligible in a previous study and refers to the Grand-Staircase-Escalante NM 1998 WSR assessment...however, no such detailed summary or evaluation for the creek is provided.

Garkane submits that a proper eligibility evaluation has not been performed as required by Sections 1(b) and 2(b) of the Wild and Scenic River Act. In *Sokol v. Kennedy*, 210 F.3d 876 (9th Cir. 2000), for instance, the Ninth Circuit Court of Appeals rejected the river designation boundaries determined by the NPS because it failed to identify and seek to protect ORVs, as required by the WSR Act. By failing to provide a true evaluation of the eligibility of the Creek, the USFS has committed a similar legal error. A changing of the three-or-four list of factors fails to demonstrate that the USFS used reasoned decision-making to find the East Fork of boulder Creek is eligible for WSR status.

...East Fork boulder Creek is but one of multiple streams in the Grand Staircase-Escalante National Monument originally identified by the BLM as eligible. This small segment shares similar characteristics with several other creeks nearby. It is not clear that the creek possess any traits so outstandingly remarkable, in light of the large number of similar creeks... To the extent the USFS rejects Garkane’s request to reconsider the eligibility of the East Fork of Boulder Creek the Forest Service should consider such factors as part of its suitability evaluation. (Letter 270)

MLSNF – The USFS description of views from Mill Creek are not accurate. It is located in the bottom of a deep gorge and views the Abajos are not available from within the corridor. Descriptions of Mill Creek should only include what can be seen or accomplished from the corridor. (Letter 7)

MLSNF – San Juan County does not support Hammond Canyon as suitable for inclusion as a Wild and Scenic River. The Forest Service has classified this canyon as Scenic which the San Juan County Public Lands Council agrees with. However the main scenic qualities are not within the proposed Wild and Scenic River corridor. The steep, vertical sandstone spires, escarpments of 400-800 feet, deep gorges, vertical spires and large alcove features, which make up the scenic qualities, are outside the proposed Hammond Canyon Wild and Scenic River corridor. The County does not agree with the statement made by the Forest Service in their description which states “views are expansive and unobstructed within the canyon.” Views from the canyon bottom are often obstructed and limited. However magnificent scenic views such as the Hammond Canyon overlook on forest road 088 and along the Hammond Canyon rim do provide expansive and unobstructed views of the canyon. These are all well outside the proposed Wild and Scenic River corridor. It appears evident that virtually nothing that happens along the proposed Wild and Scenic River corridor would have any effect on the scenic qualities of Hammond Canyon. (Letter 252)

MLSNF – San Juan County does not support Chippean and Allen Canyons as suitable for inclusion as a Wild and Scenic River. The Forest Service has classified this canyon as Scenic which the San Juan County Public Lands Council agrees with. However the main scenic qualities are not within the proposed Wild and Scenic River corridor but are viewed from points well outside of the corridor. None of these provide views of the bottom of the canyon and the proposed Wild and Scenic River corridor. Although the canyon is scenic it is not unique to the area. There are numerous canyons in the region with similar scenic qualities. It appears evident that virtually nothing that happens along the proposed Wild and Scenic River corridor would have any effect on the scenic qualities of Chippean and Allen Canyons. (Letter 252)

MLSNF – Lower Left Fork of Huntington Creek – This river remains in the list of rivers eligible for designation under the Wild and Scenic Rivers Act. This river should receive designation as a Scenic River. Since this river retained its value under this study it is puzzling that other rivers should have been dropped from study.

RRF, TWS and SUWA support the descriptions in the *Final Eligibility of Wild & Scenic Rivers – Manti-La Sal National Forest*. (Letter 70, 117)

Huntington Creek – This river remains on the list of rivers eligible for designation under the Wild and Scenic Rivers Act. This river should receive designation as a Scenic River. Since this river retained its value under this study it is puzzling that other rivers should have been dropped from study.

RRF, TWS and SUWA support the descriptions in the *Final Eligibility of Wild & Scenic Rivers – Manti-La Sal National Forest*.

[Since the flow of Huntington Creek is regulated by the dam for Electric Lake impoundments alone cannot preclude study for designation under the Wild and Scenic Rivers Act. Other rivers were dropped because they were judged not to be free flowing. This should not effect river eligibility for study since a watercourse which appears natural, has relatively natural seasonal variation in flow and is regulated to deliver water downstream should remain in the list of rivers included in the final list of eligible rivers.] (Letter 70, 117)

Fish Creek and Lower Gooseberry Creek – Forest Service recommended these watercourses for designation as Scenic. Area is considered to have high wildlife value. RRF, TWS, and SUWA would consider these areas to be high in recreational, and possibly fisheries value as well. RRF, TWS, and SUWA recommend a Wild classification from Fish Creek Campground to Fish Creek headwaters. We also recommend a Wild classification for Gooseberry Creek from campground to private land boundary with the remainder receiving a Scenic classification.

Fish Creek and Lower Gooseberry Creek is important habitat for most game animals in Utah, including those on the M-LS NF MIS list. The area is valuable habitat for Williamson’s sapsucker, dwarf shrew, Utah milk snake, Utah mountain king snake, western boreal toad, northern goshawk, and many migratory bird species. Fish Creek is a prime fishery and is known as a fly-fishing destination in Utah.

Fish Creek contributes a large portion of the water for Schofield Reservoir, the Price water supply. The area should be kept as primitive as possible to protect the water quality entering Schofield Reservoir. (Letter 70, 117)

Fish Creek and Gooseberry Creek – Forest Service recommendations for these watercourses is Scenic. Area is considered to have high wildlife value. UEC would consider these areas to be high in recreational, and possibly fisheries value as well. UEC recommends a Wild classification from Fish Creek Campground to Fish Creek headwaters. We also recommend a Wild classification for Gooseberry Creek from campground to private land boundary with the remainder receiving a Scenic classification. (Letter 166)

Hammond Canyon – RRF, TWS, and SUWA support the descriptions in the *Final Eligibility of Wild & Scenic Rivers – Manti-La Sal National Forest*. We also make the following comments in addition to those in the report.

Hammond Canyon is recommended for “Scenic” classification from its headwaters to the national forest boundary. Its rating of “potential outstanding remarkable values” is “high for scenic, geologic/hydrologic and cultural” values. It is listed as “free flowing” and its scale of importance is “national”. (Page 1, Item E-Attachment 2)

Based upon the definitions of “Wild” and “Scenic” rivers provided within the draft packet, Hammond Canyon appears to qualify for classification as a “Wild” river segment unless the area is not “essentially primitive” and the shoreline is “accessible in places by roads.” RRF, TWS and SUWA assume that for purposes of determining the presence of roads along the rivers evaluated and within their respective watersheds, the Forest Service used the same criteria used for roadless area inventories or within the Manti-La Sal National Forest LRMP.

According to the Manti-La Sal National Forest’s Travel Plan, there is a “Recreation Trail” that begins at the forest boundary and terminates at Little Notch on Elk Ridge. This trail does not qualify as a “road” under any of the definitions contained within the LRMP FEIS or the Draft Intermountain Region Desk Guide.

Hammond Canyon, according to the Travel Plan, is generally inaccessible “except by trail” and lies entirely within a “semi-primitive non-motorized” area. Therefore, the question of whether Hammond Canyon qualifies for “Wild” classification under the Wild and Scenic Rivers Act rests upon the question of whether or not Hammond Canyon has “watersheds or shorelines” that are “essentially primitive and waters unpolluted.”

The vast majority of Hammond Canyon is within the Hammond-Notch Canyon Roadless Area and has been recognized as roadless since the current LRMP was finalized in the mid 1980s. According to the analysis prepared for this roadless area prior to adoption of the current LRMP, “Except for archeological sites, the area is relatively pristine.” The roadless area has been impacted by some old uranium mining activity and roads, but virtually all of this activity has taken place above the canyon rim, and should have no bearing on Wild or Scenic River designation.

The river running through Hammond Canyon is not large enough to support watercraft, making motorized recreational use of the river impossible. There can legally be no ATV use within the area due to its designation on the Travel Plan of “semi-primitive nonmotorized.” Furthermore, Hammond Canyon is relatively remote and it would be difficult for ATVs to enter the area.

Based upon the above arguments, the RRF, TWS, and SUWA believe the Manti-La Sal National Forest should recommend the canyon be classified as “Wild” instead of “Scenic.” Red Rock Forests also proposes the Hammond Canyon area including Notch Canyon for wilderness study during the M-LS NF Plan Revision. The roadless character of the canyon makes this an ideal river for designation as Wild.

Hammond Canyon is prime Mexican spotted owl habitat. Protection of the riparian zone is crucial to the continued viability of Mexican spotted owls. (Letter 70, 117, 166)

Chippean and Allen Canyons – RRF, TWS, and SUWA support the descriptions in the *Final Eligibility of Wild & Scenic Rivers – Manti-La Sal National Forest*. We also make the following comments in addition to those in the report.

These segments are recommended for classification “Recreational.” The segments in question run from the headwaters to the junction of Allen Canyon with South Cottonwood Creek. They are ranked as “High for Scenic, Geologic/Hydrologic & Cultural” values and “national” in scale of importance. All segments are considered free flowing.

Much of the area is located Allen Canyon- Dry Wash Inventoried Roadless Area with a small portion located within the Cliff Dwellers Pasture unroaded area according to analyses prepared prior to the completion of the current LRMP. Chippean Canyon does not contain any trails or other man made influences (excluding archaeological) below the rim that should preclude it from being classified as “Wild.” We recommend Chippean Canyon be classified as wild from the headwaters to the confluence with Allen Canyon. (Letter 70, 117, 166)

The trail in Allen Canyon going south from the private property is not used, is within a roadless area and should be closed. RRF, TWS, and SUWA propose wilderness designation for the Allen Canyon area. The roadless character of the canyon system should be maintained and motorized recreation should be prohibited. We also recommend Allen Canyon be classified as Wild from the private property boundary (Private property west of Bayles Ranch) to the confluence of Allen and Chippean Canyons. The area below the confluence should also be recommended for Wild designation. (Letter 70, 117)

Upper Dark Canyon, including Drift, Horse Pasture, Rig, Peavine, and Kigalia Canyons – RRF, TWS, and SUWA support some of the findings in the *Final Eligibility of Wild & Scenic Rivers – Manti-La Sal National Forest*. We also make the following comments in addition to those in the report.

This entire river system should be designated as Wild. The motorized trail descending Kigalia, Peavine, Rig, and Dark Canyons should be closed. At a minimum until the motorized trail is closed Drift, Horse Pasture, Peavine above the confluence with Kigalia and Rig Canyon above the drill pad should be treated separately and studied for designation as Wild.

This section of the Dark Canyon complex is at the heart of Mexican spotted owl habitat and is the center for protected areas of concern for the Forest. Every effort should be made to protect Mexican spotted owl habitat. (Letter 70, 117)

Lower Dark Canyon, including Poison, Deadman, Trail, Warren, Woodenshoe and Cherry Canyons – RRF, TWS, and SUWA support the findings in the *Final Eligibility of Wild & Scenic Rivers – Manti-La Sal National Forest*. We also make the following comments in addition to those in the report.

Dark Canyon is the only designated Wilderness Area in the Manti-La Sal NF. As such every opportunity to enhance the conservation of Dark Canyon should be pursued and made permanent in all management plans. The Lower Dark Canyon complex should be designated as Wild. The surrounding landscape already receives protection. Water rights are a moot question since Dark Canyon drains directly into the Colorado River (Glen Canyon Dam Reservoir).

The Lower Dark Canyon complex is home to Mexican spotted owls. With the neighboring upper Dark Canyon complex and the Arch Canyon complex this is the major known habitat of Mexican spotted owls on all of the Forests in Utah. Wild designation of this river will enhance riparian zone protection that could prove crucial to the viability of the owls. (Letter 70, 117)

Mill Creek Gorge – RRF, TWS, and SUWA support some of the findings in the *Final Eligibility of Wild & Scenic Rivers – Manti-La Sal National Forest*. We also make the following comments in addition to those in the report.

Mill Creek includes a Research Natural Area. The canyon and stream are only accessible on foot. Brush makes any other form of travel difficult. The public rarely accesses it. (Letter 70, 117)

Roc Creek – RRF, TWS, and SUWA support some of the findings in the *Final Eligibility of Wild & Scenic Rivers – Manti-La Sal National Forest*. We also make the following comments in addition to those in the report. We would disagree with the evaluation of the Scenic qualities of the river. We found little evidence of human activity, certainly none that would diminish an aspect of a scenic designation.

The portion of Roc Creek under study is in a deep canyon. It is remote and wild. To the north lies a roadless area within the Forest. Outside of the Forest is the Sewemup Wilderness Study Area. The connectivity of this corridor with other protected landscapes enhances its value for wildlife habitat, enhances the wilderness experience of visiting the river, and enhances the sense of naturalness. Scenic, Geologic and Hydrologic values are very high for Roc Creek. (Letter 70, 117)

MLSNF – My constituents do not see, nor do they understand the outstanding remarkable values of proposed sections such as Allen, Hammond and Chippean Canyon, especially when equally or more outstanding sections such as Texas and Arch Canyons have been deemed not to have outstanding values and are not

being proposed as wild and scenic rivers. It seems to them that either all these sections should be proposed as suitable sections or none of them should be deemed as suitable. My constituents prefer the latter. Therefore, for the reasons above I do not support and my constituents do not support the designation of Upper and Lower Dark Canyon, Allen, Chippean, and Hammond Canyon as suitable sections of river/stream/streambed for designation as wild and scenic rivers. (Letter 260)

MLSNF – Congress also provided a process whereby additional rivers which met criteria could be designated. It is the application of this process which we feel the Forest Service has erred. We do not feel any of these segments (Upper and Lower Dark Canyon, Hammond Canyon, and Chippean and Allen Canyon) should have been determined to be eligible since they do not have flowing water. We also recognize that there may be ORVs such as scenic, cultural, etc. but that these values are not river related which is necessary to be eligible. (Letter 252)

MLSNF – *Characteristics which do or do not make the area a worthy addition to the National System.*

- San Juan County does not support Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons as suitable for inclusion as a Wild and Scenic River.
Reference is made to the agreement between the Bureau of Land Management, the USDA Forest Service, and the National Park Service and the subsequent instruction booklet “Wild and Scenic River Review in the State of Utah - Process and Criteria for Interagency Use.” When reviewing this instruction booklet and then reviewing the Final Eligibility of Wild and Scenic Rivers - Manti-La Sal National Forest it becomes apparent that the Forest Service has either not used the interagency instruction booklet or at best have been extremely liberal in its application. Some examples of this are statements found in the description of the Outstanding Remarkable Values such as:
“Transportation Routes.....” The entire first paragraph describes routes well outside Upper Dark Canyon are not river related as described in the instruction booklet.
“Fish and Wildlife -Minnows are found in the spring and pothole areas of Dark Canyon, Trail Canyon, and Woodenshoe Canyon.” San Juan County questions the accuracy of this statement and would appreciate evidence to verify this. Numerous visits by County residents and employees as well as present and former Forest Service employees have failed to confirm any evidence of minnows in Lower Dark Canyon. “Trout have been planted in Poison Canyon.” This is the most incredulous statement made in the entire Forest Service Final Eligibility Determination Wild and Scenic Rivers report. One is about as likely to find trout in Poison Canyon as elephants in the Pacific Ocean.
“The corridors of the watercourses contain potential habitat for Mexican Spotted Owl, goshawks and Peregrine falcons. It is also part of areas included in the “Condor Management Plan”, which establishes potential habitat for this species.” This watercourse is within a designated wilderness which precludes the introduction of species which were not there naturally.
- San Juan County does not support Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons as suitable for inclusion as a Wild and Scenic River.
Reference is made to the agreement between the Bureau of Land Management, the USDA Forest Service, and the National Park Service and the subsequent instruction booklet “Wild and Scenic River Review in the State of Utah - Process and Criteria for Interagency Use.” When reviewing this instruction booklet and then reviewing the Final Eligibility of Wild and Scenic Rivers - Manti-La Sal National Forest it becomes apparent that the Forest Service has either not used the interagency instruction booklet or at best have been extremely liberal in its application. Some examples of this are statements found in the description of the Outstanding Remarkable Values such as:
“Transportation Routes.....” The entire first paragraph describes routes well outside Upper Dark Canyon are not river related as described in the instruction booklet.
“Fish and Wildlife -Minnows are found in the spring and pothole areas of Dark Canyon.” San Juan County questions this accuracy of this statement and would appreciate evidence to verify this. Numerous visits by County residents and employees have failed to confirm any evidence of minnows in Upper Dark Canyon.

“The corridors of the watercourses contain potential habitat for Mexican Spotted Owl, goshawks and Peregrine falcons. It is also part of areas included in the “Condor Management Plan”, which establishes potential habitat for this species.” This watercourse is within a designated wilderness which precludes the introduction of species which were not there naturally.

“FDR 089 is a four wheel.....” “The road crosses the watercourse numerous times and is the source of active erosion and down cutting of the canyon bottom.” It is hard to refrain from accusing the Forest Service of deceit and lies to promote an agenda with statements such as this. As part of the management of the Dark Canyon Wilderness, Congress required the Forest Service to monitor FDR 089 (Peavine Corridor) to determine its affect on the wilderness. A plan was developed and studies set up to measure the amount of soil loss etc. along the road. These studies have not shown any soil loss or degradation as a result of the road, in fact in most years the studies actually show an increase in soil along the roadway. The plan and study results should be on file in the Monticello District Office.

“FDR 378.....” The above information for FDR 089 also applies to this road.

“Most cattle grazing occur on the mesas outside of the canyon areas. Some grazing does occur in the headwaters of the canyons.” There is also grazing within the wilderness area from the headwaters down to approximately the junction of Rig Canyon and Dark Canyon. (Letter 252)

- San Juan County does not support Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River. Reference is made to the agreement between the Bureau of Land Management, the USDA Forest Service, and the National Park Service and the subsequent instruction booklet “Wild and Scenic River Review in the State of Utah - Process and Criteria for Interagency Use.” Page one of this book states “The agreement calls for the three agencies to work cooperatively to define common criteria and processes for use in determining the eligibility and suitability of Utah rivers for potential inclusion by Congress in the National Wild and Scenic Rivers System (NWSRS).”..... It further states “The intent of this paper is to provide a uniform methodology to be used by the three agencies to obtain consistent results in wild and scenic river eligibility assessments made during planning efforts in the state of Utah.”.... Page 5 of this booklet lists key points regarding the nature of outstandingly remarkable resources. “1. River-related. All values assessed should be directly river-related. They should be located in the river or river corridor (at least 1/4 mile from the ordinary high water mark on each side of the river), contribute substantially to the functioning of the river ecosystem and its public value, or owe their location or existence to the river.”..... When reviewing this instruction booklet and then reviewing the Final Eligibility of Wild and Scenic Rivers - Manti-La Sal National Forest it becomes apparent that the Forest Service has either not used the interagency instruction booklet or at best have been extremely liberal in its application. Some examples of this are statements found in the description of the Outstanding Remarkable Values such as:

“Views of the alpine peaks are dramatic. Defined and narrow canyons focus the eye from the peaks to the majestic views of the desert floor below, including the long, narrow Spanish Valley at the foot of the mountains.” Although this is a true statement of views outside of the Mill Creek Gorge, it is not true of the watercourse itself. This watercourse is named a gorge for good reason. It is a narrow with nearly vertical walls and dense vegetation at the bottom. None of the views described can be seen from the watercourse itself.

“The canyon area is the principal migration route for elk and deer as they move back and forth from summer to winter range.” Because of the vertical rock cliffs and boulders along the bottom, it is virtually impossible for deer and elk to migrate along this watercourse. There is probably no place along the entire western slope of the La Sal mountains where deer and elk are less likely to be found than in this section of the Mill Creek Gorge.

“The La Sal Loop Scenic Backway experiences moderate to heavy traffic during mid-summer to late fall months, attracting both national and international visitors.” This is probably a true statement, however the La Sal Loop Scenic Backway is not located within the Mill Creek Gorge.

The Public Lands Council recognizes the geologic/hydrologic, and scenic qualities of this canyon, but feel they can best be protected by the Forest Service through good multiple use management. Congress through NEPA, NFMA, FLPMA, as well as the many other laws and regulations has provided all the tools necessary to protect these canyons. The Forest Plan should also provide adequate protection for

any geologic/hydrologic or scenic qualities. Mill Creek already is managed under a special designation as part of the Mill Creek Research Natural Area. It is also designated in the Forest Plan as Semi Primitive non motorized. It is hard to visualize what further protection would be provided with an additional special management designation.

The Forest Service has classified this canyon as wild which the San Juan County Public Lands Council somewhat agrees with. However the main scenic qualities are not within the proposed Wild and Scenic River corridor but are viewed from points well outside of the corridor. None of these provide views of the bottom of the canyon and the proposed Wild and Scenic River corridor. It appears evident that virtually nothing that happens along the proposed Wild and Scenic River corridor would have any effect on the scenic qualities of Mill Creek Gorge. (Letter 252)

UNF – Little Provo Deer Creek is recommended as recreational but shows no ORVs for scenic, recreation, or white water. The upper reaches located on the Wasatch Mountain State Park have a diversion pipeline to irrigate their golf course which could significantly reduce the flow of the creek. Cascade Springs is intensively developed, erosion and impairment in some places adversely affects water quality. The number of fords, culverts, road fills, and footbridges significantly impairs the natural free flow of this segment. This segment does not meet the criteria for potential classification as described on page V-43 of Uinta National Forest Inventory for Wild and Scenic Rivers Eligibility and does not meet the Wasatch County Public Land Ordinance. (Letter 17)

WCNF – Blacks Fork: confluence of West Fork and East Fork to Meeks Cabin Reservoir (Recreational – History). The historic site on this river segment is wholly contained on private land, therefore eliminating this segments eligibility. The old Standard Timber Headquarters site was filed on and homesteaded. It is now part of the Henry Ranch Partnership holdings.

West Fork Smiths Fork: Source to Forest Boundary – The historic sites on this segment are located on private lands eliminating this segments eligibility. (Letter 53)

WCNF – Little Cottonwood Creek (LCC) does have some of the potentials for this designation. As discussed at Alta Town Meeting, that the LCC is defined as beginning at the confluences of Albion drainages and Grizzly Gulch, is this a Federally determined status USFS or Army Corps? or for ease of definition. One reason is that in my mind and possibly others is that the section of Snake Pit is quite scenic let alone wild and could be included in the discussion and possibly the entire section of creek from the Cecret Lake Falls, down might qualify from the educational basis of how a glacier lake and cirque creates a drainage/river.

... The other thought is that a Wild and Scenic designation could be applied as mentioned to the LCC from Snowbird down, one of my favorite hikes is along this section of creek from White Pine up to Baby Thunder Lift. (Letter 73)

WCNF – *Tentative Classification of Logan River Tributaries Wrongly Changed*

Our organization has also noticed that during the eligibility process several of the Logan tributaries classifications were changed from Wild to Scenic. After reviewing these changes, we feel several of these decisions were misguided.

White Pine Creek was determined as wild in the original wild and scenic river study, but was later reclassified as scenic. On the “Potential Classification” sheet initialed by TS (Tom Scott) and JH (Julie Hubbard) they answered the following questions, we believe, incorrectly.

- Essentially primitive, little or no evidence of human activity (NO)
There is only one higher use trail from Tony Grove Lake to access the upper reaches of White Pine Lake and White Pine Creek. This six mile round trip limits the human activity to a minimum and in no way be considered more than “little” human activity.
- Limited amount of domestic grazing or hay production (NO)
From what we understand there is limited amount of domestic grazing but isn’t substantial enough to disqualify the creek from being classified wild.

- Generally inaccessible except by trail (NO)
This is absolutely incorrect. The creek is only accessible by trail and speaks volumes of its qualifications for being designated wild.

Bunchgrass Creek was determined as wild in the original wild and scenic river study, but was later reclassified as scenic. On the “Potential Classification” sheet they answered all the questions with an affirmative (or eligible for wild classification) except for the following that we believe shouldn’t disqualify Bunchgrass from its rightful designation.

- Limited amount of domestic grazing or hay production (NO)
Again, we understand there is limited amount of domestic grazing but it isn’t substantial enough to disqualify the creek from being classified wild.

Spawn Creek was determined as wild in the original wild and scenic river study, but was later reclassified as scenic. On the “Potential Classification” sheet they answered the following questions, we believe, incorrectly.

- Essentially primitive, little or no evidence of human activity (NO)
There is only one trail leaving from an OHV trail to access the upper reaches of Spawn Creek. This trail sees limited use and therefore human activity is to a minimum and in no way can be considered more than “little” human activity.
- Limited amount of domestic grazing or hay production (NO)
Again, we understand there is limited amount of domestic grazing but isn’t substantial enough to disqualify the creek from being classified wild.
- Generally inaccessible except by trail (NO)
This is absolutely incorrect. There is an OHV route that parallels the creek from the mouth upstream for .4 of a mile and then leaves the drainage. The remaining 3.6 miles of the creek is only accessible by trail. If the FS were to adjust the boundary it would fit into the wild classification and provide the well-deserved protection.

Revisit Outstandingly Remarkable Values of Logan River and tributaries

Finally, we would ask that you revisit your justification for Outstanding Remarkable Values (ORVs) concerning these tributaries to the Logan River. Why can’t White Pine Creek CAN NOT BE considered to have an ORV for it’s scenic value? (Letter 112)

WCNF – High Creek: High Creek Lake to Forest Boundary – The upper portion of this segment is in the Mount Naomi Wilderness, and is worthy of the Wild classification in the eligibility list. However, the lower portion is within a non-Wilderness corridor and is very close to a system road (FR-048), a developed campground, and a trailhead. Due to the proximity to the road and developed facilities, the portion of this segment that’s outside the Mount Naomi Wilderness is inconsistent with a Wild classification. Also, any future improvements to these facilities could be severely hampered by a Wild designation of the lower portion.

Recommendations: Do not recommend the portion of the High Creek segment that is outside the Mount Naomi Wilderness for Wild & Scenic River designation with a Wild classification. A Scenic or Recreation classification is a possibility, but any recommendation should allow improvements to the trailhead, campground, dispersed campsites, and other facilities to meet future need. The portion within the Mount Naomi Wilderness should be recommended for Wild & Scenic River designation with a Wild classification. (Letter 156)

WCNF – High Creek: High Creek Lake to Forest Boundary – A road runs along a portion of this segment and thus cannot possibly be classified as “Wild.” (Letter 221)

WCNF – WWA is concerned over changes, from Wild to Scenic, that were made recently by the Forest Service to the classifications of the Logan tributaries. WWA questions the reasoning and methodology behind the changes to White Pine Creek, Bunchgrass Creek and Spawn Creek designations. This current management direction would allow a snowmobile connector trail to criss-cross three drainages. According to a July 2005 Forest Service scoping document the new trail would cover three drainages and

require, "...the cutting of trees and shrubs from an area approximately eight feet wide for about three and a half miles." Additionally, construction of three six to eight foot wide wooden bridges, two six feet long and one 40 feet long spanning White Pine Canyon, could be required. (Letter 106)

WSR 208 – Free flowing character.

Rivers should be defined as having actual water in them 12 months per year. (Letter 13)

No segment of any stream that is essentially dry for 6 months of every year due to upstream impoundments should be deemed suitable. (Letter 19)

The W&SR Act requires that a river be free-flowing. Although there is no minimum flow requirement, stream flows must be sufficient to create and maintain the ORV. It is our belief that some of the streams being considered by the USFS for Wild and Scenic River designation are ephemeral or have limited flows during certain periods of the year. We request detailed information regarding flow rates throughout the year for streams considered eligible for Wild and Scenic River designation. We also request information regarding the minimum flows necessary to create and maintain ORVs and stream flow analysis documenting required flows on a consistent basis. (Letter 79)

OPIC agrees with the State of Utah that water should be present and flowing at all times in order for any segment to be eligible for consideration for WSR. All segments are dependent on releases from reservoirs for flow. (Letter 157)

ANF – The general plan contains the following policies associated with Wild and Scenic Rivers, which are based on Utah State law codified at Section 63-38d-401(8). Duchesne County support for the addition of a river segment to the Wild and Scenic Rivers System shall be withheld until:

(i) it is clearly demonstrated that water is present and flowing at all times;

Several streams should not have been found eligible as there is not water flowing at all times due to existing impoundments (leaving streams essentially dry between mid-October to mid-April). A USFS Wild and Scenic eligibility document dated June 16, 2004 states that "A 70-100% reduction in flow would be considered a major modification and most likely not sustain ORVs being considered." In spite of the fact the W&SR Act does not bar the consideration of rivers with low dams, diversion works, and other minor structures, Duchesne County feels that such impoundments downgrade the ORVs of such streams and causes them to fail to meet Suitability standard #2 associated with existing water resource development. Streams in this category include Upper Whiterocks River, East Fork of the Whiterocks River, Shale Creek and the streams in Garfield Basin. (Letter 124)

ANF – Upper Whiterocks River: the UWCD states that this segment is "...dry much of the year due to impounding the water for much of the year and releasing it only during the irrigation season to satisfy legitimate water rights below". I would like to point out that even when the headgate from Chepeta is closed, there is still water in the Upper Whiterocks River. This water comes into it from the west.

West Fork Whiterocks River: the UWCD states that "included in the segment are lakes which hold irrigation water for lands lower on the Whiterocks and Uinta River." This implies that there are headgates on the lakes, but there are no headgates on any lakes of the West Fork, and flows from the lakes occur naturally.

Reader Creek: the UWCD states that the segment "is dry or flows very little water much of the year." I've never seen it dry and I've never heard of anyone else seeing it dry. My understanding is that Reader Creek is a very important fishery because of its relic population of Colorado River cutthroat trout. I remember fishing in Reader Creek as a young man and I remember it supporting a lot of trout. If the stream really was "dry or flowed very little water much of the year" I don't think it could support any kind of a fishery.

East Fork Whiterocks River: the UWCD states that the segment "begins at the outlet works of White Rocks Dam and is therefore dry much of the year..." When the outlet is closed the river is dry just below the dam, but as it moves away from the dam other feeder streams come into it and it has water. (Letter 200)

I feel that even though part of Ashley Gorge is dry part of the year the entire segment should qualify as a wild river. I hiked up the lower part of the gorge and found the area to be very wild in nature. (Letter 200)

ANF – Upper Whiterocks River – Chepeta Lake is located at the headwaters of this section and flows in the river are completely dry for up to eight months of the year or more. ... There is an area designated coming from Chepeta Lake that is dry-dammed from mid-October to mid-June in order to provide private irrigators their storage rights, and therefore the flows are already altered substantially by man's influence. (Letter 55)

ANF – DO not designate Upper Uinta River – the upper reach of Fox Lake identifies a stream segment from the high mountain divide lake down to Fox Lake yet this segment has extremely minimal flows (Less than a half second-foot for the majority of the year). Any designation upstream would stop the issued Colorado Ditch Bill easements. The segment shown below Fox Lake is normally closed from mid-October to early November. As it is dry-dammed for storage purposes with no water leaving the facility until normally mid-June to mid-July. (Letter 55)

ANF – In drought years Uinta River and Shale Creek would have very little flow for their fisheries if not for the releases from the reservoirs. (Letter 123)

ANF – Shale Creek tributary flowing out of Crescent Reservoir actually flows into Fox Reservoir Stream shown flowing into Fox Reservoir is intermittent – not free flowing. Discharge from Fox Reservoir is not free-flowing due to impoundment. (Letter 19)

ANF – UWCD agrees with the state of Utah that water should be present and flowing at all times in order for any segment to be eligible for consideration for WSR. Applying that criterion alone, the only segments located in Uintah County that would remain suitable would be the Middle White Rocks River and the South Fork Ashley Creek. However, much of the water conveyed by these two segments is regulated by upstream dams for irrigation in the valleys. All other segments located in Uintah County are either dependent on releases from reservoirs for flow or are located in areas where the water sinks into the underground “karst” system for much if not most of the year. (Letter 71)

ANF – South Fork Ashley Creek – This is one of the few segments that can meet the criteria of having water present and flowing at all times. During the summer months, however, some of that water comes from the release of water from storage reservoirs owned and operated by the Ashley Valley Reservoir Company. This segment would also be used in conjunction with any reservoir constructed in the Trout Creek area, the water right for which is currently held by Vernal City.

Black Canyon – This segment like several of the other segments does not have water present and flowing at all times. There are several places in the canyon where the water sinks into an underground system leaving the streambed dry except during the high flows of spring runoff. Mention is made of Colorado Cutthroat, rainbow, and brook trout being present. There may indeed be some short stretches in the canyon where ponds formed during high water would allow these fish to exist but because of the nature of this and other streams in the area where the water sinks and sometimes reemerges later, a vibrant fishery is not likely to be maintained. (Letter 71)

Ashley Gorge Creek – This segment is along the main stem of Ashley Creek and conveys most of the water used in the Ashley Valley for irrigation, municipal and industrial uses. Black Canyon and the Ashley Springs join the main stem of Ashley Creek in this segment. Releases from Oaks Park reservoir, Long Park, Ashley Twins, and Goose Lakes flow through this section and are regulated to provide irrigation water during the latter part of the irrigation season. The releases of this water are a very important part of a complex exchange system of water in the Ashley Valley. They provide water for exchange for water users above the Steinaker Service Canal. Several municipalities also hold shares of this water. The Lower Dry Fork Creek, Black Canyon, and the South Fork Ashley Creek segments and the corresponding drainages combined with this Ashley Gorge Creek segment provide virtually all of the water used for municipal, industrial, and irrigation purposes in the Ashley Valley. Even though this segment conveys much of the

Valley's water, there are times and sections of even this segment that do not have water present and flowing at all times. As the flows diminish during dry periods or later in the summer, there are areas along this segment where the water sinks into the ground leaving a dry stream bed. Water from the reservoirs listed above provide additional flows during the late summer period and therefore there are less of these dry streambed areas than would exist if only the natural flows were present. (Letter 71)

MLSNF – It has come to our attention that there are two reasons why these 23 river segments on the Monticello Ranger District were dropped from eligibility: classification as ephemeral and lack of regional significance.

The decision by the MLSNF, upon the advice of the Intermountain Region, to not consider ephemeral rivers is an example of the arbitrary nature of this process. The Wild and Scenic Rivers Act (*P.L. 90-542, as amended; 16 U.S.C. 1271-1287*) does not state that river segments can only be eligible if they are intermittent or perennial.

...Each of the river segments originally considered eligible for designation by the MLSNF on the Monticello Ranger District qualifies under the Act's classification. The Act does not specify that a specific 'quantity' of water, nor a specific 'time of year' that water would be included. The definition of "free-flowing" is specified as "free of impoundments." As such, the MLSNF's decision, again without opportunity for comment by the public, to create designations of "ephemeral," "intermittent" and "perennial" which were then used to remove segments from eligibility, is arbitrary and capricious. This is especially notable when segments such as Whiskers Draw, are of such unique cultural value that their inclusion should be obvious. The development of the rating system that has been used in this process demonstrates that the MLSNF is missing the entire intent of the Act. The architects of the Act recognized that watercourses are primarily the first to be impacted by development, which is so very true in a desert environment. As such, the Act seeks to recognize that river segments which "possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values" need to be protected. Regardless of how much water is flowing through the river segment at any particular time of the year. (Letter 70)

MLSNF – What river segments being studied do you think make worthy additions to the national wild and scenic rivers system and why?

...None – None of these are year round streams. All pretty much flow when it rains. (Letter 244)

....None of them being considered in San Juan County should be made wild and scenic. Because there are no wild and scenic being considered. At best they have streams or creeks that run at certain times of the year. But they are not rivers. The intent of the wild and scenic rivers act was to protect the major free flowing rivers like the Colorado, Missouri, Snake, etc. Please don't concoct some occasional running streams into rivers to satisfy the whims of special interest groups under the guise of protecting cultural resources. (Letter 245)

...None of the segments being considered in the Monticello Ranger District in San Juan County should be considered. Why, because there is no running water in any of them with the exception of flash flooding. It is usually dry by the next day or so. (Letter 256)

MLSNF – Nothing on the ground in the four areas being considered has changed since these areas were declared ineligible in 2006. All that has changed is the political climate. There are no free flowing rivers in these areas so there is no need for wild and scenic designation. (Letter 245)

MLSNF – Leave as it is now wild. The four listed areas in the Monticello Ranger District are in no way flowing rivers. When there's a flash flood you may be able to ride your log down and there are no fish. (Letter 255)

MLSNF – I am a residence of San Juan County and have been to several of the places that are of interest in this Act. The first, comment I would like to make is that, I believe that in some areas across our nation this particular Act is in deed needed to protect the rivers that do make this nation a beautiful place to live.

However, I feel that is act has been misconstrued to fit the so called rivers of San Juan County. I have been to most of the places questioned in San Juan County and I believe that most of them do not have perennial water that flow there. Some would say that they are not perennial due to the drought that San Juan County has been in for past years, but I believe even during good winter with plentiful water, these rivers are still not perennial. When tourists come into those areas they have to pack their own water to support themselves while they are here. (Letter 261)

MLSNF – I would like to comment on rivers in San Juan County. Your brochures and other handouts regarding these rivers are misleading if not outright lies. You show pictures of rivers with water in them while the “rivers” on your list being studied in San Juan County are dry creek beds most of the year and only met Webster’s definition of a river (stream of water of considerable volume) after a large rainstorm (which is rare). You are misleading the public and those unfamiliar with the area. (Letter 247)

MLSNF – 1) I support San Juan County's position on these proposals.
2) These are not by any reasonable definition "rivers". Considering WSR designation for mostly dry creek beds smacks of a politically motivated bureaucracy run amok. (Letter 258)
... I have been to some of these areas specified and I agree with San Juan County positions. Webster’s Dictionary: River: Large natural stream of water. (Letter 253)

MLSNF – San Juan County does not support Hammond Canyon as suitable for inclusion as a Wild and Scenic River. Water is probably no more important anywhere in the West than it is in this very dry area. Anyplace there is any water there are numerous interests in obtaining it for culinary, irrigation, stock water or any number of uses of water. The very fact that there is no interest in or filings for water in this drainage demonstrates that there simply is not any water here. The question begs to be answered - How can there be a Wild and Scenic River where no water exists? (Letter 252)

MLSNF – Hammond Canyon has no free flowing water. Is at least ¼ mile across and is over 1000 feet deep in the middle to the res. Hammond is scenic and accessed by foot trail. Leave alone.

Chippean and Allen Canyons are so wide and vast areas that will never need management. Let go wild. Upper Dark Canyon has two good springs, but has no free flowing character. Horse Pasture is just grassy flat....Chippean and Allen Canyons are not deep canyons and are side draws and have no running water for any distance.

Lower Dark Canyon is very deep and has no free flowing character. Is accessed only by foot trail and has water pockets in spring.... Lower Dark Canyon is wide and deep from Rig Canyon to where it leaves the forest and goes into BLM. No running water. There is a spring of water where Woodenshoe joins Dark Canyon and that is all the live water in the canyon.

All the area of Upper Dark Canyon is wide and open canyons with small springs and no running water. Horse Pasture is a wide grassy valley and has had noxious weed growth in the upper end.

Peavine & Kigalia canyons are also wide open with no running water. (Letter 256)

MLSNF – On behalf of Monticello City, my constituents and myself, I would like to make the following comments. First, I maintain that many residents of Monticello are not opposed to the designation of rivers and streams as wild and scenic rivers as long as these rivers and streams truly qualify under the Act and are appear worthy of such designation. However, in this latest proposal on suitability from the Forest Service, many of my constituents are having a hard time squaring the idea that occasional streams/ streambeds, that do not have perennial water, can be deemed suitable as wild and scenic rivers. They simply do not believe that periodic streams, with sporadic water flow, such as Upper Dark Canyon, Lower Dark Canyon, Hammond Canyon, Chippean and Allen Canyon qualify as wild and scenic rivers. (Letter 260)

MLSNF – Segments on the Monticello Ranger District (Upper and Lower Dark Canyon, Hammond Canyon, and Chippean and Allen Canyon) have very little water except during high intensity thunderstorms... It is

inconceivable that Congress envisioned designating Wild and Scenic Rivers where you had to carry water to have enough to drink. (Letter 252)

MLSNF – Hammond Canyon, Chippean & Allen Canyons – these are not free flowing rivers. The only access is a road in Allen Canyon to access private property. Upper Dark, Horse Pasture, Peavine, etc. are wilderness already. None of them have a free flowing river in them.

Basically all that is on the list in Monticello District are already protected from what I don't know. Nature has seen to it by the nature of the landscape to make it wilderness! I believe it should be left as is! In regards to areas in Monticello District I don't see how they qualify.

They are not free flowing rivers. There is no access other than foot, except Allan canyon. Most of it is already in wilderness.

There is no development and probably never will be.

There is only water in these drainages for a short time in the spring. (Letter 255)

WCNF – Beaver Creek - A diversion on Shingle Creek sends water to either the Provo River or Beaver Creek. District is opposed to any action that would result in a change to current diversion practice. (Letter 142)

WCNF – Do not designate Ostler Fork – only a minor tributary to Boundary Creek. The stream dries up during some months. It dumps into Still Water Fork. (Letter 54)

WCNF – Provo River: Trial Lake to U35 Bridge – Flow releases cause unnaturally high flows in the river from July to Sept. The Duchesne tunnel can divert as much as 600 cfs into the Provo midway during spring runoff. (Letter 142)

WSR 210 – Regional or national significance of ORVs.

The general plan contains the following policies associated with Wild and Scenic Rivers, which are based on Utah State law codified at Section 63-38d-401(8). Duchesne County support for the addition of a river segment to the Wild and Scenic Rivers System shall be withheld until:

(ii) it is clearly demonstrated that the required water-related value is considered outstandingly remarkable within a region of comparison consisting of one of the three physiographic provinces in the state, and that the rationale and justification for the conclusions are disclosed;

It has not been demonstrated in Duchesne County that appropriate regions of comparison were used during eligibility. (Letter 124)

In order to be assessed as outstandingly remarkable, a river-related value must be a unique, rare or exemplary feature that is significant at a comparative regional or national scale. The Counsel's report cited dictionary definitions of the words "unique" and "rare" as indicating that such a value would be one that is a conspicuous example from among a number of similar values that are themselves uncommon or exemplary. If the Colorado Plateau is the area of comparison the segments should be considered as the best of the best compared to the 252 miles of river segments recommended for Congressional designation within the GSENM which is within close proximity to the USFS's eligible segments. Best of the best comparisons should also include comparisons to similar river segments in Zion National Park, The Glen Canon NRA and, of course, the Grand Canyon NP. The EIS should also consider the 165 miles of wild and scenic river designations proposed in the Washington County land bill along the North Fork Virgin River and its segments. No such comparisons were made in determining that additional segments are outstandingly remarkable, regionally significant, unique and rare in comparison to the plethora of such streams, creeks and rivers in the area. It would appear that not all of the hundreds of down cutting streams and creeks caused by the uplift of the Colorado Plateau could meet the minimum threshold requirements of the Wild and Scenic Act. To put it simply; how many short segments of down cutting streams and creeks within Kane County and the immediate area qualify as outstandingly remarkable, regionally significant, unique and rare? How

many require protection since they are under no threat of river, stream or creek corridor development. Was it the intent of Congress in passing the Wild and Scenic Act to designate thousands of short stream and creek segments throughout the West as part of the Wild and Scenic River System? Or, was it congressional intent to protect only “some of the nation’s most precious rivers?” (Letter 109, 110)

ANF – Green River - we have vacationed along the Green, both up in the Uinta basin and in the segment from Desolation Canyon down to the confluence with the Colorado. It is a nationally valuable river. (Letter 226)

DNF – East Fork Boulder Creek; Slickrock Canyon; Cottonwood Canyon; The Gulch; Steep Creek; Pine Creek; Mamie Creek; Death Hollow Creek, (Garfield County): – These segments are part of a set of seven streams flowing off of the Aquarius plateau into the Escalante river. We question the regional significance of any of the segments. Streams with similar attributes are located across the Colorado Plateau. It is doubtful that specific outstandingly remarkable values can be identified that do not also exist on the Manti-La Sal in San Juan county or similar plateaus in Colorado, New Mexico or Arizona. (Letter 122)

DNF – Moody Wash, Washington County – The ecological and fishery values identified are not unique to Moody Wash. Most streams at similar elevations in the Virgin River watershed exhibit the same values. These values do not merit identification as significant at a regional or national scale. (Letter 122, 149, 268)

DNF – We disagree with the finding that Moody Wash exhibits characteristics that make this stream segment any different than many other desert riparian systems in the region. (Letter 268)

FNF – Millard County is opposed to designation of Corn Creek because we do not see any regional significance. (Letter 217)

MLSNF – Eligibility Criteria – Geographic Significance – Upon review of the Supplement, as well as further conversations with MLSNF Staff (personal communication, Ann King, 6/4/07), it is clear that the segments that were not dropped for stream class were dropped because they were reevaluated and not considered ‘regionally or nationally significant.’

In *Wild and Scenic River Review in the State of Utah* (7/96), when addressing eligibility, page five, under Regionally significant, second paragraph: “Comparative regions should not be so large as to unreasonably limit outstandingly remarkable rivers to only those few that stand out as the very best in the nation...” Such guidance would preclude the concept of comparing rivers and watercourses on the Colorado Plateau with Grand Canyon National Park. Ironically, in the 2003 Final Report, all of the Monticello Ranger District river segments rated high on regional/national significance, despite the fact that they were in the same ‘region’ as the gems of our nation. Yet, with a second look, the MLSNF changes that evaluation, and suddenly these segments are all out of consideration for that very same reason.

It seems more logical to create a region that would be appropriate to the guidance above, as well as the process. One possibility is that since this is a process that is only considering river segments in Utah, the state boundary is an appropriate region of comparison. Or the boundary could be the Wasatch Plateau, which separates the Great Basin from the Colorado Plateau. (Letter 70)

MLSNF – In Wild and Scenic River Review in the State of Utah (7/96), when addressing eligibility, page five, under Regionally significant, second paragraph: “Comparative regions should not be so large as to unreasonably limit outstandingly remarkable rivers to only those few that stand out as the very best in the nation...” Such guidance would preclude the concept of comparing rivers and watercourses on the Colorado Plateau with Grand Canyon National Park. Such remarkable geologic features as the Wasatch Plateau, which separates the Great Basin from the Colorado Plateau, create a region that would be appropriate in considering each watercourse. Since many of these segments rated high on a national scale it is difficult to believe that removing so watercourses from Wild and Scenic River Act consideration could be justified. (Letter 117, 70)

MLSNF – Until some rivers or watercourses on the Manti-La Sal NF are designated under the Wild & Scenic Rivers Act, all of them remain remarkable examples of unprotected rivers of regional and statewide importance. Until such time as some rivers receive designation as Wild, Scenic, or Recreational Rivers, all potential rivers remain highly important examples of rivers in the region as well as the state. Discounting the significance of all or any such examples cannot be done until some examples receive designation under the Wild & Scenic Rivers Act. (Letter 70, 117)

MLSNF – The guidance also consistently lumps the Abajos into a region of significance with the Grand Canyon. (See Section V Appendices, p. 170 for an example.) This is an absurd region of comparison since the Grand Canyon is geologic area and formation of global significance. The Abajo, La Sal, Henry, Ute and Navajo Mountains are an incredibly significant region on their own. Each is an island of forests and peaks separated from any and all similar areas by deep river chasms, intricate canyon systems, slickrock and desert valleys and canyons. Water is a rare quality in all of these ranges. Seasonal, intermittent, or perennial watercourses should all be closely evaluated for the minimal protection provided by the Wild and Scenic Rivers Act. We would concur that if the Abajos remain in the region of significance with the Grand Canyon, then the Abajos also rate evaluation as a National Monument or National Park and should not be left to the vagaries of resource extraction and continued motorized development for their future. (Letter 70, 117)

MLSNF – Huntington Creek and Huntington Creek Left Hand Fork – The outstandingly remarkable values are not nationally significant. When viewed from a national perspective, this segment falls short of a national standard. (Letter 77, 78)

MLSNF – Emery County does not consider Lower Left Fork of Huntington Creek a worthy addition because: The ORVs which make the segment eligible for inclusion are not of national significance. The segment is five miles long, includes a USFS campgrounds at the lower end and the Left Hand Fork, National Recreation Trail lies within the entire length of the segment. The nominated segment is similar to many streams on the Manti-La Sal and in the west, and is no outstandingly remarkable. (Letter 153)

MLSNF – Salt Creek – The portion of Salt Creek within the Forest boundaries forms the headwaters for the only perennial stream in Canyonlands National Park. For that reason Salt Creek is significant nationally. The views from the slopes of the canyon look over the incredible rock formations surrounding Salt Creek. The portion of Salt Creek within Canyonlands NP is essentially managed as wilderness above Peek-a-Boo Springs. The study of Salt Creek for Wild designation would only enhance the qualities that make Salt Creek a crucial part of Canyonlands Basin. (Letter 70, 117)

MULTIPLE – I urge that each of the following streams be designated as a National Wild River, as each such segment of water presents attributes of national significance:

Ashley National Forest – Middle Main Sheep Creek; Lower Main Sheep Creek; Carter Creek; Cart Creek Proper; Green River; Pipe Creek; Upper Whiterocks River; West Fork Whiterocks River; Reader Creek; East Fork Whiterocks River; Middle Whiterocks River; Lower Dry Fork Creek; South Fork Ashley Creek; Upper Uinta River; Center Fork; Shale Creek and all tributaries; Black Canyon; Ashley Gorge Creek; Upper Rock Creek; West Fork Rock Creek; Fish Creek; Fall Creek; Oweep Creek; Upper Lake Fork River; Ottoson Creek; East Basin Creek; Upper Yellowstone Creek; Mill Creek; Garfield Creek; Gilbert Creek; Painter Draw

Dixie National Forest – North Fork, Virgin River; East Fork Boulder Creek; Slickrock Canyon; Cottonwood Canyon; The Gulch; Steep Creek; Pine Creek; Mamie Creek; Death Hollow Creek; Moody Wash.

Fishlake National Forest – Salina Creek; Fish Creek; Corn Creek; Pine Creek; Bullion Falls; Manning Creek
Manti-La Sal National Forest – Miners Basin; Mill Creek Gorge; Roc Creek; Huntington Creek; Fish Creek; Gooseberry Creek; Lower Left Fork of Huntington Creek

Uinta National Forest – North Fork, Provo River; South Fork, American Fork River; Little Provo Deer Creek; Fifth Water Creek

Wasatch-Cache National Forest – Henry’s Fork; Henry’s Fork Lake; West Fork Beaver Creek; Middle Fork Beaver Creek; Beaver Lake; Thompson Creek; Hoop Lake; West Fork Blacks Fork; East Fork Blacks Fork; Little East Fork; Blacks Fork; West Fork Smiths Fork; East Fork Smiths Fork; Red Castle Lake; Hayden Fork; Stillwater Fork; Ostler Fork; All Forks of the Bear River; Alsop Lake; Norice Lake; Boundary Creek; High Creek; High Creek Lake; Blacksmiths Fork; Logan River; Beaver Creek; White Pine Creek; Temple Fork; Spawn Creek; Bunchgrass Creek; Little Bear Creek; Little Bear Spring; Main Fork Weber River; Middle Fork Weber River; Provo River; Trial Lake; Ogden River; Willard Creek; Red Butte Creek; Little Cottonwood Creek

To fully preserve all streams from source to mouth. (Letter 159)

WSR 212 – Water rights.

Implementation of wild and scenic river management must honor existing water rights and water rights must not be used or forfeited for “ORVs.” (Letter 221)

There is very little if any unsubscribed water in any of these segments.

UWCD and OPIC is concerned that the holders of legitimate water rights will have those rights altered and/or manipulated to satisfy future “unintended and/or unforeseen “needs” of a segment designated as Wild and Scenic.

UWCD and OPIC is concerned that the water resource would indeed be curtailed or foreclosed. (Letter 71, 157)

UWCD and OPIC expresses concerns over the suitability of these proposed segments for inclusion as National Wild and Scenic Rivers. As stated previously most of these segments do not have water present and flowing at all times. Much of the water in those segments that do have water present and flowing at all times is regulated water from reservoirs higher in the river system. Those waters are stored and released to meet the legitimate water rights of irrigators and other water right holders lower in the system. Any re-regulation and/or interference with that water and the related water rights would have a detrimental if not devastating effect on the economy of the communities in the valleys below. Any change to the management of this water would affect the farming activities and the water resource management efforts in the area. (Letter 71, 157)

What rivers make worthy additions? River segments within wilderness area yet waters should always flow and steps taken in these Wild and Scenic rivers to ensure that farmers and other owners of water rights can always receive water under their rights. (Letter 82)

While the USFS contends that no off segment impact would likely occur, water-related projects proposed outside the segment could be precluded if they would invade or unreasonably diminish scenic or recreational values within the designated segment. Planning could restrict future uses of forest lands outside the segment if local forest management deems the use of state water rights or other projects potentially impact wild and scenic values within the segment. This condition creates economic and property rights issues that should be fully addressed prior to suitability determinations.

There is no guarantee or even an assurance that these protection and enhancement goals will not restrict future uses of federal, state and private properties off the designated river segment. Private water rights issued and regulated under provisions of state law could be threatened within the designated segment as well as up stream or down stream of the segment. (Letter 109, 110)

Historical and existing water rights, canal system, storage facilities and watershed are subjects that were not considered in the eligibility process that must be fully analyzed and impact disclosed in the suitability process. For example, streams who’s flows are totally dependent on releases from storage of down stream water rights were determined to be eligible without analysis. Water rights, historical and existing uses, planned development, development under consideration and future water development needs must be reported, analyzed and impact of WSR designation disclosed. (Letter 148, 211)

The implementation of wild and scenic river management must honor state water right priorities and processes. We strongly oppose any efforts to establish federal reserved water rights for the purpose of managing outstandingly remarkable values. (Letter 122, 149)

Emery County also advocated the position that water rights, water management and water use are governed by state law, and that federal manipulation of this resource outside the state water law is not legal. (Letter 153)

As a cumulative action and impact the EIS must also fully discuss and disclose existing water rights and their effect on water flows and suitability of the river segment for designation. 40 C.F.R. §1508.25(a)(ii). (Letter 165)

Need to Involve Affected States and Quantify Existing Water Rights on Affected Segments

As the Forest Service study documents readily disclose, classification even without legislation will interfere with storage and diversion structures within the river corridors as well as upstream diversions that affect flows.

The WSRA is subject to existing rights. 16 U.S.C. §1271. A water right conveys not only the right to use the water but the right to divert the water, because diversion or storage are essential components of beneficial use. *Green v. Chaffee Ditch Co.*, 150 Colo. 91, 371 P.2d 775 (1962). The federal agency cannot purport to deny the necessary right-of-way for a diversion structure without violating its obligation to respect valid existing rights. Indeed, the Forest Service has previously granted rights-of-way in wild river corridor for storage and diversion. *Trout Unlimited v. U.S. Dept. of Agriculture*, 320 F. Supp.2d 1090 (D. Colo. 2004) *on remand to agency* (expansion of storage on Cache la Poudre River).

Classification as a wild, scenic or recreation river cannot be proposed without failing to respect valid existing rights. Since the Act requires protection of valid rights, this study must as well.

Oppose designation that would infringe on water delivery and storage in high Uintas (Letter 142)

Water conservancy district wants to keep current water delivery and management operations the same. (Letter 142)

Opposed to any designations below existing diversion structures and are concerned with year-round flows which might be required which would infringe on water rights. (Letter 164)

The materials under review (DEIS) are largely silent on the subject of federal reserved water rights that might accrue to any future Congressional designations into the National Wild and Scenic System. The Utah State Engineer believes the evaluation of the possible effects of federal reserved water rights on future water use opportunities must be evaluated within the EIS.

The State Engineer also suggests, for each of the stream reaches determined to be suitable, a discussion be included regarding the federal reserve water right to be sought for each reach. Also, the analysis should consider likely impacts such a water right will have on the reach itself and the watershed above and below said reach. Impacts to be addressed should include, but not be limited to: hydrologic changes, socio-economics, water rights administration, development potential, future restrictions on water management practices, and the requirements to be met if a water user desires to change their point of diversion to facilitate water distribution. Most importantly, a justification should be given that the amount of water claimed under the federal reserved water right does, in fact, help to fulfill the purpose of the reservation and is scientifically defensible. (Letter 266)

ANF – Lake Fork, Yellowstone, Uintah Rivers a Shale and Garfield Creeks Dry Gulch Irrigation Company has water rights. (Letter 123)

ANF – Upper Whiterocks River – This segment begins at the outlet works of Chepeta Dam and is therefore dry much of the year due to impounding the water for much of the year and releasing it only during the irrigation season to satisfy legitimate water rights below. We are concerned that the water rights that allow this impoundment and release would be curtailed or foreclosed if approved.

West Fork Whiterocks River – This segment begins at the Fox/Queant Pass. Included in the segment are lakes which hold irrigation water for lands lower on the Whiterocks and Uinta Rivers. We are concerned that the water rights would be curtailed or foreclosed if approved.

Reader Creek - This segment begins at the Reader Lakes and is dry or flows very little water much of the year. We are concerned that the water rights would be curtailed or foreclosed if approved.

East Fork Whiterocks River – This segment begins at the outlet works of White Rocks Dam and is therefore dry much of the year due to impounding the water for much of the year and releasing it only during the irrigation season to satisfy legitimate water rights of the Ouray Park Irrigation Company below. We are concerned that the water rights that allow this impoundment and release would be curtailed or foreclosed if approved.

Middle Whiterocks River - This segment is only in Uintah County for a short 0.15 miles and does not have any impoundments along its length. It does, however, convey water from Chepeta, Cliff, and White Rocks reservoirs to irrigated lands lower on the river system. Due to these impoundments, flows in this segment are artificially regulated to meet the legitimate water rights of users further down the river. We are concerned that the water rights that allow this impoundment and release would be curtailed or foreclosed if approved. (Letter 71)

ANF – Middle Whiterocks River – OPIC delivers water from two reservoirs through this segment water from Cliff and White Rocks reservoirs are delivered through this segment for OPIC along with water from Chepeta for White Rocks Irrigation Co. which we as farmers and ranchers depend on for our livelihood and if anything was to affect the delivery of this water it would have a devastating impact on us. Flows in this segment are artificially regulated to meet our legitimate water rights. We are concerned that the water rights that allow this impoundment and release would be curtailed or foreclosed if approved. The tentative classification is scenic even though the description of the Scenic Value has more to do with the surrounding area than it does with the segment and the segment's corridor. One of the Scenic items mentioned as visible from this segment is the Cliff Lake Falls which would not exist were it not for Cliff Lake Reservoir. (Letter 157)

ANF – East Fork Whiterocks River - This segment does not have water in it most of the year due to OPIC storing water in White Rocks Reservoir and releasing it only during a short period of time during the irrigation season. This segment should be taken off the list due to being dry most of the time. We have a major concern that our water right that could be affected and possible full use of this reservoir could be put in jeopardy if this section is placed on the WSR. As we look at the Final Eligibility Determination of Wild and Scenic Rivers it shows that it does not qualify as Wild Scenic or Recreational. (Letter 157)

ANF – Upper Whiterocks River, East Fork of the Whiterocks River, Shale Creek, Upper Uinta River and many other watercourses listed in the suitability document (titled: Utah Division of Water Rights Response to the Eligible Watercourses for Suitability Study in the Wild and Scenic Rivers Designation Process as defined by the Wild and Scenic Rivers Act of 1968). Many of the proposed designations listed currently affect streams that are dry typically between mid-October and mid-June so irrigation water can be stored for the following irrigation season. When that stored irrigation water is released to downstream irrigators, the flows are significantly altered by man and increased above natural flows to meet the irrigator's water rights. DCWCD would like to emphasize that existing valid State of Utah water rights are already in place for Chepeta Lake, as well as other Uinta High Mountain lakes and reservoirs, and are utilized by owners for various beneficial uses according to state water law. Any decision must protect their legal rights from any infringement. It is of concern to DCWCD that if designate, then flows year-round might be required, thus infringing on state and private water users' rights.

The above paragraph also applies to East Fork of Whiterocks River – Flows from Whiterocks Lake are also part of the East Fork of the Whiterocks River and the flows in this section of the river are stored consistently for at least six months of the year. It should be declared ineligible. Lower Whiterocks River – privately owned property is located within this section and because of interference with private property rights this section should not be considered eligible. Upstream water rights should be protected from interference which would force irrigation companies to release water to this segment for any purpose other than exercising their water rights. (Letter 55)

DNF – Do not designate East Fork of Boulder Creek, from below the rim of the escarpment on Boulder Mountain to King’s Pasture Reservoir on Dixie NF, because it will confer a junior water right to the USFS, which will invite attention and more litigation. There are other ways to preserve it without having a water right attached. (Letter 21)

FNF – Millard County is opposed to designation of Corn Creek because designation would cause more harm and problems with local water rights. (Letter 217)

FNF – We oppose the designation of Salina Creek for the following reasons: since the water rights are all subscribed, there may need to be an ongoing access to maintain flow of the waters. (Letter 126)

FNF – We oppose the designation of Fish Creek for the following reasons: since the water rights are all subscribed, there may need to be an ongoing access to maintain flow of the waters. (Letter 126)

MLSNF – Wild and Scenic designation of Fish Creek would jeopardize the water rights balance within the Price River system. (Letter 125)

MLSNF – Any WSR suitability study should take into consideration and provide for the Narrows Project. Forest lands within the Narrows Project are subject to the first form withdrawal made by the BOR in 1941. The WSR study should also consider and provide for the underlying water rights that support the Narrows Project and which are held by SWCD. Any reserved water rights claimed by the U.S., including the USFS, are subordinate and junior to SWCD’s rights per July 1989 stipulation between SWCD and the U.S. Department of Justice. Consequently, the WSR suitability study should provide for development of the Narrows Project.

...In the early 1990s, Sanpete interests and the U.S. Department of Justice entered into an agreement wherein the USFS ceded all of its federal reserved water rights claims in Gooseberry Creek. There is no legal predicate for a WSR finding of suitability absent a senior federal water right. The stipulation makes it clear that there is no such right. The NWSR Act does not allow a river to be designated unless there is enough water right to support the designation.

...The NWSR Act was passed to protect watercourses where unappropriated water of federal reserved water supported certain ORVs. The NWSRA is much more limited depending on the federal government actually owning a water right. Only in very limited instances can Congress condemn a water right to support a NWSR designation.

In 2003, the Manti-La Sal NF found Gooseberry Creek to be “eligible.” The main ORV was wildlife habitat for birds, elk, and bear.

Sanpete protested this finding and asked the forest to clarify its intentions and position. The USFS responded stating the USFS would recommend Gooseberry Creek be maintained; and might require additional mitigation from Sanpete as part of the environmental approval process for the BOR loan. Sanpete County believes the USFS’s position was illegal. In Gooseberry Creek, the federal government has ceded its water right, so what right can support a designation? None. The same is true for satellite obligations, such as “mitigation,” that the USFS suggests might apply. The Act imposes no such obligations. (Letter 222)

MLSNF – The Left Fork of Huntington Creek had four privately owned reservoirs at its head. Water rights flowing from these reservoirs and passing through Left Fork to Huntington Creek are administered as shares in the HCIC. Approx. 1/3 of those shares are owned by PacifiCorp for industrial use. Municipal and agricultural uses comprise the balance of those shares.

Huntington Canyon drainage is overappropriated. In a normal water year there are more water rights than there is physical water. (Letter 163)

MLSNF – Do not designate Huntington Creek. Concerned that the Federal Wild and Scenic River Act will create federal water rights and force minimum flow restrictions on Huntington Creek segments designated. (Letter 18)

MLSNF – Huntington Canyon and Huntington Creek Left Hand Fork – Implied stream water rights (junior or not) are non-existent where all rights have been appropriated. (Letter 77, 78)

MLSNF – San Juan County does not support Chippean and Allen Canyons as suitable for inclusion as a Wild and Scenic River.

The two sections of private land near the upper reaches of Allen Canyon have water rights which are currently being used for irrigation of these lands. These lands were homesteaded prior to the establishment of the Forest Service. The owners of these private lands want to continue the current use of the lands and water. They are strongly opposed to any wild or scenic river designation which would restrict or change the status of the land or water use.

Current water rights in Allen Canyon include two water rights in the name of West Mountain Irrigation Company equaling 7.25 cfs of water, and one right for the USA Indian Service for 1.06 cfs of water. The priorities range from September 7, 1923 to July 17, 1989. In conjunction with these rights, water is diverted out of Allen Canyon very near its headwaters and delivered to an irrigation reservoir and subsequently to the private land. These parcels are commonly referred to as the Bayles Ranch.

Blanding City has long had plans to use water from Allen Canyon in its culinary water system. If these canyons were designated as wild and scenic rivers, the infrastructure to deliver water to Blanding City would not be possible. This would severely limit the potential for growth and development in Blanding. The White Mesa Ute Indians also have water rights and use water from Allen Canyon as well as that in South Cottonwood. Designation as a Wild and Scenic River would have a negative impact on this right and use. Strong opposition can be expected from Blanding City and the White Mesa Ute Indians to any action which would restrict or eliminate their use of this water.

There are no federal reserved water rights to support a Wild and Scenic River Designation. Although the amount of water in these drainage's is small, it is essential to the private landowners to conduct their operations. Likewise it is very important for future growth of Blanding city. Designation of a Wild and Scenic River and the resultant taking of the water would be devastating to private land owners, White Mesa Ute Indians, and Blanding City. (Letter 252)

MLSNF – San Juan County does not support Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River.

The water rights on Mill Creek are decreed beginning in 1899, and with priorities of use earlier than 1891. All of the decrees and subsequent applications amount to 63.00 cfs of water. There is an application in the name of the Utah Board of Water Resources for 12,450 acre-feet, which has not been approved. The diversions range from Oowah Lake on the LaSal Mountains, to Lower Mill Creek west of Moab. One diversion is to Kens Lake which is critical to Moab for irrigation and culinary water. Anything that affects the water from Mill Creek is critical to the current survival of Moab as well as future growth.

...Water rights and diversions from Mill Creek are also at issue. All water is under water rights some dating as early as 1891. There are no federal water rights in Mill creek. (Letter 252)

MLSNF – San Juan County does not support Chippean and Allen Canyons, Hammond Canyon, Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons, Upper Dark Canyon,

Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons, and Mill Creek Gorge as suitable for inclusion as a Wild and Scenic River. No contributions to other regional objectives/needs could be identified by the San Juan County Public Lands Council. Wild and Scenic Rivers goals conflict with existing priority water rights. (Letter 252)

MLSNF – San Juan County does not support Lower Dark Canyon, Including Poison, Deadman, Trail, Warren, Woodenshoe & Cherry Canyons or Upper Dark Canyon, Including Drift, Horse Pasture, Rig, Peavine & Kigalia Canyons as suitable for inclusion as a Wild and Scenic River. There are no federal reserved water rights to support a Wild and Scenic River Designation. (Letter 252)

UNF/WCNF – PRWUA is entitled to use the storage capacity of Deer Creek Reservoir, together with the total yield of storage water from the Deer Creek Reservoir. PRWUA holds a permanent right to the exclusive use of the water made available by the Provo River Project (PRP) under the PRP water rights standing in the name of BOR.

...The PRP Duchesne River drainage rights (including the right to divert Little Deer Creek water) are junior, direct flow rights. There is no right to store water, and no storage facility above the inlet portal of the Duchesne Tunnel. Most of the Duchesne River drainage water that is available to the PRP is available during spring runoff when the natural flow of the Provo River is at or near its peak. Any Duchesne River drainage water which is not diverted, when available to the PRP, is lost to the PRP.

...certain PRP facilities are also used for the benefit of the Bonneville Unit of the Central Utah Project (BU). ...Because of the relative priorities of PRP and BU water rights, any reduction in the amount of Duchesne River drainage water diverted and stored by PRWUA may result in a reduction of Provo River water diverted and stored under BU water rights. (Letter 218)

UNF/WCNF – It is unclear whether any proposed designation will interfere with the diversion and conveyance of water from the Duchesne River drainage or the Weber River drainage by PRWUA under Provo River Project (PRP) water rights. PRWUA is concerned the LEIS may support an attempt to curtail diversions into the Duchesne Tunnel or the Weber-Provo Diversion Canal, or to limit the flows conveyed by means of the Provo River Channel between the outlet (west) portal of the Duchesne Tunnel and Jordanelle Reservoir. There is no storage on the Duchesne River upstream of the inlet portal of the Duchesne Tunnel. Diversions into the Duchesne Tunnel are based on the available direct flows up to the capacity of the tunnel. Any water which is available to the PRP, and which is not diverted, flows on downstream and is lost to the PRP and the water users who depend on the PRP.

...In connection with the Provo River Channel Revision of the PRP, extensive flooding and diking easements were acquired on private lands along the Provo River from Pine Valley to Deer Creek Reservoir and the carrying capacity of the Provo River Channel increased to transport the maximum divertible flows of the Duchesne and Weber Rivers to Deer Creek Reservoir. Maximization of diversions and storage of Weber and Duchesne River drainage water was the primary purpose of the Provo River Channel Revision.

...PRWUA has the right to maximize the diversions of Duchesne River drainage water under PRP water rights, and the right to convey that water in the natural channel of the Provo River to Deer Creek Reservoir. PRWUA has a contractual obligation to the U.S. and CUWCD to maximize the diversion and storage of Duchesne River drainage water under PRP water rights.

...PRWUA requests that the LEIS and any resulting designation recognize the withdrawal of lands for purposes of the PRP and the Provo River Channel Revision, as well as PRWUA's right and obligation to maximize the diversion and storage of water from the Duchesne River drainage under PRP water rights. (Letter 218)

WCNF – In regard to the potential suitability of a ten mile-segment of Little Cottonwood Creek for designation. The proposed section of the creek is located on the Wasatch-Cache National Forest and includes the "source" area to the Murray City Power Diversion and water treatment plant for Metropolitan Water District of Salt Lake and Sandy.

The Wasatch Front includes seven main canyons of which four supply the drinking water supply to Salt Lake City and County customers. These canyons include City Creek Canyon, Parleys Canyon, Big Cottonwood Canyon, and Little Cottonwood Canyon and are currently designated as “Protected Watershed Areas”. The upper portion of Emigration Canyon is designated as a protected watershed although it is not currently being used within the Salt Lake City’s culinary distribution system. Sixty percent of the Salt Lake City’s drinking water originates from these four watershed canyon areas. Special regulations currently enforced in these watersheds include: no dogs (except by special permit for residents and search and rescue dogs) or domestic animals, no swimming, no horses, no public off-road-vehicles are permitted, littering is prohibited, and people are encouraged to use the restroom facilities.

Congressional Acts regarding the protection and management of Salt Lake Valley’s water supply include Public Law 63-199 adopted in 1914 which essentially withdrew federal lands from future mineral claims and removed federal lands from surface property disposal in City Creek, Red Butte, Emigration, and Parley’s Canyons. This law also required the U.S. Forest Service to manage lands in these canyons with regard to them supplying municipal water. Public Law 259 adopted in 1934 reserved the surface estate in any mineral patents on USFS lands in the canyons of Mill Creek, Big Cottonwood, and Little Cottonwood to protect Salt Lake City’s water supply. In 1990 Congress passed Public Law 101-634 the “Salt Lake City Watershed Improvement Act” affirming both the 1914 and 1934 Acts.

Salt Lake City Department of Public Utilities, Metropolitan Water District, and Sandy City have title to numerous water rights in Little Cottonwood Creek. Existing storage reservoirs in Little Cottonwood Canyon, include Cecret Lake, White Pine Lake, and Red Pine Lake. Cecret Lake is located in the headwater, or “source”, area of Little Cottonwood Creek and White Pine and Red Pine storage reservoirs are both tributaries to Little Cottonwood Creek. There is a large diversion structure, across the width of the stream, at approximately two miles up canyon, commonly known as the old Whitmore Oxygen Plant. There is also a diversion to supply the Murray Power Plant.

It is absolutely essential that Salt Lake City continue to utilize Little Cottonwood Creek for meeting the water demands of the public. As we understand the criteria for the classification of a “Recreational River Area” and given the continued diversions that will impound and divert water for the uses of water supply and power generation, it is Salt Lake City’s opinion that this segment of Little Cottonwood Creek should not be recommended to Congress of the United States as a suitable segment for inclusion into the National Wild and Scenic River System, as this segment does not meet the established criteria established by Congress for a Wild and Scenic designation. (Letter 107)

WCNF – The Beaver Creek segment flows from the Forest Boundary through Kamas Valley and the water rights belong to the shareholders of the Beaver/Shingle Creek Irrigation Company. How can these be designated? (Letter 151)

WCNF – Provo River – District operates Trail, Washington, and Lost Lake Reservoirs at head of Provo River. Water rights in these reservoirs allow the upper end of the Provo River to be shut off dry. Water from the Duchesne tunnel is stored in Jordanelle Reservoir by exchange and is used to meet the cup water supply. (Letter 142)

PROC 900 – General comments.

Carbon County supports a proficient suitability study to bring this portion of planning effort to a close. (Letter 10)

The LEIS should identify whether a Wild and Scenic River designation will provide additional tools and mechanisms to protect the creek and watershed. (Letter 111)

We are grateful to you for providing us with ample time to comment during the scoping stage of this process. (Letter 116)

We concur with the (scoping) purpose and need statement in directing the USFS in the development of the DEIS. The EIS needs to clearly explain why or why not a river segment is not recommended to Congress for potential inclusion as a National Wild and Scenic River. The selective process should be clearly identified within the DEIS. (Letter 210)

I am concerned about the issue of interim protection during this DLEIS/FLEIS process. I fear that publicity about this process may motivate some interests to want to expedite proposed developments or uses that would be incompatible and therefore that could preclude consideration of otherwise eligible and potentially suitable river or stream segments. If it has not already done so, I recommend that the Forest Service and/or relevant Forest Supervisors adopt a moratorium on accepting or processing any proposed land use authorizations that could adversely affect the eligibility of a segment found to be eligible. This moratorium on any new or changed potential incompatible developments or uses would maintain the status quo during the DLEIS and FLEIS phases of analysis. This would prevent any possible embarrassments if it was subsequently learned that a previously eligible segment became ineligible due to a Forest Service authorization. This moratorium could be lifted when the ROD is issued, except for those river and stream segments found in the ROD to be both eligible and suitable, and recommended to Congress for WSR designation. As you know, a federal agency cannot make any irrevocable commitment of resources or foreclose any management options during its NEPA analysis. As such, it is important that no management actions or decisions occur that could bias or jeopardize the integrity of this NEPA evaluation. (Letter 162)

The goal of this statewide study is to determine which eligible rivers on Utah's National Forests are suitable to be included in the National Wild and Scenic River System. All of the comments on suitability factors and information that is compiled as part of this process are simply to aid the Forest Service in answering these questions. I include these questions here to stress the overall purpose of the suitability study to the Forest Service and to encourage the Forest Service to never lose sight of it. (Letter 209)

The results of this study will be important to Utah and will also be important nationally. (Letter 209)

Oppose anything that would alter the existing rights of livestock and humans. (Letter 141)

Suitability criteria used emphasizes political considerations too much. (Letter 118)

Make suitability determination process transparent to make it easier for all interested parties to understand and therefore, buy into the conclusions of the study. (Letter 118, 209)

Each river or river system that is evaluated as part of this process should include a detailed summary of the suitability factors and an explanation of how the conclusion was reached. All of the comments received on the specific rivers could be included in an Appendix to the report. (Letter 209)

MLSNF – Emery County provided a document to Manti La Sal planning staff entitled Lower Left Fork of Huntington Creek Suitability Report and we have been reassured that the contents of that document is in your hands and will be referred to in making final determination of suitability. The report provides extensive information which clarifies the reality of present conditions with regard to Lower Left Fork of Huntington Creek and lands adjacent to the river corridor. (Letter 153)

MLSNF – The Manti-La Sal NF should create a mechanism for continuous review of Wild and Scenic status during the full term of the Manti-La Sal NF LRMP. The timing of Wild and Scenic River review is not tied to the LRMP revision process. If the Forest Service truly wants flexibility in planning, then full flexibility in such resource evaluations as Wild and Scenic River review should not be limited to once every 15 to 20 years. Significant benefits from designation of a river should lead to the evaluation of other rivers not designated during this round of forest planning.

The Forest Service should not expect flexibility for resource development if it is unwilling to demand flexibility in resource conservation.

PROC 901 – Authority of Agency.

Please assure that any suitability findings recognize that only Congress can include a river segment in the National Wild and Scenic River System. New federal land management plans cannot establish the equivalent of interim management policies that base land use decisions upon a river segment's suitability. (Letter 122, 149)

Only Congress can include a river segment in the National Wild and Scenic River System, not federal agencies by management policies and procedures. (Letter 221)

PROC 902 – Compliance with laws/regulations/ interim directives.

None of the eligibility factors should in any way have any impact on the suitability or non-suitability of any eligible rivers. All of the above mentioned factors are a list of existing conditions and uses and would merely impact the classification of an eligible/suitable or designated river. None of the existing conditions, resource activities, or uses of the land would in any way have an impact on the suitability of a river to become a Wild and Scenic River. (Letter 209)

None of the existing conditions along the river corridors should be any different than it was at the time of the original study because all rivers found eligible receive interim protection and must be managed to protect their free-flowing condition and outstandingly remarkable values until a decision has been made on their suitability or non-suitability as is stated in the Forest Service Handbook 1909.12 Ch 82.5. Therefore, a change or difference in any of the existing conditions along an eligible river corridor now than at the time of the study would indicate that the Forest Service was not performing its duty to manage the river corridor in order to protect its values and according to the tentative classification. Any activities or developments allowed to occur since the time of the eligibility study should have been consistent with the tentative classification of the river segment and would not now cause the tentative classification to change nor would they impact the suitability of the river segment. (Letter 209)

National standard locations such as the Grand Canyon as “reference” areas should not be used to compare other rivers in the state. This is because although the rivers in the Abajos Mountains have wild and scenic qualities, these qualities would be overshadowed when compared to places like the Grand Canyon. I doubt that the USFS's policy on using national reference areas as basis for comparison is located anywhere in the Wild and Scenic Rivers Act. (Letter 243)

DNF – The Navajo Nation, the Historic Preservation Department – Traditional Culture Program (HDP-TCP) received a request for consultation regarding the above undertaking and/or project. After reviewing your consultation documents, HDP-TCP has concluded the proposed undertaking/project area will not impact any Navajo traditional cultural properties or historical properties. The project is outside Navajo Aboriginal Lands. (Letter 250)

MLSNF – How does this WSR evaluation tie to the slowly evolving new plan for managing the forest? (Letter 249)

PROC 903 – Public involvement.

Iron County requests a working group facilitated by the State of Utah involving Iron, Garfield, Kane, and Washington Counties, the Forest Service, and the BLM. Request a subsequent regional meeting with Forest

Supervisors and equivalent BLM officials to have a dialogue regarding WSR suitability recommendations. (Letter 16)

Open house presentation was very informative and well organized. (Letter 21)

Thank you for scheduling one of your open House Suitability Study sessions in Lyman, WY. (Letter 54)

In addition, BRWC commends the Forest Service for involving the public throughout the process. Public opinion is an important element in formulating such a recommendation to Congress. (Letter 112)

Thank you for the opportunity to submit comments regarding the Utah Statewide Wild and Scenic Rivers Suitability Study. Local officials in southwestern Utah appreciate the efforts of the team to solicit public comment and involve elected officials and staff. We recognize the long hours spent in meeting across the state during May and June. (Letter 122)

Of equal concern is a team far removed from the local forest preventing close communication and coordination with local expertise. Uintah County understands and supports the need for consistency in this process but feels this can be accomplished without exclusion of needed local participation. (Letter 211)

I want to commend you and other Forest Service employees for your good work in providing comprehensive information for the public that explains this important process. I reviewed the relevant web sites, and found them to be very interesting and helpful. (Letter 162)

We are concerned with the suitability factors that have not been mentioned in the above discussion. One reason for this concern is that, as stated above, the list of suitability factors presented as part of this study differs from the list of suitability factors in the Forest Service Handbook. We are concerned with how these factors will be interpreted by the Forest Service. Thus, we request that the Forest provide us information on why these suitability factors are different and information on how the Forest Service plans to interpret them to determine if they lead towards a positive or negative suitability finding. (Letter 209)

These studies and government control only cost the taxpayers money...All this does is put these areas out there on the internet for the tree huggers to get involved with telling us what we can do in our own backyards. (Letter 255)

DNF – Garfield County has initiated a Wild and Scenic Rivers evaluation process. Although preliminary in nature, some criteria has already been developed for ORVs associated with scenery, cultural resources, and other values. In addition, several river segments are being evaluated as potentially eligible and/or suitable. The arbitrary and unilateral process conducted by the Dixie NF, to date, countermands the County's efforts and is inconsistent with County's findings. Please provide Garfield County with historical data associated with the 1986 plan determinations, the information identified above, and any other data associated with the eligibility in suitability of wild and scenic rivers on national forests in Garfield County. We also request an opportunity to meet with planners to provide input and to determine a process/schedule for cooperative suitability determination efforts. (Letter 79)

DNF – Moody Wash: The Washington County Commission appreciates the review done by you and your staff of the proposed addition of Moody Wash to the Wild and Scenic River System as part of the forest planning process. Your desire to include local officials in the evaluation process is greatly appreciated. (Letter 268)

DNF/MLSNF/FNF – Public involvement process was not adequate in Dixie-Fishlake Manti-La Sal Eligibility processes. (Letter 118)

MLSNF – As a Monticello City Councilman, I would like to thank the Forest Service for the open house on Wild and Scenic River suitability held on July 26, 2007, in Monticello. The meeting was very informative to those who attended with a desire to understand the process and what is being proposed. (Letter 260)

MLSNF – Thanks to you and your team for the open house at Monticello. It is always useful to see complex land use analyses presented in person and to have the opportunity to ask questions of the team. (Letter 249)

PROC 904 – Eligibility/inventory process.

The development of a rating system which is incredibly easy to manipulate based on the whims of reviewers, county government representatives and not in-depth information— such as that submitted by concerned citizens or conservation advocates such as the UEC—shows a level of arbitrariness and capriciousness which defies the intent of the National Environmental Policy Act and the Administrative Procedures Act. The arbitrary and capricious nature of decisions to remove some watercourses can also be seen in the inconsistent manner that some evaluation criteria were applied. For example, the Lower San Pitch drainage was eliminated because of a water diversion. Was this diversion such that it precluded analysis for designation? Huntington Creek has a dam, yet it remains on the list of watercourses under analysis. (Letter 70)

We are also not sure how the documents produced so far fit into the NEPA process. Too many requirements of NEPA seem to be missing from the documents. (Letter 70, 117)

We would like to thank the Forest Service for taking on this large EIS project. We urge the Forest to do this once and to do it right. We believe that in order to do this, another scoping period should be offered after the base inventory or eligible river segments is made right and circulated to the public. (Letter 166)

Issue of River Eligibility Is Part of Scope of EIS – The local governments recommend that the scope of the EIS be revised to include the issue of eligibility. Under the Wild & Scenic Rivers Act the issue is both one of eligibility and suitability. 16 U.S.C. §1273; Forest Service Handbook (FSH) 1909.12, ch. 80, ¶¶82.12-82.14a, 82.4. Thus, the recommendations in the EIS should address both parts of the decision process instead of pre-deciding the first step.

The proposed action is recommendation for designation. While the Forest Service has already done an inventory, the decision of eligibility is part of the recommendation to be covered by the EIS. Thus it is improper to limit the EIS to suitability, when the proposed action adopts two decisions: eligibility and suitability. The CEQ rules define the scope of the proposed action which must include connected, cumulative and similar actions. 40 C.F.R. §1508.25(a). The decision on eligibility is a connected action that is within the scope of the proposed action. (Letter 165)

The USFS should have objective criteria for evaluating ORVs necessary to justify eligibility. As a cooperating agency, Garfield County should have been provided the opportunity to participate in development of that criteria and in its implementation. Although Garfield County believes it is a violation of NEPA to exclude cooperating agencies in such a manner, the USFS should provide the evaluation criteria and the individual analysis for each segment prior to proceeding with suitability. We specifically request that such information be provided and that Garfield County be given an opportunity to evaluate the information prior to proceeding with suitability determinations on rivers in Garfield County. (Letter 79)

The Sierra Club is particularly concerned about the loss of eligibility determinations in San Juan County. There was a non-public process that removed the eligibility of all stream segments in San Juan County. Not even interested publics that had made substantive comments were notified of the change. The change would appear to ignore the professional judgment of Forest Service staff that made the original determination. The decision to make a change in determination without notice or involvement of the public is morally repugnant

and without legal merit. All streams in the original determination should be added back to the list of eligible streams and the supplement should be discarded. (Letter 117)

ANF – Uintah County (Utah) has concerns on the methodology used in eligibility determinations and have been frustrated by the lack of opportunity to resolve those concerns. For example, many ORVs identified are not associated with the segment corridors, water flows, or are clearly not of regional important. We have been advised that management actions will be implemented to protect lands identified as eligible. Our concern is that eligibility was based on criteria the USFS sought no public input and did not permit local government's participation in development. There was no written EIS at the time of eligibility statement, and we feel that work took place on the ground which would have required an EIS. We believe eligibility should be revisited and analyzed in the LEIS. Suitability should be based on a proper analysis of eligibility or the whole process is flawed. In our opinion, there are segments that are clearly not eligible. (Letter 211)

ANF – Early on in this process when the county was advised that the Ashley National Forest had developed a draft Wild and Scenic River Eligibility Report the County expressed concern regarding the eligibility criteria used and that the County was not invited to participate in the process as cooperators or even consulted prior to the release of the report. At that time we were advised that the forest planning process no longer required the use of the NEPA process thus the county would not be given cooperator status but would be given special consideration in the preparation of the document. To date the only participation afforded the County and not provided to the general public was an opportunity to comment on drafts prior to them being made public. It appears that it is the intent to continue in this direction.

Now that the WSR process is being conducted under NEPA it should be clear that the County should be included in the process as a cooperator and a full participant as provided for in law and regulation. Thus, Daggett County request that they be granted cooperator status and participation as provided by law and regulation in the development of this LEIS.

Of equal concern is the apparent assignment of this process it to a team far removed from the local forest preventing close communication and coordination with local expertise. The County understands and supports the need for consistency in this process but feels this can be accomplished without exclusion of needed local participation.

As stated above we have expressed our concerns on the methodology used in the eligibility determinations and have been frustrated in lack of opportunity provided to resolve those concerns. As an example many of the ORV's identified are not associated with the segment corridors, water flows within the segment or are clearly not of regional importance. The County has been advised that management actions will be implemented to protect lands identified as eligible. Based on this and our concerns that eligibility was based on criteria that the Forest sought no public input on and did not permit local government participation in development the County believes that eligibility should be revisited and analyzed in the LEIS. Suitability should be based on a proper analysis of eligibility or the whole process is flawed. There are segments that in the County's opinion clearly are not eligible yet now have to be analyzed for suitability. (Letter 148)

DNF – The Dixie NF contracted with a consultant to develop an eligibility report as part of forest plan revision. Garfield County, as a cooperating agency, was involved in preliminary discussions regarding review of the consultant's report. It was determined that the report was inadequate and factually incorrect. The Dixie NF completely revised the consultant's report. Garfield County was excluded from the process. We believe it is a violation of the cooperating agency requirements of NEPA. We believe the process should not continue until Garfield County is given adequate opportunity to evaluate the eligibility report. (Letter 79) As part of the 1986 Dixie forest planning process, Wild and Scenic rivers were to be evaluated. It is our understanding that no river segments were found to be eligible or suitable under the Wild and Scenic Rivers Act as part of the 1986 plan. It is our understanding that provisions of the W&SR Act require subsequent planning efforts to demonstrate a change in fundamental character if a change in eligibility or suitability is proposed. Garfield County specifically requests an analysis of the fundamental changes which have occurred in the rivers now considered eligible for designation. (Letter 79)

Garfield County has repeatedly requested eligibility analysis and documentation regarding Wild and Scenic rivers on the Dixie NF. We have been informed that the Dixie is expanding what was done by neighboring agencies. Wild and Scenic Rivers merit specific analysis. Arbitrarily extending eligibility/suitability without any actual analysis is insufficient to meet the USFS planning responsibility. In addition, an examination of adjacent agency documentation indicates a lack of specific criteria and analysis. The documentation only contains summary conclusions. (Letter 79)

Garfield County has examined the national Wild and Scenic Rivers web site. A comparison of rivers identified on the Dixie NF with rivers designated as part of the Wild and Scenic River system demonstrates notable inconsistencies in size, characteristics, prominence, significance, and flow. The rivers being considered on the Dixie are significantly different and less important and those currently designated under the act. Garfield County objects to the arbitrary lowering of standards in order to find some river that qualifies. (Letter 79)

DNF – We would like to reiterate our concerns about the process selected for evaluating river segments for inclusion in the National Wild and Scenic Rivers System (NWSRS). The agency has elected to artificially segregate the evaluation process into eligibility and suitability components. This artificial segregation is not called for by the Wild and Scenic Rivers Act (WSRA), nor is it appropriate to meet the requirements of the Act. We have also expressed concerns in the past, which we reiterate here, that the process of reviewing river segments for eligibility was superficial and weighted in favor of finding eligibility by the factors selected and the comparisons that were elected or avoided in the process.

In particular, a number of river segments simply are not outstandingly remarkable when taken in context of many similar river segments in the area. This criticism applies to the Moody Wash segment that was recently reinstated into the list of eligible river segments by the USFS. It appears that the process by which the eligibility determinations were made was faulty, in particular that it was insufficiently objective and failed to apply rational standards reasonably comporting with the provisions of the WSRA. The Moody Wash segment is not free flowing because it simply does not flow at all in some portions of its length. It is similar in nature to other segments in the area, a fact that appears not to have been taken into account by the USFS, perhaps due to the fact that the personnel are not familiar with other river segments in the area or other similar river segments generally. (Letter 154)

DNF – Despite my general support for this process, I believe that the earlier eligibility evaluations by a contractor were deficient in some respects. For example, I do not believe that there was adequate advance notice of this earlier portion of the process, nor sufficient opportunities for meaningful public involvement. In addition, I do not believe that there was any NEPA compliance in making the eligibility determinations, even though I am not aware of any Congressional exemption or administrative categorical exclusion that would preclude the need for NEPA analysis.

Eligibility determinations are crucial because any river or stream segments not found eligible are thereafter excluded from WSR consideration. These determinations are also not purely mechanical, objective, or ministerial. They involve applying different eligibility criteria to a wide variety of resources or features and making somewhat subjective comparisons under diverse conditions throughout the state. Indeed, it is likely that reasonable people applying the same criteria to the same river or stream segment could come to different eligibility conclusions. Ultimately, a large degree of discretion and subjective judgments went into making these eligibility determinations. As such, NEPA analysis is appropriate and necessary.

To remedy this deficiency, I think that the Forest Service has two choices. First, to revise the current scoping notice and extend the public comment period to invite input on any alleged errors or omissions, or to provide any relevant information, on all of the eligibility findings. The current scoping notice gives the impression that the eligibility process is concluded, and that only those segments found eligible remain viable for the DLEIS. A revised scoping notice could correct this impression. Second, in the alternative, the Forest Service could let the current scoping notice stand, but provide in the NOA for release of the DLEIS an explanation that input is welcomed on the previous eligibility findings. I believe that the first option is much better than the second, because the second increases the risks of greater potential surprises that could

necessitate preparation of a supplemental DLEIS. In either case, public input on eligibility could be integrated into the DLEIS analysis, thereby resolving the present NEPA deficiency. (Letter 162)

DNF/MLSNF – Eligibility factors used went beyond two mandated by law. Especially Dixie-Fishlake and Manti La Sal. (Letter 118, 209)

DNF/FNF/MLSNF – In other words I want to make it very clear that these comments do not preclude a future eligibility or suitability study on any rivers not included in the Forest Service’s statewide suitability effort, particularly as related to the Dixie, Fishlake and Manti – La Sal National Forests. (Letter 209)

DNF/FNF/MLSNF – The base inventory of eligible river segments presented is inconsistent, arbitrary, and capricious due to the politically filtered eligibility inventories on the Dixie, Fishlake, and particularly, Manti-La Sal National Forests. All you have to do is glance at the state map made available on the web for scoping and you know something is fundamentally broken with the base inventory. UEC staff have been told verbally from a handful of different sources (within and outside of the Forest Service) that at least the Manti-La Sal’s base eligibility inventory went through a County commissioner level, anti-conservation meat grinder of sorts. This has biased and pre-determined the outcome of this EIS process in a manner that is in conflict with the NEPA and the APA. UEC urges that the IDT for this six National Forest LEIS initiate a clean, new eligibility inventory at least for the three National Forests in southern Utah. Without doing this, the EIS process would be arbitrary. (Letter 166)

MLSNF – American Rivers disagrees with Manti–La Sal list of eligible rivers.

...Manti-La Sal decision to delist eight rivers was arbitrary – at least four rivers meet the two criteria for eligibility.

...8 delisted Manti-La Sal rivers should be included in suitability study. (Letter 118, 209)

...Need documentation to show that 8 delisted streams are ephemeral and not intermittent as intermittent streams are eligible under agency guidance. (Letter 118)

MLSNF – It has recently come to my attention that several of the rivers segments in the Abajo Mountain Region of SE Utah that were initially considered "potentially" eligible for Wild and Scenic River Designation in the Manti-La Sal Forest report dated March 2003 have been dropped from such consideration. Wanting to know more I went to the FS website only to find initially the March 2003 report still stating the eligibility off these rivers. Upon further investigation I found out that without informing the public there was a supplemental report issued by the Manti-La Sal National Forest office where these river segments (Arch Canyon, Hammond, Butts, Texas, Dark, Fish & Lower Gooseberry etc.) were dropped.

The first question that comes to mind is why were they dropped? Next, why without any public input? And finally, why wasn't the public informed at all and why make the information fairly difficult to find on the web page if a person were to go looking for it?

Regardless of the response to the above questions the real point I want to make is that these river segments and associated waterways are valuable and unique unto themselves. In addition, they are also important contributors to the health of many of the regions incredible ecosystems particularly in the Abajo Mountains. They are also a very valuable "public" resource and therefore the "public" should have input on how they think these resources should be managed. My understanding is that the Forest Service operates with the mandate to manage such public land and resources "in trust". The current process has great potential for significantly reducing and eroding that trust.

Please resubmit the deleted river segments in the Abajo Mountains that you all initially found eligible for "wild and scenic" status and allow the public the process due them of being involved in deciding the suitability issues. (Letter 144)

MLSNF – We feel that it is important to address the process, which has ensued by the MLSNF in determining eligibility. Red Rock Forests, along with other interested public, only recently became aware that the MLSNF issued a “Supplement” to their “Final Eligibility Determination of Wild and Scenic Rivers

Report” of March 2003. This undated supplement removes 23 once-eligible river segments from the Monticello Ranger District from eligibility. *This report was never made available to the public by the MLSNF.* Those who participated in the public process that resulted in the Final Eligibility Determination Report were never informed that the decisions of that report were changed; and were never given the opportunity to provide comment, question or challenge to those decisions.

We feel that because the MLSNF has violated the public’s trust in the process for determining eligibility, the agency owes the public and the community the opportunity to engage in this process appropriately. As it stands, as soon as the MLSNF realized their error in not releasing the Supplement for public comment, a notice should have been mailed to everyone on the forest’s mailing list, including but not limited to those who commented through the original process, informing them of the existence of the Supplement, and *inviting comment.*

Currently, anyone visiting the website for the MLSNF would continue to believe that the 23 river segments from the Monticello Ranger District were still eligible because the link entitled “Projects and Plans,” and the link entitled “Wild and Scenic River (WSR) Eligibility Report” leads to the 2003 Final Eligibility Report. If you read that report, you would have no inkling that a Supplement was issued. If you *ignore* the link for Wild and Scenic, and instead go to the link entitled “Forest Plan Revision.” THERE IT IS, for all the public.

Continued obfuscation? Or a simple error? It continues to elude us as to why it is so difficult for this forest, as a unit within this agency, to operate under the guise of transparency. After all, the agency holds the public trust, because the agency is charged with the sustainability of ‘public’ lands. This is a simple issue – one that continues to get wrapped up in missed opportunities to engage the public in understanding and expressing their thoughts on how the agency is managing the public’s legacy.

We are not calling into question the veracity of the employees of the MLSNF, but rather are calling out for more care when it comes to handling the public’s trust. And, it would seem that if the forest and the agency were convinced that what they are doing uphold the public’s trust, then there should be no objection, and in fact there should be a race to see how quickly information can be shared, and feedback encouraged, from the public.

As it stands, the validity of the forests’ process is in question. Red Rock Forests has been in communication with a few members of the MLSNF staff, who have indicated that the analysis that resulted in the Supplement is being revisited.

Quite simply, while we appreciate that this information has been shared with us, the rest of the public should be made aware of this as well.

On October 25, 2004, the MLSNF issued a Notice of Intent to Prepare an Environmental Impact Statement for a revised Land and Resource Management Plan for the forest. Included in this Federal Register Notice was the following:

“We propose to complete the suitability analysis on the Fish Creek and Gooseberry Creek, lower left fork of Huntington Creek, Huntington Creek, Hammond Canyon, and the north fork of Whiskers (including Whiskers Draw) eligible river segments during Forest Plan revision. We propose to develop interim direction for management of activities and uses that have the potential to affect the outstandingly remarkable values for the remaining nine eligible river segments. This interim direction will be utilized for management of each river segment until the suitability analysis can be completed (post-revision), at which time the segment will either be recommended for inclusion in the Wild and Scenic River System or not.

When did the MLSNF re-issue this notice in relation to Wild and Scenic River eligibility?

Red Rock Forests urges the MLSNF to provide sufficient restitution of legitimacy to this process for the public. Our position is clear: *the original 2003 Final Eligibility Determination of Wild and Scenic Rivers Report is the document on record with the public which states which river segments within the forest are eligible to be considered in the next step.* We do not accept the undated Supplement as a legitimate agency decision, as it violates the National Environmental Policy Act and the Administrative Procedures Act for federal decision making. The forest cannot ‘fix’ this by simply issuing yet another Supplement, void of public review and comment. In order to allow the state-wide Suitability process to continue on its current schedule, the forest must reinstate the 2003 Final Report.

The only other option is to start the entire eligibility process over, with the new criteria being made public for comment and review, and all initial segments (evaluated individually, rather than segments in neighboring canyons being lumped together) under consideration reevaluated.

The current undated Supplement cannot stand as the representation of the public trust for the Manti-La Sal National Forest. (Letter 70)

MLSNF – Resource specialists did the original evaluations that were then modified at the request of county commissioners. Were those county commissioners educated by the Forest Service about the process of evaluating rivers under the Wild and Scenic Rivers Act? Elsewhere we describe the failure of the Forest Service to discount the comments of a county representative when those comments are clearly counter to the wording of the Wild and Scenic Rivers Act. Are those county commissioners informed enough to influence evaluations? Did they present credible materials that could effectively counter the conclusions of resource specialists? Again we think much of the decision process in determining which rivers to bring to the level of suitability analysis was arbitrary and capricious. We do not believe it is reasonable to substitute the opinions of local politicians that likely originate from a bias against, and a lack of understanding of, the Wild and Scenic Rivers Act for the evaluations of resource specialists.

...Some guidance was changed for evaluating rivers. Forest Service managers also altered some rankings either for ORVs or SOIs. There were also some odd changes in some categories for appropriateness.

The Forest Service made the following criteria for evaluation:

- Diversity of View
- Consider the presence of high relief; severe surface variation; rich color combinations (i.e., high variety, vivid colors); pleasing contrast in soil, rock, vegetation, and water; views that greatly enhance visual quality; *still or cascading water that is dominant in the landscape.* [Emphasis added]
- River corridors with the greatest diversity and variety of views, both foreground and background are of higher value. (Section V Appendices, p. 168)

This guidance is clearly incorrect for evaluating Wild and Scenic Rivers.

The Manti-La Sal NF used the following evaluation scale: Cultural Modifications can be HA = Highly Appropriate, A = Acceptable, or I = Inappropriate. (Section V Appendices, p. 169) Cultural modifications have varying degrees of appropriateness depending on the consideration for Wild, Scenic or Recreation designations. The appendices did not make it clear that this evaluations scale should be used according to the type of designation under consideration. *Since many rivers moved from HA to A based on this scale but very few rivers were under consideration for Wild River Designation it is very likely this scale was not used in a reasonable matter.* In fact the use of this scale introduced a high level of arbitrary changes without corroborating or supporting material. (Letter 70, 117)

PROC 905 – Cooperating Agency.

Garfield County has serious concerns considering the way the process is proceeding. It appears the USFS has unilaterally, arbitrarily, and capriciously excluded cooperating agencies from the Wild and Scenic River process and is attempting to create Wild and Scenic Rivers where none exist or without proper documentation. (Letter 79)

Uintah County should be included in the process as a cooperator and full participant as provided for in law and regulation. Uintah County requests they be granted cooperator status and participation in the development of this LEIS. (Letter 211)

The Utah State Office of the BLM requests cooperating agency status for preparation of this EIS. BLM has expertise on river segments within its jurisdiction, and would like to apply that expertise in two ways: 1) towards addressing statewide impacts in the cumulative impact section of the USFS Legislative EIS; and 2) towards striving for collaborative consistent management across agency boundaries. BLM proposes that the cumulative impact section of the LEIS address impacts related to wild and scenic river considerations for FS, BLM, and NPS rivers statewide. This would result in statewide cumulative

analysis, and could allow for a statewide reporting package to Congress, should all agencies agree with that approach. (Letter 223)

ANF – The study involves a number of rivers that flow into or are located in either Uinta or Sweetwater Counties. *See e.g.* Middle Main Sheep Creek, Lower Main Sheep Creek, Carter Creek, Cart Creek Proper, Green River, and Pipe Creek for the Ashley National Forest. Thus the study and adjacent land use decisions directly affect the interests of the county and conservation districts. The Wyoming local governments are in a position to provide relevant and important information regarding land uses and water rights that cannot be fairly addressed by the State of Utah. The local governments also suggest that the Forest Service invite the State of Wyoming to be a cooperator, since significant state water interests may be affected.

Sweetwater County qualifies as a cooperating agency. The county is a local government agency established under Wyoming law with broad powers to provide for the development and zoning of all lands within its boundaries, to provide for a transportation system, to provide for law enforcement, and other services. The county implements its authority in various ways, including land use planning and zoning, approving construction within the county, and providing for the maintenance and construction of roads within the county.

The Sweetwater County and Uinta County Conservation Districts are authorized under Wyoming law to assist, promote, and protect public lands and natural resources, soil, water, and wildlife resources, to develop water and to prevent floods, to stabilize the ranching and agriculture industry, to protect the tax base, and to provide for the public safety, health, and welfare of the citizens. Wyo. Stat. §11-16-101, 122. State law also authorizes the conservation districts to accomplish their objectives through research and education, implementation of erosion control, water, and range projects with landowners, development of comprehensive plans, demonstration projects, providing financial and other assistance to landowners, management of flood control projects or lands under cooperative agreements with the United States, and adoption of rules and ordinances. The SWCCD has adopted a comprehensive natural resources plan and policy that addresses the importance of water resources to rangeland, soil, and water conservation.

The local governments have special expertise, 40 C.F.R. §1506.16, with respect to local government resources, including water, land use, zoning, and transportation. The local governments are recognized as cooperating agencies for several land use plans and projects, are authorized to enter into a cooperating agency Memoranda of Understanding, and have done so on several occasions. The local governments can and will commit to participating as a cooperating agency and will meet the milestones.

The 2004 planning rules direct the Forest Service to consult and coordinate with local governments as part of the public participation process. 36 C.F.R. §219.9. The local governments believe that cooperating agency status is the best vehicle to meet this objective. (Letter 165)

DNF – One of the major criteria for suitability is local support. Considering Dixie NF has excluded Garfield County from the eligibility analysis, has failed to provide any objective eligibility criteria, has extrapolated questionable information from adjacent agencies and is racing forward with suitability analysis without regard for local government's concerns for eligibility, Garfield County currently opposes management of any of the segments as Wild and Scenic Rivers. Much of the opposition is based on insufficient information and the Dixie's exclusionary process. We request the opportunity to be fully involved as a cooperating agency and to have our input seriously considered. (Letter 79)

PROC 906 – Alternative development.

There is eligibility disparity between the Wasatch-Cache and Ashley National Forest and the rest of Utah's four national forest inventories. Each alternative should reflect the positive disparity and harbor the respective preponderance of Ashley and W-C river segments. Each alternative should reflect that 43 segments are in the High Uintas. Both forests and Uintas harbor the most eligible segments and should also harbor the most suitable segments.

Another alternative that must be considered should be one that finds all roadless area river segments suitable. Because they are in roadless areas and by management guidance policy, without significant conflicts as

defined by suitability criteria and because of their roadless geography have inherently higher river values, high ecosystem and aesthetic values. This alternative could possibly be portrayed part and parcel with designated wilderness river segments. (Letter 50)

The comments provided in Attachment A represents our organization's submission of a Sustainable Multiple Use Alternative with regard to the specific river segments within the Manti-La Sal National Forest. However, the concept used to develop this alternative can be applied to the rivers under consideration, statewide. (Letter 70)

EPA recommends that in evaluating the no action alternative that the DEIS clearly explains and evaluate impacts of all foreseeable future anthropogenic actions that could occur to that specific segment if it is not included for protection under the NWSRA and the consequences of these impacts on the river's ecology. (Letter 210)

When the USFS prepares the draft EIS, it must assure that all rivers within roadless areas of the forests be given protection under the W&SR Act. None have any tangible suitability conflicts. They must be protected. (Letter 128)

The suitability phase should not be dominated by making "easy" choices. The final inventory of suitable waterways should not largely consist of the Green River just below the Flaming Gorge Dam and the rivers and streams inside designated wilderness. Decision-makers ought to view the process as an opportunity to enhance preservation of wild and scenic areas within the State. (Letter 103)

To meet these mandates, and to address unresolved conflicts among available resources, we strongly suggest that issues that would need to be treated as significant, alternative-driving issues in the Draft LEIS include:

- The strong beneficial socioeconomic benefits realized from GREATER amounts of WSR recommendations by the Forest Service. In other words, there would be a cascade of beneficial local, regional, and national economic effects from increased WSR recommendations, and that fact needs to be both analyzed in detail in the EIS, as well as used to drive alternatives with greater numbers of WSR recommendations (and therefore greater beneficial economic and social effects).
- Unlike the Wilderness Act, the language of the Wild and Scenic Rivers Act makes very clear that it is the intent of Congress with this Act to focus upon and actively seek out designation of rivers that are actively threatened with some type of impact such as diversion or damming that WSR designation would prohibit. Therefore, and to work towards meeting the intent of this Act, rivers and river segments where there is any kind of reasonably foreseeable negative impact from existing or future human developments that do NOT currently have any type of preservation protections (such as designated Wilderness), need to be recommended to Congress for WSR designation. In other words, the need to recommended to Congress WSR designation to all river segments where doing that that would actually stop impacts on the ground will need to be treated as an alternative-driving issue.
- Beneficial impacts to riparian and aquatic dependant species should also be treated as a significant, alternative-driving issue. (Letter 166)

I recommend that the Forest Service identify as its preferred alternative recommended WSR designations for all of the river and stream segments that the Forest Service finds to be both eligible and suitable. I realize that NEPA and the CEQ regulations require that you analysis a reasonable range of alternatives, including no action. This usually would mean an alternative recommending no WSR designations (no action), as well as one to recommend perhaps all eligible segments (maximum WSR protection). I know that the Forest Service will need to make difficult decisions, and balance various interests, but I hope that the Forest Service will have the foresight and courage to support an alternative with reasonable WSR designation recommendations. (Letter 162)

In addition to the no action alternative, the Council requests that the Forest Service develop an alternative where all of the eligible rivers are found suitable. This will aid in the discussion of a true range of alternatives – the public should discuss the pros and cons of protecting all of these outstanding rivers before we begin any other discussions (Letter 209).

For the remaining alternatives, the Council requests that the Forest Service use the following as weighted criteria to develop different alternatives by “weighing” the criteria more or less in different alternatives:

- 1.) Public support. This criterion will grant greater weight to segments which have the support of the public for protection. The criterion should consider the amount of public support for each specific river or river system under consideration.
- 2.) Number of Outstandingly Remarkable Values (ORVs). While the Council does not suggest that the Forest simply “bean count” ORVs, this weighted criterion would be given to stretches with multiple ORVs. This would grant priority for protection to segments where protection would deliver the most diverse values (by one measure) to the American public.
- 3.) Special status of Outstandingly Remarkable Values. This criterion would grant greater weight to protection of segments where the ORVs are especially rare or unique – for example, segments with rare, endangered or sensitive species; segments with a high diversity of species; segments with native fish populations; or segments with special designations (Ex. blue ribbon fisheries, cultural designations, etc.). This weighting would again ensure protection of segments that would deliver especially high value in return for their protection.
- 4.) Representation of the diversity of Utah’s rivers. Utah has incredibly diverse rivers – ranging from the huge Green River to high mountain streams to intermittent canyon streams of the red rock world. One goal of the National Wild and Scenic River System is to preserve the diversity of rivers and river habitats. By adding a weighted criterion for diversity of representation, the Forest Service will ensure that representatives of all of Utah’s diverse river ecosystems are protected – adding interesting and unique rivers to the national system that would represent our incredible state well.
- 5.) Current protections and/or future threats. This criterion would serve two masters. On the one hand, the Forest Service should grant extra weight to rivers without existing legislative protection – for example, rivers outside of wilderness areas. This would direct protection to rivers most in need of protection. On the other – but related hand – weight should be added for those rivers threatened by future development pressures. This weighting would support the goal of the Wild and Scenic Rivers Act, which was to balance the dam building and other development pressures of the last century.

To be clear, the Council is NOT recommending that the Forest Service develop five alternatives separating out each of the criteria above. Instead, we request that the Forest Service develop three to five alternatives (in addition to the no action and all rivers alternatives) that weight these five different criteria in different ways. This way, the results of the different weightings can be compared by the public, and comment can be gathered on the public’s opinion of the importance of the different criteria.

...For example, let’s say alternative A was created by applying the most “weight” to the public support criteria and the second most weight to the representation criteria. The resulting list of rivers might be found to not include five rivers from alternative B, which applied the most weight to the special status of ORVs and the second most weight to multiple ORVs. By comparing these alternatives during the public comment period, the public and decision makers can have an informed debate about the relative importance of the criteria and of the five rivers – why didn’t those rivers have public support? Are they important to represent the diversity of Utah’s rivers given their special status? Etc. (Letter 209)

I did talk with Utah Rivers Council, and while the alternative they submitted is meritorious, to say the least, it does not fully capture the context which we raised that an obvious alternative and one with a deep systematic approach to protect deserving rivers is to find suitable those rivers which are part of roadless landscapes (and designated wilderness landscapes). This does not fragment rivers, an issue Faye Krueger raised, as all river segments under consideration are just that—segments. This proposed alternative in no way suggests rivers that flow outside of roadless areas, entirely or in part, should not be considered—they should! It does say, from the outset, rivers within roadless landscapes are graced with clear and obviously

high suitable values. This approach tends to “clump” rivers in systems and in landscapes with high ecosystem values and inherently low suitability conflicts and seems to define a clear course of action. (Letter 267)

MLSNF – We are concerned that the Manti-La Sal NF has dropped too many rivers or river segments to create a range of reasonable alternatives for analysis and review by the public. The Manti-La Sal NF appears to be foregoing too many forest values without leaving adequate numbers to analyze in a comprehensive manner. Too many future possibilities will be foreclosed by only moving the limited number of rivers into analysis for designation under the Wild and Scenic Rivers Act. (Letter 70, 117)

Summary of Scoping Comments on Rivers not Included in the Current Suitability Study

Comments on rivers not being carried forward in the suitability study.

Wild and Scenic River designation would enhance the health of riparian systems in the Forest. The Act was intended to create a balanced system of rivers with some retained in their natural state. The current list of rivers being studied for suitability defies the balance which should be created when performing adequate analysis for designation of Wild and Scenic Rivers.

All animal species are dependent directly or indirectly upon riparian zones. Some require healthy riparian zones during particular seasons of the year. Some such as native cutthroat trout are entirely dependent on these few remaining streams. Any stream with endangered cutthroat should automatically be placed among the rivers to be analyzed for suitability under the Wild and Scenic River Act. This would include segments of Lower Beaver Creek and La Sal Creek in the Moab Ranger District.

Wild and Scenic River designation could enhance the habitat of blue grouse, a move that is essential to maintaining viable populations on the Forest. (Letter 70, 117)

DNF – I believe that the Forest Service portion of Leeds Creek has five attributes and therefore that it should qualify as eligible.

Leeds Creek has outstandingly remarkable fisheries values, both in terms of the value and diversity of species. The lower portion of Leeds Creek has Virgin spinedace. This species has a conservation agreement, and all streams where it occurs are very important. Leeds Creek also has a unique population of Bonneville Cutthroat Trout (BVCT). BVCT are rare in Utah, and Leeds Creek provides the lowest elevation BVCT habitat in the entire state. The BVCT population in Leeds Creek is also extremely productive and self-sustaining. The Leeds Creek BVCT population was so abundant that it was used to transfer some fish to streams that received fire damage from 2000 to 2004.

Leeds Creek is primarily free-flowing. However, there are two main diversions. One is located downstream of the Forest Service boundary so it should not affect eligibility. The other is located far upstream on the Creek, near the Oak Grove campground. This too should not affect eligibility, because the study segment can be adjusted to remove it.

Therefore, in light of the preceding information, I formally request that Leeds Creek be found eligible and included in the DLEIS analysis for suitability.

I believe that three other Dixie National Forest stream segments were either overlooked or given short shrift during the eligibility evaluations: Ashdown Creek, (its major tributary) Rattlesnake Creek, and the Santa Clara River by the Pine Valley campgrounds. I reviewed the relevant web sites, but could not find where Ashdown and Rattlesnake Creeks were even listed as having been evaluated. Both of these streams on the National Forest are free-flowing. Both also have outstandingly remarkable scenic and recreational values. These streams are generally inaccessible except by trail; have generally pristine shorelands; and appear to have high water quality. They are located in the Forest Service's Ashdown Gorge Wilderness Area, and therefore should already be protected from any motorized uses or construction of developments. Indeed, it is astonishing that they apparently did not make the cut. If there were ever any potential WSR "slam dunks", these streams should qualify. Therefore, I strongly recommend that these streams be found eligible for their free-flowing and outstandingly remarkable scenic and recreational values, and considered for a wild classification because that is consistent with their pristine character and also their legal status in the midst of a statutory wilderness area.

For the Santa Clara River, I was disappointed that the segment (excluding the one dam and small impoundment lake) running through the Forest Service's Pine Valley campgrounds area did not make the cut. My family and I have used these campgrounds, and hiked along the river. I believe that this segment should be eligible for outstandingly remarkable scenic and recreational values. It is extremely popular and runs through campgrounds that are generally full throughout the summer months and on most holiday weekends. Many people hike along it and enjoy the beautiful scenery. While it is not in a pristine setting, it

should qualify for a recreational classification. It is important to protect this river segment from any future diversions, and to maintain its current beauty and healthy riparian habitats. Therefore, I formally request that this segment be found eligible and included in the DLEIS analysis. (Letter 162)

DNF – I ask the Forest Service to reconsider the apparent ineligibility findings for Leeds Creek, Ashdown Creek, and Rattlesnake Creek.

While Leeds Creek has some introduced non-native fish and water diversions, there are segments without diversions that provide outstandingly remarkable scenic and recreational values. There also appears to be strong local support for maintaining these values for the future.

Ashdown Creek and its tributary, Rattlesnake Creek, are located within the existing Ashdown Gorge Wilderness Area. These creeks possess outstandingly remarkable wild, scenic, and wildlife habitat values. Because they occur in a statutory wilderness area, there are no apparent land use conflicts with a further protective designation. I searched the Forest Service's relevant web sites and could find no reference to these creeks nor any explanation for why they are omitted from the scoping notice. Please correct this serious omission by reconsidering these creeks, and including them in this phase of the process for suitability evaluation. (Letter 206)

DNF – Ashdown Creek and its major tributary Rattlesnake Creek, within Dixie National Forest should be considered eligible. They are free-flowing and have outstanding wild value, as well as being scenic, free of impoundments, generally inaccessible by trail, have watersheds or shorelines essentially primitive, and unpolluted waters. (Letter 5)

DNF – (Cedar City District) I understand that Rattlesnake Creek and Ashdown Creek are not being considered for designation as Wild & Scenic but having hiked them numerous times with friends, I can't think of any more suitable. Ashdown Creek from the lower reaches of Cedar Breaks National Monument through pink and coral formations, and then the canyon with huge rock walls all the way to Coal Creek. Through its tributary, Rattlesnake Creek, with forest and huge boulders is even more spectacular than some of the rivers being recommended. Please consider these two waterways. (Letter 145)

MLSNF – Some drainages were dropped without considering some truly remarkable values. One example is the Fountain Green Creek/Maple Canyon Creek drainage. A remarkable and unique slot canyon lies within this area. As near as we can tell, this occurrence is significant on a global scale. Maple Canyon Creek received moderate ORV ratings for Scenic, Recreation, and Cultural qualities. Recreation was rated as Regional in importance. It is free-flowing. The Forest Service dramatically underrated Maple Canyon. Another example of a river dropped from study is Upper Salina Creek. The Forest Service concluded Upper Salina Creek had an ORV for wildlife with a moderate rating and a regional significance rating. This rating should have been sufficient to continue Upper Salina Creek forward into later phases of study. (Letter 70, 117)

MLSNF – I further support the inclusion of Butts, Arch and Texas Canyons as part of the National Wild and Scenic River System. These are also canyons that I have experienced personally and are treasures of the Manti-La Sal National Forest. Arch Canyon in particular is spectacular and is being degraded by the traffic allowed to travel it. These rivers are not only spectacular but also very fragile in the desert environments that they traverse and feed. (Letter 237)

MLSNF – *Scenic value.* Butts, Arch, and Texas Canyon have truly remarkable scenery that is close to the viewer, such as stair step ledges, and house sized boulders blocking the streambed. In addition, hikes can easily access dramatic vistas by climbing within the canyon. The scenery of the canyons are incredible. Vertical cliff walls, rim rock, outcrops, spires, alcoves, arches, deep gorges, and narrow valley floors are located in the Canyon. Two large arches (Angel Arch and Cathedral Arch) are located within ¼ mile of the corridor. (Letter 209)

Geologic value Vertical cliff walls, rim rock, outcrops, spires, alcoves, arches, deep gorges, and narrow valley floors are located in Butts, Arch and Texas Canyon and two large arches (Angel Arch and Cathedral Arch) are located within ¼ mile of the corridor. Furthermore, Arch canyon and Texas canyon are listed as a geologic point of interest for the Forest, and are described as having sculptured sandstone pinnacles.

Cultural value The significance, site integrity, education/interpretation, number of cultures and listing eligibility of the cultural sites in Butts, Arch, and Texas Canyon is definitely a high rating. The Forest Service portion of Arch Canyon is loaded with major archaeological sites. Many of the sites are eligible to be added to the National Register of Historic Places. There are many documented significant sites in the Canyon. There has never been a comprehensive survey of the Canyon, so there are many unknown/undiscovered archaeological sites in the Canyon. It is estimated that there are about 20 sites per linear mile and there is an extremely high potential for major sites in significant quantities in the Canyon. Arch Canyon is not just a locally important cultural resource. Arch Canyon is part of the Cedar Mesa archaeological phenomenon, which is during the Pueblo 2/3 phase of history. The Cedar Mesa archaeological phenomenon is recognized through out the nation by the general public and by professionals as a significant national resource. The spectacular cultural resources found throughout Arch Canyon, Hammond Canyon, Dark Canyon and other drainages originating in the Abajo Mountains are a fundamental component of Ancestral Puebloan adaptations focused on the nationally recognized Cedar Mesa ecosystem. This expression occurred primarily during Pueblo II and Pueblo III times, but also with evidence of earlier Basketmaker and later Numic and Athapaskan occupations. (Letter 209)

Cultural resources in these drainages are themselves nationally significant historic properties eligible for listing on the National Register under Criterion A in that they are associated with events that have made a significant contributions to broad patterns of history (the florescence and subsequent abandonment of the Four Corners by Ancestral Puebloan farmers), and under Criterion C in that architecture and rock art found here embodies distinctive characteristics of type, periods of time and method of construction that constitute a significant and distinguishable entity, even if components lack individual distinction. (Letter 209)

Wildlife Nesting Mexican Spotted Owls have been documented on the Forest in Texas Canyon and foraging in Arch Canyon. Because of these nesting owls there was a Protected Activity Center on the Forest down to the boundary of the Forest with BLM land. In February of 2001 critical habitat for the Mexican Spotted Owl was designated, which includes Arch Canyon. (Letter 209)

Fish The BLM portion of Arch Canyon provides habitat for the Flannelmouth sucker, listed as a Species of Special Concern by the State of Utah. There is potential habitat for the Flannelmouth sucker on the portion of Arch Canyon in the Forest. (Letter 209)

MLSNF – Ruin Canyon, Bull Canyon, and Calf Canyon – This canyon complex is classified as “Not eligible” by the MLSNF. We disagree. These canyons received a “moderate” rating of potential outstanding remarkable values, though the values it is rated moderate in are not listed. The canyons’ scale of importance is listed as “national”, which seems to contradict the moderate rating for unknown values that it is assigned. UEC, RRF, TWS and SUWA consider these canyons as being high in scenic, cultural, wildlife and geologic values. The canyons do contain a number of prehistorical Native American ruins, and are valuable Mexican spotted owl habitat. We recommend a Wild classification to the junction of trail 425 and a scenic classification above trail 425. (Letter 70, 117, 166)

Ruin Canyon received its name for a reason. There is no reason to eliminate this canyon from study within the boundaries of the Forest. Relatively short segments of Ruin, Bull and Calf Canyons lie with the Forest boundaries. All three watercourses are within an area where motorized travel is prohibited.

The views from the upper ends of these canyons are extraordinary with views into Beef Basin, House Park and Canyonlands National Park. Recreation in the canyons is primitive, solitary and unconfined. The three canyons rate high for Scenic and Wild values. There are not impediments to study under the Wild and Scenic Rivers Act.

Beef Basin Wash – The comments above apply to Beef Basin Wash. Beef Basin Wash is the major drainage coming off the northwest boundary of the Forest. (Letter 70, 117)

MLSNF – Southern Utah is a very harsh, desert environment. As such many rivers in southern Utah are either intermittent or ephemeral. Therefore, Butts, Arch, and Texas Canyon, with its intermittent flows is incredibly important for the entire area. The water that flows is vital for the survival of the vegetation and the local wildlife. Evidence of the importance of the water in the river is the presence of numerous cultural sites in the Canyon, demonstrating the importance of the river to older communities. These older communities could have lived anywhere, but they chose to live near the river for its important life sustaining water....Thus, Butts, Arch, and Texas Canyons play a crucial role in the ecology of the entire area and are major tributaries of the San Juan River. (Letter 118, 209)

MLSNF – Butts, Arch, and Texas Canyons are one of the most outstanding canyons in southern Utah. These canyons represent unique rivers in the United States, with their sandstone cliffs, walls, spires, and hot, dry desert environment in southern Utah. These canyons are representative of the area and rise above the rest due to the incredible scenery, geology, and cultural values (Letter 118, 209).

MLSNF – The rivers flowing from the Abajo Range in Manti-La Sal National Forest deserve protection as part of this wild region that links Canyonlands National Park with Cedar Mesa to the south. We urge consideration for WSR status of Butts-Arch-Texas Canyon complex (Scenic). (Letter 102)

MLSNF – CCHA urges the Forest Service to look closely into safeguarding the below-mentioned rivers, many of which flow from the Abajo Mountains in the Manti-La Sal National Forest here in San Juan County, on into Canyonlands or the Cedar Mesa area. These locales are rich in archaeological sites, and home to a host of flora and fauna desperately in need of protection. Your wise decision-making concerning the river corridors mentioned below could ensure these areas remain a treasure for all of our future generations. Arch, Butts and Texas Canyons - as we are certain you are aware, Arch Canyon is under intense scrutiny by a number of environmental and OHV organizations due to the amazing scenery and archaeological sites, and disputes about how precisely NOT to love the area to death. It is also a riparian habitat, crucial to wildlife, but sadly its waters are now consistently under siege by ATV users, with those numbers projected to rise dramatically over the next ten years. Inclusion of the headwaters of Arch, and its tributaries in Butts and Texas Canyons would assist in protection for this fragile, irreplaceable wonderland. We recommend these canyon streams be recommended for Scenic River Status in your study. (Letter 203)

MLSNF – Arch, Texas and Butts – Arch, Texas and Butts are among the top three or four hiking destinations in southern Utah for me, due to their scenic quality and geologic. Angel Arch and Cathedral Arch are beautiful and unique, and the canyons are full of dramatic rim rock, steep cliffs, and spires. On one trip we climbed up the side of Butts canyon and looked back down the canyons. That view still defines the drama of Utah's red rock country to me – Arch, Texas and Butts are the perfect representatives of what makes the scenery and geology of southern Utah so awe-inspiring, and should be protected for future generations to enjoy.

I am not as familiar with the cultural values of the canyons, but in my experience they rank high compared with other canyons. According to the Manti La-Sal's 2003 Eligibility Report, the canyons rank high in significance, site integrity, education/interpretation, number of cultures criteria for this value. Protecting Arch, Texas and Butts Canyons does not conflict with any proposed development or other management plans. Designating the creeks as Wild and Scenic will, if anything, help attract visitors to the area – generating additional tourism revenues in an area with a strong tourism economy. I ask that the Forest Service find these canyons suitable for Wild and Scenic status. (Letter 210)

MLSNF – Abajo Mountains section:

- Arch Canyon, Butts Canyon, Texas Canyon - We hiked into Arch Canyon in the BLM section and enjoyed the perennial stream and its riparian habitat. We also saw damage caused by off-road vehicles in Arch Canyon. We were aware that the Forest Service manages the headwaters of Arch Canyon and its tributaries Butts and Texas Canyons. We urge that these canyon streams be recommended for Scenic

River status in your study. The three form an important complex of wild land that will see increasing visitor use in the years ahead.

- Harts Draw, Indian Creek - These two are long canyons that flow north into Canyonlands National Park. There are highly valuable proposed wilderness areas along them in the BLM segment. The Forest Service manages the headwaters. We urge that these be recommended for Wild or Scenic status under the WSR Act.
- Stevens Canyon, Davis Canyon - This complex also leads into Canyonlands National Park, analogous to Lavender Canyon nearby. The headwaters in the national forest should be considered for Wild or Scenic status. (Letter 99)

MLSNF – Lower Indian Creek, Upper and Lower Hell Canyon – Hell Canyon (upper and lower) are rated as low in potential outstanding remarkable values and regional in scale of importance. Both portions of the canyon are considered not eligible for Wild and Scenic River designation. RRF, TWS, and SUWA believe these canyons are high in scenic, geologic and ecological/biological diversity and should be considered eligible. We recommend the portions of the canyon located between Road 073 and Road 699 be classified as wild. (Letter 70, 117, 166)

MLSNF – I am outraged that ten wild river study segments have been dropped from consideration in Manti-La Sal NF. These rivers are being unfairly compared to the Grand Canyon. Nothing can compare with the Grand Canyon. The rivers have high scenic and cultural values. I hope these rivers can be added back to study status to protect their scenic, recreational, wildlife, and primitive values. (Letter 135)

MLSNF – Although we realize the following three river segments are not included in your notice, we do urge your consideration of:

Indian Creek - which flows into Canyonlands National Park, and has many proposed wilderness areas within the BLM segment, while the Forest Service manages the headwaters. We propose this under Wild or Scenic status.

Stevens-Davis Canyons Complex - also leads into Canyonlands. The headwaters should be considered for Wild or Scenic status.

Harts Draw - again, flows into Canyonlands, and again, includes BLM proposed wilderness areas. WSR status.

We respectfully ask the Forest Service to recommend all of the outstanding rivers on national forests in Utah as suitable for Wild and Scenic River protection. (Letter 203)

MLSNF – We notice other river segments in the Abajos are not listed in your notice. We urge consideration of three segments that flow north into Canyonlands National Park: Harts Draw, Indian Creek, and the Stevens-Davis Canyons complex. (Letter 102)

MLSNF – Six Mile Canyon, including North and South Forks – The Six Mile Canyon Scenic ORV changed from H to M. The SOI changed from National to Less than Regional. This degree of change is beyond belief. How could resource specialists have been so far off in their initial evaluations? Changing this evaluation at this point in the analysis could only be an arbitrary and capricious decision. In addition Six Mile Canyon was changed to not free flowing. Since other rivers remain on the list for suitability analysis this would not necessarily preclude this river from that level of study. In fact the language of the Wild and Scenic Rivers Act would not indicate that this would be a cause for removal from a list of rivers to be studied for suitability. (Letter 70, 117)

Twelve Mile Canyon, including Headwaters of S. Fork of Twelve Mile, S. Fork of Twelve Mile, and Cooley Creek – The Twelve Mile Canyon Scenic ORV was changed from H to M, the SOI changed from R to L, and the Geologic ORV SOI changed from N to L. No explanation was made for making the changes. The change from National to Less than Regional for geologic is a huge leap to make without specific justification. (Letter 70, 117)

Manti Canyon, including N. Fork, Lowry Fork, Middle & South Forks – The description for this river changed. Scenic ORV changed from H to M, SOI changed from N to L; Recreation ORV changed from H to M, SOI changed from R to L; changed to not free flowing. (Letter 70, 117)

Ephraim Canyon, including White Fork Ledge & Cottonwood Creek – Ephraim Canyon Scenic, Recreation, and Historic ORVs changed from H to M, SOIs changed from N to L (not free flowing). (Letter 70, 117)

Fairview Canyon – Scenic and Recreation ORVs was changed from H to M, SOI changed from N to R. The ORV should remain with a High ranking. Fairview Canyon is a Scenic Byway. This canyon is often visited purely for the esthetics of the canyon. There are no impacts that should cause the ORV ranking to decline. Fairview Canyon is historically significant. An early Forest Service field research station is in Fairview Canyon. The connection with Huntington Creek and Canyon add to the value of Fairview Canyon for both Scenic and Recreational ORVs. (Letter 70, 117)

Lower Muddy Creek, including S. and N. Forks – This portion of the river is recommended for Recreational classification. It is considered to be high in cultural values. UEC, RRF, TWS and SUWA believe the area is also high in scenic values and wildlife values and the Manti-La Sal National Forest website even states the area is potential Mexican spotted owl habitat. The area serves as a corridor for mule deer and elk between summer and winter ranges.

We recommend the classification be upgraded to Scenic except for the portion above the end of road 042, which should be upgraded to Wild. (Letter 70, 117, 166)

Cultural ORV SOI was changed from R to L. This change is unwarranted. While there are globally significant cultural sites in the area, Muddy Creek remains significant on a regional level. This is a continuous waterway connecting the desert and the mountains and was used by prehistoric peoples for movements between elevations. There are undoubtedly many undiscovered archaeological sites along the river. Such sites are abundant and remarkable at lower elevations and undoubtedly will be found along the segment studied for designation under the Wild and Scenic Rivers Act. (Letter 70, 117)

Upper Ferron Creek, including N. Fork of Big Bear Creek, Cove Creek, Georges Fork, Lake Fork of Upper Ferron Creek & Indian Creek – The Manti-La Sal National Forest considers this area to be high in wildlife values. It is currently recommended for a Recreational classification. UEC, RRF, TWS and SUWA believe the area also is high in scenic values and recreational values. There is a jeep trail and ATV trails cross portions of the creek. We believe the creek meets the standards for a Scenic classification. (Letter 70, 117, 166)

Spring Creek – This creek segment is above Huntington Reservoir. The Forest Service has indicated the creek is high in both scenic and wildlife values. We would add fisheries to the list of values the creek ranks high in due to the presence of an archaic, genetically pure population of Colorado cutthroat trout within the creek above the reservoir. We would also consider the creek to be high in ecological/biological values and paleontological value due to the discovery of a woolly mammoth during construction of Huntington Reservoir.

Spring Creek is recommended for Recreational classification. Due to the presence of a pure Colorado cutthroat trout population and the other values listed above, and the absence of any roads or trails adjacent to or crossing the creek, we would recommend a Wild classification for the portion of the creek from the reservoir to the headwaters. (Letter 70, 117, 166)

Black Canyon – Forest Service recommendation is for Scenic classification. Area is considered high in wildlife values. RRF, TWS and SUWA also consider the area to be high in scenic values and recreational values. The area in question is semi-primitive non-motorized access only according to the Travel Plan. We recommend a Wild classification for this river. (Letter 70, 117, 166)

Reeder Canyon & Littles Creek – The Forest Service recommended all of these watercourses for Recreational classification. All are also considered high in wildlife value. RRF, TWS, and SUWA recommend a Wild classification from Road 011 to headwaters. (Letter 70, 117)

Straight Canyon – Straight Canyon was changed to not free flowing yet Huntington Creek remained in analysis. Both canyons have flowing water with impoundments meant to maintain that flow. Straight Canyon should be designated as Scenic. The evaluation of Straight Canyon for whitewater recreation changed. The given reason for this was the brief whitewater season. Yet it can be the very rarity of the experience that

increases the value of a river for whitewater kayaking. (This should seem apparent in a capitalist economy.) (Letter 70, 117)

Upper Huntington Creek & Boulger Creek – Fish ORV changed from H to M. Upper Huntington Creek remains an excellent fishery so how could the ORV rating drop? (Letter 70, 117)

Upper Left Fork of Huntington Creek, including Millers Flat, Spring Canyon, Lake Canyon, Rolfson Canyon, Staker Canyon, Jordan Canyon & Seeley Canyon – The Forest Service considered these creeks high in scenic and wildlife values. We would add fisheries, ecological/biological diversity, recreational, and paleontological values. As with Spring Creek, the discovery of a woolly mammoth nearby renders the area potentially high in paleontological values.

These creeks are currently recommended for Recreational classification. For Lake Creek and Rolfson Creek we would recommend a Wild classification. For Staker Creek, we recommend Wild classification from road 014 to headwaters. (Letter 70, 117, 166)

Forest Service recommendation was for Recreational classification within Jordan and Seeley Canyons. The area is considered high in both scenic and wildlife values. We believe the area is also high in fisheries and recreational values. Only non-motorized trail access is available according to the Travel Plan. UEC, RRF, TWS and SUWA recommend Wild classification between road 014 and the headwaters. (Letter 70, 117, 166) Upper Left Fork Scenic and Wildlife ORV was changed from H to M. This was an arbitrary decision. (Letter 70, 117)

Scad Valley – Wildlife ORV changed from H to M. What could have changed this rating? This was an arbitrary decision unsupported by the Final Eligibility Report. (Letter 70, 117)

Bob Wright Canyon and Second Water Canyon – The Forest Service recommends all of these watercourses for Recreational classification. All are also considered high in wildlife value. UEC, RRF, TWS, and SUWA recommend a Wild classification from Road 011 to headwaters. (Letter 70, 117, 166)

Bennion Creek – Bennion Creek receives no recommendation by the Forest Service. There are no trails and the creek is within a motorized restricted area. We believe the area is high in wildlife value. UEC, RRF, TWS, and SUWA recommend a Wild classification for Bennion Creek. (Letter 70, 117, 166)

North Fork of Whiskers, including Whiskers Draw – RRF, TWS, and SUWA support the descriptions in the *Final Eligibility of Wild & Scenic Rivers – Manti-La Sal National Forest*.

Boles of Douglas fir can be found at elevations lower than expected in this canyon indicating a shift in moisture and/or temperatures for the area during previous centuries.

Whiskers draw is seeing excessive off-road vehicle use on the BLM portion. If the offroad vehicles have not yet reached the Forest boundary they soon will. A wild designation would help control off-road vehicle use. (Letter 70, 117)

Notch Canyon – RRF, TWS, and SUWA support the descriptions in the *Final Eligibility of Wild & Scenic Rivers – Manti-La Sal National Forest*. We also make the following comments in addition to those in the report.

Notch Canyon is recommended for “Scenic” classification from the headwaters to the forest boundary.

According to the map of eligible stream segments included in the earlier scoping packet, the portion of Notch Canyon considered eligible does not extend to the forest boundary.

Unlike Hammond and Arch Canyons, there is no trail system within Notch Canyon indicated on the Manti-La Sal National Forest Travel Plan. Notch Canyon also lies within a semi-primitive non-motorized area. Notch Canyon is ranked high in outstanding remarkable values for scenic, geologic, hydrologic and cultural values. It is ranked “national” in scale of importance and is free flowing. Notch Canyon also represents excellent Mexican spotted owl habitat.

There is no conflict preventing the classification of Notch Canyon as “Wild”. We urge the Manti-La Sal National Forest to change its recommendation from “Scenic” to “Wild” designation for this canyon. (Letter 70, 117, 166)

Red Rock Forests also proposes Notch Canyon including the Hammond Canyon drainage for wilderness study during the M-LS NF Plan Revision. The roadless character of the canyon makes this an ideal river for designation as Wild.

There have been sporadic attempts to enter Notch Canyon by off-road vehicle riders. Designation under the Wild and Scenic Rivers Act should help in controlling illegal use of off-road vehicles.

Notch Canyon is prime Mexican spotted owl habitat. Protection of the riparian zone is crucial to the continued viability of Mexican spotted owls. (Letter 70, 117)

Posey Canyon – RRF, TWS, and SUWA support the descriptions in the *Final Eligibility of Wild & Scenic Rivers – Manti-La Sal National Forest*. We also make the following comments in addition to those in the report.

Posey Canyon is currently recommended for Recreational classification. RRF, TWS AND SUWA recommends Wild classification in this case. Posey Canyon is listed together with Chippean and Allen Canyons as ranking high for scenic, geologic/hydrologic and cultural values and is considered national in its scale of importance. It is also free flowing and contains excellent Mexican spotted owl habitat.

ATV use within the canyon, if any, is illegal as the trail running through the canyon is designated “non-motorized” on the Manti-La Sal National Forest’s Travel Plan. Therefore, under the criteria provided, no conflict with a Wild classification appears to exist. The Cottonwood Wash Watershed Improvement and Mine Reclamation also kept this canyon closed to motorized recreation. (Letter 70, 117, 166)

Protection of Posey Canyon is crucial to the expansion of populations of Mexican spotted owls. Mexican spotted owls generally do not travel huge distances from the nesting area of origin. Posey Canyon is a bridge habitat for expansion of Mexican spotted owls into the Chippean and Allen Canyon area. (Letter 70, 117)

Butts, Arch and Texas Canyons – RRF, TWS, SUWA support the descriptions in the *Final Eligibility of Wild & Scenic Rivers – Manti-La Sal National Forest*. We also make the following comments in addition to those in the report.

In the case of these three canyons, only Arch Canyon has a trail running through it. The Arch Canyon Trail terminates at the northern end of the canyon and appears to begin on BLM land south of the forest boundary. The entire complex is closed to motorized access on the Manti-La Sal National Forest Travel Plan. As with Hammond Canyon, all three canyons are free flowing and are listed as “National” in scale of importance. All three canyons are also listed as “High for Scenic, Geologic/Hydrologic & Cultural” values. The area is excellent Mexican Spotted Owl habitat as well.

The Arch/Texas/Butts Canyon complex is located almost entirely within the Arch Canyon Inventoried Roadless Area. According to the analysis prepared for this area prior to finalization of the current LRMP, “There are no known recent (past 100 years) man made structures in the area” and ORV use has been largely limited to “above the rim” of the canyons. “Special features” in the area “include hanging gardens, an eco-niche, the arches, the archeology, and the massive sandstone canyon wells.”

The Manti-La Sal National Forest has three options within this area: 1) All three canyon segments could receive “Scenic” classification as currently recommended; 2) The Arch Canyon segment could be classified as “Scenic” with Butts and Texas Canyon portions classified as “Wild” or; 3) All three canyons could be classified as “Wild”. Of these options, the later two make more sense given the facts in this case than the recommendation to classify all three canyon river systems as “Scenic”. RRF, TWS, and SUWA endorse a Wild recommendation for all three canyons. (Letter 70, 117, 166)

Upper North Cottonwood, including Reservoir Canyon, Vega Creek, Blue Creek, Tuerto Creek, Trough Canyon and Hop Creek – These creeks and associated canyons are classified as not eligible for wild or scenic river designation. They receive a rating of moderate for unknown outstanding remarkable values, but are considered national in scale of importance, which again appears to be contradictory.

UEC, RRF, TWS AND SUWA consider these canyons to be high in scenic, wildlife, geologic and possibly cultural values. They include critical Mexican spotted owl habitat and are known to contain a large population of black bear. We would also consider these canyons high in ecological/biological diversity.

These canyons are mostly or entirely invisible from any road where motorized use is allowed, and must be hiked into in order to be experienced. A classification as wild seems justified in this case. (Letter 70, 117, 166)

Shay Canyon and Titus Creek – These canyons are rated as low in outstanding remarkable values and regional in scale of importance. They are currently considered not eligible for wild or scenic river designation. RRF, TWS and SUWA consider these canyons high in wildlife value (located just outside of critical Mexican spotted owl critical habitat), geologic/hydrologic values, and scenic values. It is entirely possible these canyons also contain cultural resources.

Shay Canyon does have a motorized trail that runs through the canyon for a very short distance, but is not of sufficient length to preclude classification of the canyon as Wild in our view. Titus Canyon has no such conflict, however, and should be classified as Wild. (Letter 70, 117, 166)

Upper Fisher Valley – This area is rated as moderate in potential outstanding remarkable values and regional in scale of importance. It is not considered eligible for classification as Wild, Scenic or Recreational. UEC, RRF, TWS, and SUWA believe this creek possesses high scenic values and is high in ecological/biological diversity. We recommend Wild Classification for this creek. (Letter 70, 117, 166)

Lower Fisher Valley Creek and Bull Canyon – These creeks receive the same rating and scale of importance rank as Upper Fisher Valley Creek. UEC, RRF, TWS, and SUWA believe this area to be high in scenic qualities and ecological/biological diversity. We see no conflicts that would preclude classification as Wild. (Letter 70, 117, 166)

Lower Beaver Creek – The handling of this watercourse demonstrates some inconsistency in the review process. The river is ranked “High for Wildlife” but is “Less Than Regional” in scale of importance. Other segments that are ranked as low or moderate have been considered regional, or even national in scale of importance.

In addition to being “high” for wildlife, UEC, RRF, TWS, and SUWA believe the area is high in scenic, geologic/hydrologic, and ecological/biological diversity. There is no motorized access to the Forest Service portion of Beaver Creek. We recommend Wild classification for this stream. (Letter 70, 117, 166)

Mary Jane Canyon and Bunchground – These creeks were dismissed on the grounds there are “no known Outstandingly Remarkable Values.” We disagree. We believe the area has outstanding scenic qualities, geologic values and is high in ecological/biological diversity. The canyons contain Wingate Sandstone with conifers, which rarely occur together, and is potential habitat for Mexican spotted owl. UEC, RRF, TWS, SUWA recommend Wild classification up to roads 601 to 619 for Mary Jane Canyon and Bunchground respectively. (Letter 70, 117, 166)

Miners Basin – RRF, TWS and SUWA support some of the findings in the *Final Eligibility of Wild & Scenic Rivers – Manti-La Sal National Forest*. We also make the following comments in addition to those in the report. The wildflowers provide another layer of color and beauty to the scenic qualities noted in the report. While there is a road entering Miner’s basin portions of the road are difficult to drive. Visitation is low. It is unfortunate from an ecological perspective that the road remains open. We recognize that closing the road is not possible since it is established and leads to private property. Still the nature of the road helps keep the area in a primitive condition that should be given whatever form of protection can be found. We would suggest that Miners Basin receive recommendation for both Scenic and Recreational designation. (Letter 70, 117)

WCNF – Please protect the Little Dell (Letter 39).

Appendix A – List of Agencies/Organizations and Letter Number

	Letter Number
The Navajo Nation, Historic Preservation Department – Traditional Culture Program	250
Federal Agency	
U.S. Department of the Interior, Bureau of Reclamation	224
U.S. Department of the Interior, Bureau of Land Management	223
U.S. Department of the Interior, Central Utah Project	208
U.S. EPA	210
State Agency	
State of Utah, Office of the Governor, Division of Wildlife Resources and Utah Geological Survey	74
State of Utah, Department of Transportation and Division of Water Resources	158
State of Utah, Public Lands Policy Coordination Office	266
UDOT Region 4 Environmental Engineer	25
County Agency	
Carbon County, Public Lands Department	10, 207
Cache County, County Executive	221
Daggett County Commissioner	57, 105
Daggett County Commissioners	148
Duchesne County Commissioners and Community Development Administrator	19, 124
Emery County, Public Lands Department	153
Garfield County Engineer	79
Iron County Commissioners	16
Kane County Commission	110
Millard County Commission	217
San Juan County Commission	252
Sanpete County, Economic Development and Travel	1
Sanpete County, Commission Chair	222
Sevier County Commission	126
Summit County Commissioners	24
Sweetwater County Commission (Wyoming)	165
Uinta County Commissioners (Wyoming)	81
Uintah County Commission (Utah)	211
Utah County Commission	150
Wasatch County Council	17
Wasatch County, Public Lands Committee	29
Washington County Commission	149, 268
Association of Governments	
Five County AOG	122
Mountainland AOG	152
Cities/Towns	
City of Monticello, City Manager	259
Kamas City	151
Monticello City, Councilman	260
Salt Lake City, Public Utilities, Water Resources Scientist	107
Town of Alta, Mayor	111
Organizations	
Alta Ski Area	104
American Rivers	118

	Letter Number
Aspen Grove Family Camp and Conference Center	52
Bear River Watershed Council	112
Canyon Country Heritage Association	203
Castle Valley Special Service District	18
Center for Water Advocacy	108
Central Utah Water Conservancy District	142
Dalton Ranches	247
Dry Gulch Irrigation Company	123
Duchesne County Water Conservancy District	55, 76
High Uintas Preservation Council	50, 80, 267
Howard County Bird Club	102
Huntington Cleveland Irrigation Company	77, 78
Johnson Water District	136
Kane County Water Conservancy District	109
Larsen Livestock, Inc.	129
Moon Lake Water Users Association	164
National Outdoor Leadership School	116
Nature Education Programs, Ltd.	212
Nordic United	114
Ouray Park Irrigation Company	157
PacifiCorp Energy	163
Provo River Water Users Association	218
Red Rock Forests	70
Sanpete Water Conservancy District	125
Sweetwater County Conservation District and Uinta County Conservation District	165
Uinta County Citizens Coalition for Sound Resource Use	54
Uintah Water Conservancy District	71
USU Water Quality Extension	115
Utah Chapter Sierra Club	117
Utah Environmental Congress	166
Utah Farm Bureau Federation	219
Utah Rivers Council and Center for Biological Diversity	209
Utah Rivers Council, OARS, Wasatch Mountain Club, Holiday Expeditions, Utah Whitewater Club, Sherri Griffith Expeditions, Outward Bound Wilderness, Western River Expeditions, River Runners Transport, Grand Canyon Trust, Desolation Outfitters, Canyon Voyages, Black Dog Shuttle and Expedition Support, Red River Canoe Company, Western River Flyfishers, Western River Expeditions, Colorado River and Trail Expeditions, Dinosaur River Expeditions, Trout Creek Flies	202
Washington County Water Conservancy District	154
Western Wildlife Conservancy	155, 204
Winter Wildlands Alliance	106
All Other Letters Were Submitted by Individuals	

Appendix B – Coding Structure used to Categorize Comments

Subject	Subject Code	Category Code	Definition
Suitability Factors	SF	100	General comments.
		101	1) Landownership and land uses
		102	2) Existing and potential water resources development
		103	3) Existing and potential transportation, facilities, and other developments
		104	4) Existing and potential mineral and energy resource activities
		105	5) Existing grazing activities
		106	6) Existing and potential recreation activities
		107	7) Other existing and potential resource activities (e.g.: farming activities, current or potential vegetation management projects, recreation facilities or trail projects)
		108	8) Existing or potential special designations
		109	9) Socio-economic environment
		110	10) Current administration and funding needs if designated
		111	11) The extent to which the State or its political subdivisions might participate in the shared preservation and administration of the river, including costs
		112	12) The state/local government’s ability to manage and protect the outstandingly remarkable values on non-federal lands.
		113	13) Support or opposition to designation.
		114	14) The consistency of designation with other agency plans, programs or policies and in meeting regional objectives.
		115	15) Contribution to river system or basin integrity.
			116
	117	17) Other.	
	117a	17) Birds, wildlife, fish, and/or aquatic species.	
	117b	17) Scenery and/or geologic features.	
	117c	17) Cultural and/or historical.	
Wild and Scenic Rivers	WSR	200	General comments.
		201	Designate all rivers.
		202	Designate some rivers.
		203	Do not designate any rivers.
		204	Do not designate specific rivers.
		205	Protected by law or more protective designation already in place.
		206	Human made structures and human activities (that have impacted the landscape) in the area.
		207, 209, 211	Changes to: the determination of eligibility; wild, scenic, or recreation classification; and/or to outstandingly remarkable values (ORVs) for segments being studied in the suitability study.
		208	Free flowing character.
		210	Regional or national significance of ORVs.
		212	Water rights.
		Process	PROC
901	Authority of Agency.		
902	Compliance with laws/ regulations/ Interim Directives.		
903	Public Involvement.		
904	Eligibility/Inventory.		
905	Cooperating Agency.		
906	Alternative development.		