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Comments:

Comment on FW-DC-AQTC-01

I don't believe that the monitoring plan supports this desired condition. It does not go far enough in committing to establishing baseline physical and biological conditions across the GMUG through sampling, assessment and monitoring of these characteristics? This has been done successfully through bioassessment (macro-invertebrate sampling) and sediment (pebble counts) analysis for baseline departure analysis by the White River National Forest.

## Comment on FW-STND-AQTC-05

Feel that the standard is excluding the aquatic organism passage conservation measure for desired streams that either have non-native fishes or are not documented as having native fishes. Should read similar to: "Unless the accommodation would increase non-native species encroachment on native fish and amphibian habitat; new, replacement, and reconstructed crossings (culverts, bridges, and other stream crossings) and in-stream structures (impoundments, diversions, and weirs) on perennial streams and on intermittent streams, will accommodate flood flows and allow aquatic organism passage for ALL aquatic and semi-aquatic species NOT just native species. (Also need to add cutthroat trout to native list of fishes).

## Comment on FW-GDL-SPEC-22

This guideline does not go far enough to prevent water developments in the areas where there are known boreal toad breeding. This should be a standard, otherwise water development could potentially affect boreal toad populations such as Buzzard Creek. Because there are very few documented breeding sites on the GMUG, which indicates how important the ones present really are, this would not be overly burdensome as a standard, yet provide much more protection for the Species of Conservation Concern, boreal toad in those areas.

## Comment on FW-GDL-SPEC-57

Similar to comment on FW-DC-AQTC-01, how do you determine that there is a reduction in sediment delivery without proper monitoring plan and assessment

## Comment on Monitoring Plan

In your monitoring plan you outline status and trend of aquatic and riparian ecosystem integrity on the GMUG, however there is no mention of how you will establish baseline conditions across the GMUG or relate these conditions to already available data to conduct departure analysis, short of State of Colorado partners. CDPHE is limited due to the shear amount of streams and rivers and generally conducts assessment only on as needed basis. CDPHE also relies heavily on land management agencies to assist in providing baseline conditions, assessment and monitoring. The budget and capacity restraint is not valid reason for not conducting assessment and monitoring at the forest level because other National Forest in the region do have similar programs.

Furthermore y, in your Draft EIS your reference the Key Ecosystem Characteristics - Aquatic Ecosystems. Specifically, the assessment uses aquatic species distribution and abundance with relation to aquatic macro-invertebrates as an index of biological integrity; however in your forest monitoring plan you do no propose to continue use of bioassessment as a monitoring tool. The Forest Monitoring Plan should include a detailed plan of how aquatic and riparian ecosystem integrity will be assessed and maintained. Recommend bioassessment and sediment monitoring.

Does the Plan or DEIS outline where motorized watercraft can be used? and if so what type? gasoline vs. electric vs. non-motorized