



Sent via email to: gmugforestplan@fs.fed.us

June 1, 2018

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

RE: Scoping Comments on the Grand Mesa, Uncompahgre, and Gunnison National Forests' Plan Revision

Dear Ms. Staley,

Please accept the following scoping comments from Trout Unlimited (TU) on the Grand Mesa, Uncompahgre, and Gunnison National Forest's (GMUG) Forest Plan Revision process. 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 300,000 supporters and 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 and restoration 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 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.

Forest Plan Vision, Roles and Contributions

The GMUG is becoming more and more popular as a destination forest for all types of recreational pursuits. In order to be a healthy forest, we support the GMUG's desire to adapt, integrate and effectively work toward common goals with all its partners. We also understand that staffing, funding, and timing all play key roles in the ability to meet these roles and contributions.

Trout Unlimited has reviewed this section and offer the following recommendations for strengthening the management components of this plan.

Recreation Economy

In April 2018 the Outdoor Industry Association released a study that brought regional focus to the economic contribution of outdoors¹. In Colorado's 3rd Congressional District, outdoor recreationists spent approximately \$4.0 billion. A similar report released by Colorado Parks and Wildlife² indicated a statewide economic contribution from angling at \$1.9 billion and \$920 million from hunting. This results in an overall \$2.8 billion just on angling and hunting sports—with approximately 53% of that occurring in the 3rd Congressional District. Such activities places a heavy burden on the GMUG to maintain its health and attractiveness.

Outdoor recreation and its diverse economy must be a major consideration in the plan components. Without the benefits of cold clear streams for trout fishing and robust and healthy terrestrial habitat for hunting, these activities could be jeopardized. The scoping document fails to mention the importance or significance of this economic driver. The importance of the outdoor recreation industry is growing and will continue to be a major contributor to forest use and neighboring communities surrounding the forest. We recommend a stronger role be defined in the management components in the Needs for Change.

Key Needs for Change

In the Needs for Change discussion, we find a lack of attention to what several items we believe are major issues that should be included in the plan revision. They include a more robust discussion and management attention on native trout, watershed-based approaches to forest habitat management, and wildlife connectivity. Our recommendations are based on the following discussions.

Native Trout – Colorado River cutthroat trout

The GMUG is host to 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. But they have their challenges and this cutthroat species, unlike other subspecies, lacks both resilience and redundancy in their ability to adapt. Trout Unlimited has worked on CRCT issues consistently over many years, and we

¹ https://outdoorindustry.org/article/find-congressional-district-data/?utm_source=press+release&utm_campaign=GA+rec+economy+2018

² <https://cpw.state.co.us/Documents/About/Reports/StatewideFactSheet.pdf>

are excited to take advantage of this opportunity in the planning process to ensure even better protections for these fish and increased opportunities for habitat expansion.

Trout Unlimited recommends CRCT be a focus of the forest-wide planning language. We believe that a management opportunity to protect CRCT habitat would be to apply plan components throughout the forest rather than have a specific management area for CRCT. A landscape approach broadens the ability for maintaining long-term persistence of native cutthroat trout during times of rapid environmental change due to any number of factors but specifically in this forest, climate change, the spread of invasive species, and oil and gas development. A diverse portfolio that maximizes protections and restoration efforts helps improve genetic and geographic diversity. Trout Unlimited also believes that by implementing such a management portfolio the chances for adaptation increase as this forest changes. In addition, we believe this should reduce time-consuming efforts at managing species-specific areas and broaden the scope of the work, benefitting all species inhabiting this type of ecosystem.

Watersheds

As noted in the first bullet of the *Forest Plan Revision: Scoping* document, water resources are a huge part of the GMUG. Trout Unlimited's mission is to "protect, conserve, and restore coldwater fisheries and their *watersheds*," and we believe in a watershed-based approach to management as a means to ensure long-term diversity and stability for native trout populations. Native cutthroat trout require cold clean water and where you find native trout, you find excellent water quality. By effectively managing watersheds on the forest, other uses of our water resources and the forest landscape benefit. For many reasons, including the beneficial use of water resources, TU urges the GMUG to adapt a watershed-based planning approach to their management process.

The scoping document only identified Priority Watersheds as a Key Needs for Change under the *watersheds* heading. Trout Unlimited has been an advocate for designating Priority Watersheds for restoration, and would like to be considered partners in that effort going forward. Trout Unlimited also suggests additional considerations for administrative protections and facilitation of implementation projects through a watershed lens. Watersheds, by definition, house many different resource concerns and watershed health can mean many different things from many different perspectives and scales. We recommend the addition of a layered management framework specifically for watersheds. Complimenting plan components such as Priority Watersheds, Conservation Watershed Networks, and Riparian Management Zones would provide sufficiently flexible but prescriptive management tools for the life of the revised Forest Plan. Please refer to the "Management Area Framework" section of this document for additional comments on specifics of Conservation Watershed Network and Riparian Management Zones.

Wildlife Connectivity

Trout Unlimited appreciates the GMUG's desire to plan for more management direction in regard to wildlife. We specifically recommend noting and developing plan components, and/or management areas, that are specific to wildlife connectivity. As the management agency primarily responsible for wildlife habitat, the Forest Service has a unique opportunity to set precedence for other partner management agencies on which wildlife rely throughout their lifecycle. Aquatic connectivity is particularly important to Trout Unlimited and we have the follow specific recommendations for developing aquatic connectivity

language in the GMUG Forest Plan Revision:

Major Recommendations

- Use a combination of tools across the region and Gunnison Basin to ensure riparian and aquatic ecosystem connectivity and watershed health
- Layering of frameworks, management approaches, management or geographic areas, desired conditions, standards, and guidelines to create an Aquatic Conservation Strategy for the Gunnison Basin spanning the Gunnison, Uncompahgre, and Grand Mesa National Forests
- Utilize the existing Watershed Condition Framework as base to establish and execute metrics and water quality standards in the context of “geomorphic, hydrologic and biotic integrity” as defined in the Forest Service Manual
- Ensure that a monitoring plan includes useful monitoring questions around aquatic connectivity and ecological integrity
- Create a Conservation Watershed Network for Native Fish at the forest level but which is consistent across boundaries
- Create or expand the definition of Riparian Management Zones and apply a set of standards designed to assure riparian protection

We believe we have supplied additional information in addressing what needs to change in this plan revision to improve past management practices on the GMUG.

Management Area Framework

Trout Unlimited recognizes the importance of a variety of different designated management areas on a forest landscape. We support the use of geographic and management areas specifically in the GMUG plan revision, and TU suggests the GMUG pursue a variety of designations for waterways in these areas. Watershed restoration should be a focus in areas that receive significant impacts and demands. By strengthening waterways, less erosion, flooding, loss of water uses, and riparian degeneration will be reduced. By partnering with organizations and other agencies in restoration efforts, a broader range of creative and pragmatic actions can be maximized and reduce costs to the forest.

In addition, some designated areas should receive increased protections either administratively through the planning process, or in consideration with future permanent legislative actions. Specifically, TU supports the Gunnison Public Lands Initiative (GPLI³) and their recent scoping comments. TU remains fully committed to this Initiative and would consider the GMUG a valuable partner in this effort.

Backcountry Areas

Trout Unlimited supports the incorporation of Backcountry Areas as a formal management area as described in the scoping documents. We believe in the protection of a backcountry experience and the ecological values of the designation. Our recommendation is to advocate for management guidance beyond the singular inclusion of timber harvest restrictions in and near these designated Backcountry

³ <https://www.gunnisonpubliclands.org/>

Areas. Landscape impacts from other forms of development, such as oil and gas activities, can be equally detrimental, though timber harvest when done thoughtfully, restoratively, and in concert with the intent of a Backcountry Area, can improve the landscape.

Restoration Areas

Aside from a Priority Watershed designation, there are no restoration focused areas outlined in the scoping document. Trout Unlimited realizes that adapting to change will need to be a continued focus of the GMUG—changes such as climate impacts, political refocusing and financial limitations. For these reasons, TU suggests the designation of management areas allow for facilitated implementation focusing on ecological restoration. Coldwater fisheries and watersheds are our focus, and we believe that by implementing broad scale landscape discussions and adaptations in management actions, the benefits become more visible and tangible than through the focus of a few Priority Watersheds.

Conservation Watershed Network for Native Fish

A Conservation Watershed Network for Native Fish (CWN) is a model set forth in the Flathead National Forest’s Draft Revised Forest Plan⁴ in Montana as an approach to managing native fish habitat. 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.”

A September 2016 memorandum sent by the Washington Office to Regional Foresters⁵ clarified that the Forest Service has the authority under the 2012 Planning Rule to establish conservation watersheds in land management plans, and that the Forest Service has a long history of doing so.⁶ This authority complements the Forest Service’s requirement to identify priority watersheds generated through the Watershed Conservation Framework in land management plans.⁷ The memorandum also clarifies that the purpose of conservation watersheds is distinct from that of priority watersheds; the former is intended to be long-term designations designed to conserve aquatic species over the duration of a land management plan (i.e., decades), typically at a finer scale of watershed, while the latter is done more broadly, and can be “thought of as tactical and near-term designations guiding the implementation of agency work priorities in the near-term.”⁸ Priority watersheds identified through the Watershed Condition Framework are designated as priorities because of one or more conditions in a broad range of resource metrics, whereas conservation watersheds are designated specifically to protect or restore aquatic life.

⁴ http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd502201.pdf

⁵ See Memorandum dated September 30, 2016 entitled *Clarification on Conservation Watersheds in Land Management Plans* signed by Chris French and Rob Harper (Directors of Ecosystem Management Coordination and Watershed, Fish, Wildlife, Air and Rare Plants, respectively) to Regional Foresters.

⁶ For example, Northwest Forest Plans identify key watersheds, and Sierra Nevada Framework plans identify critical aquatic refuges.

⁷ 36 CFR 219.7(f)

⁸ *Ibid.*

We support such a CWN and when applied to the GMUG, development of a CWN should include:

- Watersheds currently in good condition or which have the potential to be restored to good condition
- Watersheds expected to protect native fish and help maintain healthy watersheds and river systems
- Watersheds resilient to impacts of climate change and thermal barriers
- Watersheds with existing, or potential for, high connectivity in Colorado River cutthroat trout habitat, genetics, and distinct populations
- Watersheds with high potential for storing water on the landscape in the form of floodplain and wetland connectivity
- Watersheds with existing or potential for connectivity between headwaters of congressionally designated protections with unprotected lower lying elevations
- Watersheds with geographic and hydrologic connectivity between pristine headwaters and lower stream reaches with poorer condition

In the creation of a CWN, many factors must be taken into consideration. The Flathead Forest Draft Forest Plan, Appendix E lays out a detailed description of their multiscale analysis and factors contributing to the designation of a CWN, but there are many examples under the umbrella term of Conservation Watersheds. In the Pacific Northwest, they are referred to as Key Watersheds in the Northwest Forest Plan, and Critical Aquatic Refuges in Region 5's Sierra Nevada Framework. There are currently no defined Conservation Watersheds in Regions 2 or 3. A locally sensitive CWN and a cohesive, landscape scale Aquatic Conservation Strategy would be the best management tool for the unique challenges of the regions aquatic and water resources.

Recommendations for considerations in creating a CWN for Native Fish in the Colorado River Basin include:

- A watershed-based analysis of varying scale, specifically for CRCT
 - Greater Colorado River Watershed
 - Gunnison River, Green River, Colorado CRCT populations
 - Larger Sub Basin complexes
 - Conservation Populations
 - Core Conservation Populations
- Close consultation of the 2006 Conservation Agreement for Colorado River Cutthroat Trout and of ongoing efforts in conservation biology and science from the strategies' partners
- A compilation, summarization and systematic analysis of available studies and data on existing trout habitat and population conditions, limiting factors, and climate change predictions relevant to the Colorado River Basin and its sub watersheds
 - Analysis of thermal connectivity, including possible climate change scenarios, applied to coldwater fisheries
- Degree of existing and potential connectivity
 - Ecologically
 - Hydraulically

- Hydrologically
- Culturally
- Politically
- Inventory of existing fish barriers or locations where fish barriers could feasibly be constructed, to prevent non-native fish species from colonizing or re-colonizing waters with native species.
- Other Native Fish species
- Watersheds important to other water users

Considerations for management of CWN watersheds:

- Removal of unnecessary physical stream and river barriers
- Optimization of existing infrastructure to facilitate natural stream function and fish passage
- Emphasis on green infrastructure instead of artificial constructions
- Prioritization of partner projects for restoration and rehabilitation
 - Such as the North Fork Escalante Creek partner project with TU
- Where appropriate recommend designations of recreational populations of CRCT
- Any timber activity need be consistent with the priority purpose of restoration and protection of Colorado River cutthroat trout
 - Proactively seek positive and mutually beneficial projects for forest health, timber extraction, and coldwater fisheries
 - Additional analysis process for any timber harvest permits to prioritize projects reducing risk of post fire flooding and meet strict standards to protect waterways from potential negative impacts
- Adhere to Forest Service BMPs protecting fish and their habitat
- No new extractive energy and mineral leases in conservation watersheds
- Strict water quality and riparian health standards, focused on health of CRCT, which are incorporated into the forest monitoring plan
- No net increase in roads
- Replacement of road-stream crossing structures that impede channel or floodplain as possible
- Decommissioning of unnecessary roads and stream-road crossings
- Application of BMPs for water including regular effectiveness monitoring
- Avoid stream channel disturbances during spawning season for Colorado River cutthroat trout, suckers, and chub
- Reevaluation of grazing allotments overlapping known CRCT populations and future project areas to encourage mutually beneficial riparian use for fish and permittee

Riparian Management Zones

Complementing the CWN, the Flathead National Forest Draft Revised Forest Plan also recognized additional classification of Riparian Management Zones (RMZ). These Zones would complement the CWN to provide the best possible management direction in aquatic connectivity and the 2012 forest

planning rule's direction to maintain and restore ecologic integrity of aquatic ecosystems and watersheds.⁹

From the Flathead National Forest Draft Revised Forest Plan, p 21-23,

“Riparian management zones are portions of watersheds where riparian-associated resources receive primary emphasis, and management activities are subject to specific standards and guidelines. RMZs include traditional riparian corridors, wetlands, intermittent streams, and other areas that help maintain the integrity of aquatic ecosystems by 1) influencing the delivery of coarse sediment, organic matter, and woody debris to streams, 2) providing root strength for channel stability, 3) shading the stream, and 4) protecting water quality. RMZ provide other riparian functions, including delivery of organic matter and woody debris, stream shading, and bank stability. Another critical function of RMZ is to provide for wildlife habitat use and connectivity.”

Recommendations for classification of RMZ

- Category 1 – Native Fish Bearing Streams
- Category 2 – Permanently flowing non-fish bearing streams
- Category 3 – Ponds, lakes, reservoirs
- Category 4 – Wetlands
- Category 5 – Seasonally flowing or intermittent streams or lands with exceptional detrimental erosion
- Distinction of management in “Inner” and “Outer” zones within the underlying RMZ

Considerations for management of RMZ

- RMZ reflect a natural composition of native flora and fauna and a distribution of physical, chemical, and biological conditions appropriate to natural disturbance regimes
- The species composition and structural diversity of native plant communities in riparian management zones, including wetlands, provide adequate summer and winter thermal regulation, nutrient filtering, appropriate rates of surface erosion, bank erosion, and channel migration
- They will supply amounts and distributions of nutrients, coarse woody debris, and fine particulate organic matter sufficient to sustain physical complexity and stability
- RMZ feature key riparian processes and conditions, including slope stability and associated vegetative root strength, wood delivery to streams and within the RMZs, input of leaf and organic matter to aquatic and terrestrial systems, solar shading, microclimate, and water quality, operating consistently with local disturbance regimes
- RMZs should have highly diverse structure and composition to support terrestrial riparian-associated plants and animals.
- Only activities that advance or do not threaten CRCT connectivity and aquatic ecological health allowed
- Prioritization of partner projects for restoration and rehabilitation including replacement of non-native vegetation such as tamarisk with appropriate native plantings

⁹ 36 CFR 219.8(a)(1)

- Preclude surface disturbance from oil and gas development within a buffer from the ordinary high-water mark from perennial and intermittent streams and other riparian areas; apply a larger setback from Gold Medal (CO).

Partnership

Trout Unlimited would like to be considered a with the GMUG in the Forest plan revision and in any potential on-the-ground implementation of forestry and watershed health related projects over the course of the final plan. Our extensive history and collective restoration and protection experience can be an asset as this plan moves into its final stages. 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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