



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

March 22, 2019

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

RE: Draft Wild and Scenic River Eligibility Evaluation

Dear Ms. Staley,

Please accept the following comments from Trout Unlimited (TU) on the Grand Mesa, Uncompahgre, and Gunnison National Forest's (GMUG) Draft Wild and Scenic River Eligibility Evaluation. 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 members and supporters 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.

Introduction

These comments reflect TU's collective staff and volunteer suggestions regarding the eligibility of stream segments on the GMUG for management consistent with wild and scenic eligibility protections. We appreciate the GMUG's inclusion of the 12 segments identified in the initial W&S eligibility evaluation. Specifically, we are strong supporters of the North Fork Escalante, Kelso Creek, West Elk Creek, and Cow Creek proposed eligibilities and associated protections.

We also see the value in casting a broader net for public participation in the eligibility evaluation. A recent example of public participation in the process can be seen at the Flathead National Forest. In this example, the community came forward with suggested W&S eligible segments, and at the end of the planning period, twice the originally recommended eligible stream miles were adopted in the final Forest Plan.

TU believes in the immediate management of W&S eligible segments so that future generations are able to judge the merits of Suitable and Congressional Designated Wild and Scenic river segments. Eligibility now comes with some very reasonable and adaptive-management based tools, and TU believes those guidelines are worthy of any waterway which is free flowing and possesses an ORV. We do not believe in shortsightedness when it pertains to our rivers, waterways, ORV's, and water resources. It is our belief that public participation in public land management is best achieved by having all the options laid out for collective vetting, rather than a truncated version of a typically robust process. Simply put, we believe in the possibility of future protections for rivers and streams, despite immediate political opposition to them, and we advocate against any political subjectivity in an objective process.

Fisheries

Cutthroat Trout

The GMUG is host to 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.

It is Trout Unlimited's assertion that all subspecies of cutthroat trout be included for consideration as an Outstandingly Remarkable Value (ORV). Based on the Regions of Comparison, there are very limited numbers of Colorado River cutthroat trout in all the compared geographies, save perhaps the Northern Central Highlands and Rocky Mountains, regardless of their lineage. Because of this fact, we argue that populations of Blue Lineage and Green Lineage native trout warrant recognition as Outstandingly Remarkable as compared to the rest of the region. Furthermore, when analyzing additional layers of uniqueness, such as subspecies and genetic purity, the value of the GMUG's native trout populations only become more outstanding and remarkable. Because of this observation, and the fact that only two populations have been currently established as eligible for a Fishery ORV, TU recommends a re-evaluation of all the native trout fisheries on the GMUG specially as applied to the regions of comparison.

In order of importance from lowest to highest, TU would rank our concerns related to our native trout fisheries as; Blue Lineage, Green Lineage, conservation populations, and core conservation populations. We strongly suggest that relying on a CPW brood stock segment for merit as an ORV be reconsidered and removed in the subsequent Plan Revision. Brood stock is a shortsighted and somewhat arbitrary metric, and it falls well outside of the Wild and Scenic Rivers Act's intent.

Below are examples from many nearby forests who all began their W&S eligibility evaluation with native fish populations that were not reflective of subspecies or even in some cases of genetic purity. Trout Unlimited encourages the GMUG to follow this precedent.

Rio Grande National Forest Draft Revised Land Management Plan¹ – “Fisheries: This is a Rio Grande Cutthroat stream with exceptional habitat”

Carson National Forest Wild and Scenic Eligibility Evaluation² - “Fish values may be judged on the relative merits of either fish populations or habitat, or a combination of these river-related conditions. Populations. The river is nationally or regionally an important producer of resident fish species. Diversity of native fish species or the presence of genetically pure Rio Grande cutthroat trout (RGCT) and absence of non-native hybridizing species.³ Habitat. The river provides uniquely diverse or high quality habitat for fish species indigenous to the region of comparison. Exemplary habitat for RGCT is of particular significance.”

Draft Santa Fe Wild and Scenic Eligibility Criteria³ - “Populations. The river is nationally or regionally an important producer of resident fish species. Diversity of fish species or the presence of conservation populations of Rio Grande Cutthroat Trout. (A species of conservation concern). Habitat. The river provides uniquely diverse or high quality habitat for fish species indigenous to the region of comparison. Exemplary habitat for Rio Grande Cutthroat Trout.”

Populations

Gold Medal fisheries should be considered an ORV. These are by CPW's definition the best of the best places in the state as defined by their robust fish populations (12 or more trout over 14" per acre and 60 pounds of standing stock per acre - the amount of living organisms in the ecosystem- including fish, plant life and micro invertebrates). In the evaluation of the Taylor River, the segment was removed as eligible because of the total river miles in Colorado which possess Gold Medal status. Trout Unlimited would like to point out that there are only 11 segments of river which qualify for this status in the state, regardless of mileage. Additionally, over 100 of those miles come from a single segment – the Arkansas River. We encourage the GMUG to review the Gold Medal fisheries on the Forest in relation to the corresponding Region of Comparison, and with the limited segment count in mind.

Habitat

In addition to the unique nature of a fisheries population, exceptional habitat can also be grounds for a segment's eligibility for W&S. Trout Unlimited would like to point out that although one reach has been

¹ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd560186.pdf

² https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd559306.pdf

³ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd533997.pdf

deemed particularly important from a population and habitat requirement, that no additional fisheries habitats were identified as Outstandingly Remarkable in the eligibility evaluation. In the face of future climate change scenarios, an influx of recreation and population growth, and long-term projected drought, there are some very unique trout fisheries on the GMUG. On one hand there are some incredibly unique and vulnerable desert settings that harbor coldwater fisheries, including some with native trout stocks, as well as some places that might come to be the future strongholds of conservation populations during the life of the GMUG's revised Forest Plan. Trout Unlimited would suggest additional segments be reconsidered through the lens of Outstandingly Remarkable fisheries habitat.

Recreation

In Colorado, hunters, anglers, and wildlife viewers had a \$5.1 billion economic impact in 2017 and of the state's total recreation-based economy, a staggering \$1.9 billion was generated from angling activities⁴. Residents of the 3rd Congressional district spend nearly \$2.2 billion on recreation per year⁵. According to the GMUG Draft Wild and Scenic River Eligibility Evaluation, a recreation ORV includes; "recreation opportunities that are, or have the potential to be, popular enough to attract visitors from throughout or beyond the State of Colorado," "Visitors are willing to travel long distances to use the river resources for recreational purposes," and "River-related opportunities including... fishing". Because of the obvious value of our recreational fisheries on the GMUG, Trout Unlimited suggests an additional layer of fishing based recreational segments be included in the eligibility evaluation and subsequent Revised Forest Plan.

Specific Segments

According to the above criteria, and additional merits identified by individuals and TU groups, several specific places on the GMUG have drawn our attention and we would like to propose for further examination of W&S eligibility. This is an incomplete list, one which TU would welcome consultation on if/when the eligibility framework is changed in future Draft Forest Plans. If the conditions recommended for evaluation in these comments were to be carried forward, some examples of segments which would be up for consideration include:

Horsefly Creek – the largest tributary to the lower San Miguel and home to a population of CRCT. In a geography where river protections, specifically W&S eligibility on the BLM, is being downgraded, Horsefly creek harbors a remote setting, wild characteristics, recreational value, and outstandingly remarkable attributes that should warrant eligibility.

Antelope Creek (West Elks) – CRCT populations exist, and the GPLI effort mirrors the protections recommended in this document.

Cochetopa Creek – The backcountry nature of this setting, the high elevation sagebrush large waterway, and the unique hydrology are merits worth considering in the wild and scenic eligibility conversation.

Taylor River – Gold Medal Fishery status and outstanding recreation warrant inclusion as wild and scenic eligible.

⁴ Colorado Parks and Wildlife 2017 Fact Sheet

⁵ Outdoor Industry Association 2017 Economic Impact Report

Cow Creek and Tributaries – The eligible segment should be extended downstream to the forest boundary. The ORV for biodiversity applies further downstream than the current extent indicates.

East, Middle and West Cimarron Creeks above Silver Jack Reservoir- These streams support wild trout including CRCT populations and provide unique scenic and wild qualities.

Conclusion

Overall, Trout Unlimited prides ourselves on pragmatic relationships with land managers that allow for win-win outcomes of protections, restoration, and reconnection of coldwater fisheries and their watersheds. In the case of the GMUG Wild and Scenic River Eligibility Evaluation we believe that the net for consideration as eligible has been cast far too small, and that the important voices of groups like ours have not been given sufficient leverage in the conversation. We hope that a wider definition of Outstandingly Remarkable Values, and the waterways they encompass in their W&S Eligibility be prioritized in upcoming Forest Plan Revision documents.

Sincerely,

A handwritten signature in black ink, appearing to read "Garrett Hanks". The signature is fluid and cursive, with the first name "Garrett" being more prominent than the last name "Hanks".

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