



November 8, 2019

NNMRAWR Project
Santa Fe National Forest
11 Forest Lane
Santa Fe, NM 87508
SM.FS.NNMRAWR@usda.gov

RE: Northern New Mexico Riparian, Aquatic and Wetland Restoration Project

Please accept the following comments on behalf of the New Mexico Council of Trout Unlimited (TUNM) regarding the Northern New Mexico Riparian, Aquatic and Wetland Restoration Project. We represent over 1200 Trout Unlimited members in New Mexico.

TUNM thanks the Santa Fe, Carson and Cibola National Forests for recognizing the importance of watershed restoration given the climate change impacts already being observed in our state's watersheds and need to reduce the impediments such as the costs and time required to complete the NEPA process. We understand that these comments will be received after the November 4 deadline, but we were overwhelmed by also reviewing the Carson and Santa Fe Forest Plans within the same timeframe. At the scoping meeting in Santa Fe last month, we were assured that our comments would still be considered and we appreciate that offer and hope it still applies.

Overall, TUNM agrees with the purpose and need of this project. We concur that project will result in a more efficient process that will accelerate implementation of projects that would aid in the restoration of the target habitats, the recovery of riparian and aquatic species located on the forest, watershed health, and water quality. The types of projects outlined in the Activities and Design Criteria document will create resilient conditions within stream channels and in riparian zones.

TUNM also would like the Forests to consider the following comments we have on the Restoration Categories and Descriptions document:

Trout Unlimited New Mexico Council, P.O. Box 32952, Santa Fe, NM 87594

p. 2, *Streambank Restoration*: This paragraph should also include those streambanks that are heavily incised/eroded or otherwise not hydraulically connected to their associated streams.

p. 2, *Riparian Vegetation Planting*: This paragraph should also include areas disturbed by catastrophic events such as wildfires and heavy flooding.

p. 3, *Aquatic Organism Passage Projects*: Third paragraph should include use of small, controlled explosives where heavy construction equipment cannot be used. This might be necessary for projects in Wilderness Areas.

p.4, *Fish Passage Barriers*: The design criteria should include methods for augmentation of natural barriers. Natural barriers, e.g., waterfalls lacking sufficient height or gradient, can be modified with equipment or, in Wilderness Areas, explosives to create barriers that meet other basic design criteria.

p. 12, *Instream, Side-Channel, and Floodplain Projects*: The design criteria for these projects should include timing the project work to minimize impacts on wildlife breeding or hibernating, fish spawning, etc., especially for species of concern.

p. 12, *Stabilize Headcuts*: Include using methods that spread water across meadows rather than leave it in the channel below a headcut. This would be primarily used where the headcut is in a meadow somewhat removed from the stream and would help prevent dewatering of the meadow.

p. 16, *Fencing, Stream Crossings, Pasture Improvements ...* : Include projects to construct fencing to prevent or discourage livestock from creating or using trails that contribute to development of erosion channels.

p. 18, *Beaver Habitat Restoration, In-Channel Structures*: Last paragraph should add “or planted with such vegetation” after “trees”

p. 20, *Revegetation*: Add this additional bullet, “Where an existing channel has been diverted from a natural channel by being ‘captured’ by livestock or recreational trails, roads or other anthropogenic causes, the water course shall be returned to the relic channel by plugging the unnatural channel to divert water to recreate a natural flow.”

In conclusion, while TUNM believes this project will help streamline riparian restoration, there are other impediments that can slow some of the projects down considerably. A key one is Clean Water Act (CWA) permitting. The Forests should also be plotting a parallel course of working with the Army Corps of Engineers and the New Mexico Surface Water Bureau to streamline the CWA permitting process for riparian projects.

TUNM appreciates the opportunity to comment on this project, and we look forward to being able to participate constructively as this project moves forward.

Sincerely,

Art Vollmer
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