



Sent via email to: SM.FS.NNMRAWR@usda.gov

June 1, 2020

Josh Hall
Natural Resource Staff Officer
Santa Fe National Forest
Attn: Northern New Mexico Riparian, Aquatic and Wetland Restoration Project
11 Forest Lane
Santa Fe, NM 87508

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

Dear Mr. Hall,

Please accept the following comments from Trout Unlimited (TU) on the Northern New Mexico Riparian, Aquatic and Wetland Restoration Project. 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.

With regards to the Northern New Mexico Riparian, Aquatic and Wetland Restoration Project Draft Environmental Assessment we are **strongly supportive of Alternative B, the proposed action**. We greatly appreciate the Forest Service's commitment to the riparian and aquatic resources of the region, as well as the commitment to partnerships in the process of creating this document. It is our belief that through this action, years of impactful work will be achieved to make northern New Mexico resilient and adaptive to the future changes we will undoubtedly experience in the project lifetime. We also note that this type of programmatic work will leverage additional resources in the form of partnerships and collaborative process.

We want to highlight the components of the Proposed Action that provide measured levels of flexibility and adaptive management, ensure due diligence where necessary, and merge with other important

planning processes like Forest Plan revisions. We believe this will be a model for addressing multiple resources across the Carson and Santa Fe National Forests and the Kiowa National Grasslands.

Below are some additional comments from Trout Unlimited. These comments are not intended to distract from our support of Alternative B, however are included for consideration if appendices or components of the project specifics are modified or clarified in the future.

General Comments

Flexibility

TU hopes to see this project utilized to greatly increase the pace and scale of riparian and aquatic restoration across a large landscape. Because of this, we hope for maximum flexibility and adaptive management within projects. As mentioned in the Proposed Action, the waterways of this region have an inordinately large impact on the entire landscape. This landscape is also forecasted to see incredible changes in the coming years. Climate, drought, precipitation patterns, recreation, and population are all factors which will impact, and be impacted by, the National Forest's management of the riparian and aquatic resources. Because so many unknowns remain regarding these changes, flexibility and a large tool kit will be the best preparation managers and partners have to best adapt to the coming changes. We applaud the Forest Service in their attempt to allow for flexibility, but in some ways, as commented below, we would hope to see even greater ability for adaptive management covered in this Proposed Action rather than the need for additional future NEPA actions.

Flows and timing

Wording that precludes work outside of low flow times in rivers and wetlands seems overly cautious, especially given that in certain situations high flow is easier, less impactful, and more feasible for contractors to operate. In general, we support any guidelines to minimize or eliminate potential negative impacts from active management, so agree with the sentiment the Forest is seeking by adding low flow provisions. However, consider the case of low flow in a Rio Grande cutthroat trout (RGCT) stream, when temperatures are stressful to fish and refuge habitat is limited. A restoration project undertaken during that time may do more harm than good to the improvement of the target resource. Flexibility in implementation, certainly in timing, should be considered.

Fish Passage Barriers

Trout Unlimited would like to see more flexibility where fish passage barriers are concerned. While we certainly understand what is at risk when large scale barriers are truly needed, and fully support the intense specifications and engineering necessary to achieve the lowest risk possible, these large structures are too expensive demanding for all applications. In some cases, the ability to act quickly and cost effectively when called upon are extremely valuable. Fires, climate change, predatory fish outbreaks are all times when a simple and less permanent barrier would prove invaluable to a population of native fish. The recent 416 fire on the San Juan National Forest is one example of an instance that could require an alternative to a traditional concrete fish barrier. In that case, a population of San Juan cutthroat trout was put at risk by the post-fire's flows connecting to downstream habitat occupied by non-native trout. Rather

than go through the rigorous engineering to build a structure that withstands major floods, many examples of more simple and temporary barriers could be utilized. The Forest Service has used “backcountry barriers” effectively elsewhere, comprised mostly of wood from on or near site. Increasingly available electronic barriers are also becoming recognized as highly effective tools. So, in the spirit of a flexible toolkit, we hope that fish barriers will become more accessible and widespread, and tailored to different specifications in different stream types and for different fish species.

Specific Comments

- Trout Unlimited’s comments are indicated by the bullets below.

Aquatic Organism Passage Projects

- Consider the positive benefits that culverts can provide as nonnative fish barriers

Erosion Control Structures, Headcut and Grade Stabilization

- Reduce *negative* sedimentation and erosion
 - Not all erosion or sedimentation is bad. In some cases, we wish to promote sedimentation to best heal downstream impacts
- Source and use native and natural materials first, only bringing in nonnative and manmade materials where necessary
- Stabilize headcuts and excessive erosion
 - Not all erosion problems come in the form of headcuts

Streambank Restoration

- Remove *artificially*.
 - Altered streambanks, no matter the cause should be eligible for restoration under this program. Consider a post fire flood’s impacts for an example of a natural process that still may benefit from restoration

Legacy Structure Removal

- Include Riprap

Channel Reconstruction/ Relocation

- ...reconnect and restore relic side channels or *create new ones*

Fish passage barriers

- Generally, *but not always*, created of concrete

Streambank Restoration

- Bank toe

- Sometimes a bank toe's position and location should be changed to benefit the site. More flexibility would be better suited to the type of restoration this document promotes

We once again thank the Forest Service for their effort in crafting an important and valuable document in the Northern New Mexico Riparian, Aquatic and Wetland Restoration Project Draft Environmental Assessment, and we once again reiterate our strong support of adopting Alternative B going forward.

Sincerely,



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