



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

July 28, 2019

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

RE: Working Draft of the Revised Land Management Plan

Dear Ms. Staley,

Please accept the following comments from Trout Unlimited (TU) on the Grand Mesa, Uncompahgre, and Gunnison National Forest's (GMUG) Working Draft of the Revised Land Management Plan. 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.

Major Considerations

The GMUG's Working Draft makes apparent the commitment to watersheds, watershed health, and the associated resource concerns. Trout Unlimited echoes the GMUG's commitment and thanks the Forest for incorporating Conservation Watershed Networks, Riparian Management Zones, and Wildlife Management areas into the Working Draft. We hope to continue to assist in the refinement of these and other concepts in subsequent drafts and final Land Management Plan.

While the inclusions listed above set the stage for healthy watershed and aquatic ecosystems, Trout Unlimited feels there is more work to be done to responsibly manage and protect the coldwater fisheries and their watersheds in the GMUG. Specifically, we would like to see more robust plan components related to native fish, especially Colorado River cutthroat trout, and fisheries in general. Additional Priority Watersheds should be established in the draft Land Management Plan, as well as additions made to the water resources plan components. Expansion of details associated with Conservation Watersheds and Riparian Management Zones are important additions we hope to see going forward. Trout Unlimited looks forward to working with GMUG planning staff to incorporate these changes into future drafts of the Forest Plan.

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 face numerous challenges, and this cutthroat species, unlike other subspecies, lacks resilience and redundancy, impairing their ability to adapt. Trout Unlimited has worked on CRCT issues consistently over many years, and we are excited to take advantage of our experiences and knowledge to assist in this planning process to ensure even better protections for these fish and increased opportunities for habitat expansion. We applaud and support efforts made to identify conservation population of CRCT and hope that the GMUG planning process supports enlarging CRCT habitat and extending protections to other valuable wild fisheries.

Our strong opinion is that CRCT merit the status of Species of Conservation Concern. If adopted under this designation, many of the following recommendations would be accomplished under that status. All lineages and genetic purities should be captured under this Species of Conservation Concern status. Because of the public's relationship with CRCT, and the legacy of the cutthroat trout on the GMUG, we feel that watersheds and waterways with different lineages and genetic purities would benefit from management direction specific to those species.

If the CRCT are not placed on the Species of Conservation Concern list, Trout Unlimited recommends CRCT be a focus of the forest-wide planning language. We believe that the management opportunity to protect CRCT habitat would be to apply plan components throughout the forest rather than housed generally under aquatic ecosystems and conservation watershed networks and they are now. More discussion on Conservation Watershed below, but the Forest Wide components concerning CRCT would cover a broad base of native fish issues, and the CWN would tackle the best-of-the-best locations.

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 species adaptation and resiliency 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.

Fisheries

Outside of the Conservation Watershed Networks, of which TU is a firm supporter, there are no mentions of fisheries, non-native desired game fish, or native trout species. We feel the best way to address these shortcomings is by adding plan components that are specific to fisheries and native fish. The Rio Grande National Forest's recently published Land Management Plan has a section of plan components specific to fisheries. We believe this can serve as a model for the GMUG.

Fishing is a cornerstone of recreation activity on the GMUG, in no small part because of the amount of quality coldwater fisheries, that significantly contributes to the recreation economy on the forest and the region. Fisheries are important in partnership on public lands and including the Forest. Like partnerships inclusive of these issues, the waterways of the GMUG connect resource concerns and geographies. Fisheries serve as indicators of landscape health, aquatic ecosystem and watershed health. Without specific management objectives and continued monitoring, the fisheries on the GMUG and all the roles they play, are in jeopardy.

The 2017 Rise to the Future: National Fish and Aquatic Strategy should serve as a roadmap for the GMUG's assessment of fisheries and how best to incorporate their management into the plan revision process. While we appreciate the GMUG's CWN finer scale of assessment for native fish, a high priority action identified in the National Strategy states, "Encourage development and updates of finer scale assessments of aquatic ecosystems on the national forests and grasslands that tier to regional assessments and contribute to forest plan revision and subsequent monitoring." Trout Unlimited would like to see this level of care to desirable wild and recreational fisheries. Included in the strategy is a section on partnerships. Trout Unlimited has participated in development of the National Fish and Aquatic Strategy, and we wish to continue that engagement locally on the GMUG.

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 place a heavy burden on the GMUG to maintain forest 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 working draft 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

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>

surrounding the forest. We recommend a stronger role be defined in the management components in the Draft Forest Plan.

Priority Watersheds

Trout Unlimited has long been a supporter, partner, and beneficiary of Priority Watershed designations. Some of TU's most successful long-term projects in the state have been initiated by Priority designations. In the most recent Farm Bill, partner organizations have been given the authority to write WRAP's. We feel as though the GMUG is missing a huge opportunity in choosing to only identify a single Priority Watershed in this planning process. Self-professed as one of the largest forests in the country, with one of the most varied landscapes, supporting some of the highest numbers of timber production and range base, hosting more water-related special uses than any other national forest, and providing the critical headwaters of the southwestern U.S. with water supply, it is simply not enough to designate one priority watershed. Trout Unlimited strongly urges the planning team to identify a minimum of 3 watersheds, one in each forest, and a maximum of 5, that is recommended under the 2012 planning rule. These watersheds are the lifeblood of communities of people and wildlife, and their restoration can have a legacy defining impact for those who choose to engage in their protection and enhancement.

We will point out that Priority Watersheds were a component of the Key Needs for Change, yet there are no changes proposed in this version of the plan. We refer to our scoping comments for details on how Priority Watersheds, Conservation Watershed Networks, and Riparian Management zones can work together for adaptive management and positive impacts to our public lands.

Ongoing management activities in Hubbard and Muddy Creek drainages has given reason for TU to believe that the Watershed Condition could be dramatically improved with some adequate assistance and would make that area a prime candidate for consideration as a Priority Watershed.

Specific Responses

Native species diversity

Native fish have no mention in the working draft outside of the Conservation Watershed Network. Included in the Native Species diversity section are big game and birds, yet no fish. We urge fish to be incorporated into future plan drafts.

Ecological Sustainability

Ecological sustainability covers a wide range of topics in TU's eyes. The GMUG working draft covers air quality but not water quality, and we propose that be remedied going forward.

Riparian Management Zones

In general, TU is very supportive of the GMUG's RMZ section. We support the objectives for improving miles and acreages, the guidelines for monitoring groundwater dependent systems, and the limitations on clearcutting in the RMZ. Trout Unlimited proposes some minor additions:

The GMUG has outlined only 1 classification for all moving waters. Although we feel this will generally suffice for the necessary protections to riparian areas, Trout Unlimited suggested multiple tiers of RMZ, including one for native fish, in our scoping comments which we still stand by and recommend.

FW-STND-RMZ-08 is a crucial standard, but many detrimental activities that are in direct opposition can, and do, happen immediately outside of the proposed width of an RMZ. Trout Unlimited would like to see the impacts from activities nearby an RMZ addressed.

FW-GDL-RMGD-10 Should include suction dredge mining in addition to the sediment inputting mining activities located outside an RMZ.

Aquatic ecosystems

Although TU fully supports many of the components of the Working Draft's Aquatic Ecosystems section, such as Standards 04 and 05, and Guideline 09, we have included some suggestions for improvements and additions.

Objectives are important metrics for accomplishing and monitoring impacts over the life of a Forest Plan. TU wishes to see objectives specific to the critical Aquatic Ecosystems of the GMUG.

TU stresses the need for thermal standards in the aquatic section. On a forest where there are both cold and warm water ecosystems, there should be a differentiation between them and corresponding plan components, including temperature standards.

Native Species Diversity

FW-DC-SPEC-01 should include aquatic language. It mentions "wildlife and fish" in the first sentence and should reiterate "wildlife and fish movement" in the second.

FW-GDL-SPEC-06 should mention the caveat of intentional barriers such as in the case of fish barriers for non-native fish. In a similar vein, new infrastructure shouldn't be limited to reducing impacts to habitat connectivity, it should also be given the opportunity to improve habitat connectivity.

Conservation Watershed Network

Trout Unlimited reiterates our support for the concept of a Conservation Watershed Network. The scale is appropriate, as is the focus on Green lineage CRCT. None the less, there is still little to no language specific to these fish. Trout Unlimited welcomes the ongoing partnership with the GMUG to best define how CWN's can work for land manager and partners into the future of the plan. Additional comments on CWN's and the Working Draft are below.

Referring to Table 5, we feel there are more watersheds which could be included for CWN designations. A list of specifics would be a welcome exercise which TU would be interested in facilitating between the GMUG and local partners. At a minimum, we ask for an addition in the Grand Mesa National Forest.

The lack of and standards to protect the most special watersheds of the most sensitive species is a concern, and plan component in general should be expanded. For example, a Desired Condition should be for the incorporation of additional Conservation Watersheds over the course of the plan.

Additional plan components for CWN's should include:

- Watersheds *expected* to protect native fish and help maintain healthy watersheds and river systems
- Watersheds resilient to impacts of climate change and thermal barriers as future refuges for target species

- 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

Objectives and Desired Conditions recommendations

- Incorporation 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
- Assess the 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.
- Where appropriate recommend designations of recreational populations of CRCT

Considerations for standards and guidelines in 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
- 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
- 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

Watersheds and Water Resources

In general, TU feels as though there is a very small amount of information in the Water Resources section, considering GMUG has the most water related special interest permits in the nation.

As stated above, Trout Unlimited believes that a productive Desired Condition should establish the desire for multiple priority watersheds to be designated and restored over the course of the plan.

Water resource projects should maximize water use efficiency.

Water diversion impacts should be minimized.

FW-OBJ-WTR-04 – needs a complimentary monitoring plan to achieve the 15% of subwatersheds metric.

Leasable Minerals

It is TU's strong assertion that leasable minerals not be allowed in RMZ's or CWN's, or Wildlife Areas.

Timber Harvest

FW-TBRR-STD-05 "Watershed conditions may be irreversibly damaged" should be better defined or referenced.

Management Area Direction

Wildlife Management Areas

TU wholeheartedly supports the Wildlife Management Areas, though would like to see more of them utilized in the Forest. Specifically, we recommend Hubbard Park for inclusion under this management area. Specifically, we support the standard for net gain in system routes.

One missing component to these areas is the need seasonal closures for big game and fish reproduction. This does not need to be a blanket provision, but the plan should establish and recommend these actions in specific locations and under specific conditions.

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 Working Draft Revised Land Management Plan. Trout Unlimited hopes to be a partner to Forest Service and other user groups in future land management on the GMUG National Forest.

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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