



Sent via email to: [gmugforestplan@fs.fed.us](mailto:gmugforestplan@fs.fed.us)

December 7, 2016

Sam Staley  
Forest Planner  
Grand Mesa, Uncompahgre and Gunnison National Forests  
Attn: Plan Revision Team  
2250 South Main Street  
Delta, CO 81416

**RE: Draft Assessment Reports**

Dear Ms. Staley,

Please accept the following comments from Trout Unlimited (TU) on the Grand Mesa, Uncompahgre, and Gunnison National Forest's (GMUG) Draft Assessments Reports. We appreciate the Forest Service's invitation to participate in the planning process and for working with TU and other stakeholders in the management of our public lands.

Trout Unlimited is the nation's oldest and largest coldwater conservation non-profit organization with more than 150,000 members nationwide dedicated to conserving, protecting and restoring North America's trout and salmon fisheries and their watersheds. Since 1959, TU staff and volunteers have worked toward the protection of sensitive ecological systems necessary to support robust native and wild trout populations in their respective ranges. We recognize the high value of public lands and the role public lands play in providing habitat to coldwater fisheries, drinking water, and wildlife habitat. Trout Unlimited believes that the actions taken on public lands are ultimately reflected in the quality of fish and wildlife habitat and their populations.

In Colorado, TU plays a critical role in watershed conservation, restoration, and rehabilitation on public lands, particularly our Forests. Twenty-four chapters and 11,000 members statewide actively participate in projects with the National Forest, local communities, and private landowners in order to maintain the larger important forest landscape that is so vital to the social and economic community in this area. Neighboring the GMUG are five TU chapters: Gunnison Gorge Anglers based in Montrose, Gunnison

Angling Society in Gunnison, Grand Valley Anglers in Grand Junction, San Luis Valley Chapter, and the Ferdinand-Hayden Chapter out of Carbondale. All these chapters have a long term relationship with the GMUG National Forest.

The GMUG is host to the a large portion of currently occupied habitat for a truly unique and native fish – the Colorado River cutthroat trout (CRCT). Because these fish are only found in specific and limited places, protection of their watersheds and habitats are especially important. Colorado River cutthroat trout have adapted to this region for eons; they are a part of our culture and angling heritage. Trout Unlimited has worked on CRCT issues consistently over many years, and we are excited to take advantage of this opportunity in the planning process to ensure even better protections for these fish.

### *Designated Areas*

Trout Unlimited recognizes the importance of a variety of different designated areas on a Forest landscape. We support the use of geographic and management areas specifically in the GMUG plan revision. Through more strict protections where warranted, and through thoughtful protections where multiple uses occur, TU suggests that the GMUG pursue a variety of designations for waterways. TU also recognizes the importance of restoration and would like to see areas on the Forest where watershed restoration is a focus. In general, TU would like to see creative and pragmatic uses of designated areas on the GMUG, both administratively and in consideration of future legislation. Specifically, Trout Unlimited supports the GPLI initiative, to which TU originally submitted a proposal and continues to be strong partner in.

### *Watersheds, Water and Soil Resources*

The Watersheds, Water, and Soil Resources assessment shows the most recent Watershed Condition Class ratings. Trout Unlimited has many times been a proponent of using as fine of a scale as possible for these types of analyses. We'd suggest that the finding of zero Class 3 watersheds is incorrect when viewed from the ground. Trout Unlimited has identified several candidates for places where severe degradation of watershed function can be documented. We suggest that the GMUG follow the lead of the Rio Grande National Forest and use a HUC level 12 for the Watershed Condition Class in the draft plan revision. This would be useful to adhering to desired conditions and in the designation of Priority Watersheds.

### *Aquatic and Riparian Ecosystems*

Page 7 of the Aquatic and Riparian Ecosystems Assessment has two somewhat contradictory statements. Paragraph 1 states “There is no evidence to suggest that current or future land management activities or other human impacts will affect the amount of habitat available to cold-water fishes”. The third paragraph says, “Future management activities may impact stream and riparian habitat conditions in streams supporting aquatic species.” Trout Unlimited believes that habitat condition can affect amount of habitat and that most certainly human impacts and land management have a great deal to do with both. TU prides ourselves on the positive impact humans can have on the landscape, and have been privilege to be partners to the GMUG in numerous restoration projects on the Forest. We strongly suggest that human impacts and management implications be analyzed in more depth, and that the Forest Plan revision reflect these possible impacts.

In response to the *Fragmentation of Aquatic Habitat* section, Trout Unlimited would like to point out that infrastructure, although important to connectivity, is not the only possible barrier to aquatic species. Habitat condition and degradation can be as much a concern, as can water management. Thermal barriers can also be a real concern. Similarly, genetic connectivity should be accounted for. Lastly, water quantity can be a barrier to fish and aquatic species. Table 4 of the Aquatic and Riparian Ecosystems Assessment shows a number of Functioning at Risk and Impaired aquatic ecosystems, and that same section recognized human's impacts on water quantity. In general, Trout Unlimited would like to see a more thorough analysis of habitat connectivity in coldwater fisheries used in the Draft Plan Revision going forward.

Plan management direction going forward would be valuable to continue assessing. The R2 system previously used is out of date and there are many new tools which TU would support using in the new GMUG plan revision. The use of tools such as Riparian Management Zones, and Conservation Watershed Network for Native Fish are priorities of the Forest Service that fall under a comprehensive Aquatic and Riparian Conservation Strategy that would be of use in the future plan direction on the GMUG.

A Conservation Watershed Network for Native Fish (CWN) is a model recently set forth in the Flathead National Forest's Draft Revised Forest Plan<sup>1</sup> as an approach to establishing conservation watersheds for native fish preservation. This watershed based tool, analyzed forest wide, is defined as "a collection of watersheds where management emphasizes habitat conservation and restoration to support native fish and other aquatic species. The goal of the network is to sustain the integrity of key aquatic habitats to maintain long-term persistence of native aquatic species."

Complementing the Conservation Watershed Network, the Flathead National Forest Draft Revised Forest Plan also established a detailed plan component for Riparian Management Zones<sup>2</sup>. These Zones act in concert with the Conservation Watershed Network to provide the best possible management direction towards meeting the forest-wide goals of the GMUG Forest plan revision and the 2012 forest planning rule's direction to maintain and restore ecologic integrity of aquatic ecosystems and watersheds.<sup>3</sup>

Trout Unlimited would support the GMUG proposal to use the monitoring of fish populations at the Forest level in addition to macroinvertebrates. Although we believe in the holistic management of watersheds and fisheries, we think that fish can stand as indicators in most cases and that partnership opportunities in this monitoring are ripe. We suggest the development of standards, guidelines, desired conditions to this fish focused end, and the use of partnerships to define and carry these out.

#### *Colorado River Cutthroat Trout*

Trout Unlimited appreciates the lengths the GMUG has gone to assess the CRCT and looks forward to incorporating this work into meaningful plan components going forward. We would like to be considered partners in regard to these native trout issues specifically. Trout Unlimited looks forward to reviewing and commenting on the at-risk species assessment.

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<sup>1</sup> [http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd502201.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd502201.pdf)

<sup>2</sup> Flathead National Forest Draft Revised Forest Plan, p 21-23.

<sup>3</sup> 36 CFR 219.8(a)(1)

*Partnership*

Trout Unlimited would like to be considered a partner to the Forest Service in the Forest plan revision and on the ground implementation of forestry and watershed health related projects over the course of the final plan. We hope that through this process and through thoughtful partnerships a mutually beneficial relationship in the management of our public lands can be a new normal.

Thank you for considering these comments in the analysis of the Draft Assessment Reports on the GMUG National Forest. Trout Unlimited hopes to be a partner to Forest Service and other user groups in future land management on the GMUG National Forest.

Sincerely,



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