Data Submitted (UTC 11): 7/29/2019 6:00:00 AM
First name: Hattie
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Organization: American Whitewater
Title:
Comments: GMUG Working Draft Feedback - American Whitewater

Dear Brittany,

American Whitewater is submitting comments on the GMUG's Working Draft of the Revised Land Management Plan. American Whitewater endorsed and collaborated on the Outdoor Alliance GMUG Vision (OGV) document which captures what human-powered recreational users see as a successful outcome of a new Forest Plan. The comments attached here are in direct response to the Working Draft dated June 2019. The comments are attached to this e-mail. Please don't hesitate to reach out with any questions you may have regarding our comments.

Best regards,

--

Hattie Johnson, PLA

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Join American Whitewater!

Re: Working Draft of the Revised Land Management Plan for the Grand Mesa Uncompahgre and Gunnison National Forests

American Whitewater appreciates the opportunity to submit comments on the Forest Service's Working Draft management plan for the Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG).

About American Whitewater

American Whitewater is a national 501(c)(3) non-profit organization with a mission "to conserve and restore our nation's whitewater resources and enhance opportunities to enjoy them safely." With over 6,000 individual and 100 affiliate club members, American Whitewater represents the interests of over 80,000 river enthusiasts. As conservation-minded whitewater recreationists, we place a high value on protecting naturally functioning river ecosystems, including their fish and wildlife, geomorphic processes, and potential to provide clean and safe

drinking water. Our membership and the general public highly value our nation's river systems and associated riparian zones, and we have a direct interest in maintaining healthy rivers for everyone to enjoy.

Introduction

The Grand Mesa, Uncompahgre, and Gunnison National Forests are home to some of Colorado's most prized rivers and creeks. These waterways attract our members from across the region and the country, and we support management actions that protect and preserve healthy watershed systems and provide unique recreational opportunities. American Whitewater has continued to participate throughout the GMUG Plan Revision process, including submitting comments on the Draft Wilderness Evaluation, the Draft Wild and Scenic Eligibility Evaluation, and through participation in numerous GMUG planning webinars and communicating directly with the Forest Planners. American Whitewater has also been a participating member in the Outdoor Alliance GMUG Vision for the GMUG National Forests. The feedback provided here are in direct response to the Working Draft of the Revised Land Management Plan for the GMUG and serve to complement the broader OA Proposal.

The GMUG's rivers and creeks provide numerous recreation opportunities for a variety of skill levels and crafts, including rafts, kayaks, canoes, and stand up paddle boards. Human-powered recreation, including paddling, contributes significant amounts to the local economy1 and attracts visitors to the GMUG from around the country. However, many watersheds in the GMUG are threatened by dams, transmountain diversions, mining operations, and other forms of water pollution2 3. In many areas, access to rivers and creeks for recreation needs to be improved and additional infrastructure in certain places is needed to improve the quality of recreational opportunities. Enhanced and more strategic management of these areas is needed, as recreation has increased and changed in character since the 1983 GMUG Forest Plan. This should be achieved through updated overall management direction and new specific place-based designations where appropriate.

American Whitewater's comments on the Working Draft prioritize healthy watersheds and recreational access to waterways that support human-powered paddling opportunities. Below, we provide general feedback on the Working Draft, as well as specific comments that are organized chronologically according to the Working Draft. The plan component numbering system is referenced where necessary.

General Comments

- There are numerous areas indicated in the Working Draft map where proposed management area boundaries are inconsistent with important waterways. Creeks and rivers often flow in and out of management boundaries (e.g., Daisy Creek in Poverty Gulch). Boundaries should be consistent with waterways and the desired conditions of the proposed designation should align with the existing and potential uses of the river corridor. Management area boundaries should consider prioritizing access to river corridors and trails, while limiting development where

necessary to maintain desired primitive conditions.

- The Forest Plan should meet more than just the minimum requirements for assessment and plan components. For example, only one priority watershed was identified across all three forests, while there are over 970 identifiable river and stream segments in the GMUG. Adequate analysis of every watershed should be completed to determine a

1https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/5bff483303ce647407356fc1/1543456828876/OA_GMUG

NF_SharePiece.pdf

2 Bembenek, A. (2013). Upper Slate River Watershed Plan. Retrieved from Coal Creek Watershed Coalition: http://www.coalcreek.org/documents-and-data.html

3 Stantec Consulting. (2005). Coal Creek Watershed Protection Plan. Retrieved from Coal Creek Watershed Coalition: http://www.coalcreek.org/documents-and-data.html

complete list of priority watersheds. Similarly, less than 5% of the GMUG is being analyzed for or determined to be included under specific Management Area direction (e.g., Wilderness to be Analyzed, High-Use Recreation Area, etc.).

Specific Comments

Forest Plan Vision, Roles, and Contributions

- All types of human-powered paddling should be recognized. On Page 8, the Working Draft references rafting and kayaking as popular recreation activities. While this is unquestionably true, plan direction should acknowledge all types of boating, including rafting, kayaking, canoeing, and stand up paddle boarding. Paddle boarding has become vastly more popular in the last decade and it's important to recognize that different river segments support different types of paddling (Pg. 8).

- Where the economic impact of recreation is mentioned in the Working Draft, Outdoor Alliance's economic impact of human-powered recreation report4 should be referenced. Human-powered recreation, including rock climbing, mountain biking, hiking, paddling, and snow sports, contributes $392 million annually to the GMUG area (Pg. 9).

Partnerships and Coordination

- Partnerships and coordination with a variety of entities, NGOs, and individuals is critical to successful management in National Forests. Local organizations and their members are authentically connected to the land and waters and have unique expertise to contribute.

For example, American Whitewater's National Whitewater Inventory5 is a robust inventory of paddling opportunities throughout the nation, including the GMUG, and should be used as a resource in Forest Service planning. (Pg. 10, FW-DC-PART-01)

Riparian Management Zones and Groundwater-Dependent Ecosystems

- FW-GDL-RMGD-09: American Whitewater agrees that clear-cut harvest should not occur in riparian management zones and the Forest Service should consider prohibiting any form of timber harvesting that could negatively impact the riparian area and river corridor. (Pg 19, FW-GDL-RMGD-09).

- FW-GDL-RMGD-11: In addition to ensuring minimal impact to riparian management zones, new water diversions and impoundments on recreational reaches should ensure stream connectivity and safe passage for paddling (e.g., boat chutes on low head dams

4https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/5bff483303ce647407356fc1/1543

456828876/OA_GMUGNF_SharePiece.pdf

5 https://www.americanwhitewater.org/content/River/state-summary/state/CO/

and proper signage warning of dangerous diversion structures). (Pg. 19, FW-GDL- RMGD-11).

Aquatic Ecosystems

- A robust river recreation economy in the GMUG depends, in part, on healthy aquatic ecosystems and American Whitewater supports actions that protect and improve aquatic ecosystems and associated factors including water quality and water quantity.

- FW-STND-AQTC-05: Where possible, the Forest Service and other stakeholders should coordinate with

recreation users to provide flows that can support both the environment and recreation. On segments where there are river recreation opportunities, it is critical that both environmental and recreational values are supported simultaneously and that multi-purpose projects that support aquatic ecosystems and recreation are prioritized. (Pg. 20, FW-STND-AQTC-05).

- FW-GDL-AQTC-07: American Whitewater supports a critical decision-making process when determining when to remove large wood from streams. There are several considerations to be assessed when removing large woody debris for recreational safety. The ecological benefits of large woody debris need to be weighed against the threat posed to recreationists.6

Watersheds and Water Resources

- FW-DC-WTR-02: Change to read "... to provide critical water supplies to communities and water users and maintain healthy watersheds for the environment and recreation." Non-consumptive water uses rely just as heavily as consumptive uses on healthy watersheds. (Pg. 34, FW-DC-WTR-02).

- Watershed restoration projects should not conflict with boating access and use, and where necessary, specific trails and parking lots should be established to reduce environmental impact while preserving recreational access. (Pg. 35)

Lands and Special Uses

- Throughout the GMUG National Forests there exist complex property boundaries between the USFS, BLM, and private property owners. These property boundaries often exist in or near the river corridor and trail systems, complicating access to rivers and trails in some areas. Where these boundaries intersect with both water-based and land- based recreation opportunities, the Forest Service should work closely with the BLM and with private property owners to preserve and improve access to sustainable recreation, while respecting private property rights and existing grazing rights. (Pg. 43 & OA Vision Policy Recommendations).

6 https://www.americanwhitewater.org/content/Wiki/stewardship:woody_debris

- FW-GDL-LSU-05: Change to read "... Improves access for recreationists including hunting, fishing, paddling, and trail users." Access to paddling opportunities on Public Lands is a priority for many residents and visitors to the GMUG and river access trails and roadways should be preserved and enhanced where possible. (Pg. 43, FW-GDL- LSU-05)

Recreation

- There should be an additional "objective" to improve access areas to river recreation where necessary (Pg. 46).

- Management standards for recreation should include measures to prevent ecological impact. This could include providing concentrated infrastructure that encourages sustainable recreation practices. Protection of ecological conditions is vitally important to recreation users. Standards should emphasize balance between recreation use and ecological impacts. (Pg. 47)

- FW-GDL-REC-09: Trails that provide access to rivers for paddling purposes should be allowed where necessary, foot traffic should be encouraged to use primary trails instead of dispersed unofficial trails. These primary trails should be properly maintained so people are more inclined to use them. (Pg. 48, FW-GDL-REC-09).

Scenery

- FW-OBJ-SCNY-02: Projects to remove unnecessary fencing that conflict with recreational trail and river access should be prioritized under this objective. (Pg. 51, FW- OBJ-SCNY-02)

Timber

- FW-STND-TMBR-05: AW reiterates the importance of prohibiting timber harvest in areas where watershed conditions may be irreversibly damaged or even significantly damaged for a prolonged period. In areas within the suitable timber base, river recreational experiences should be integrated, protected, and restored (Pg. 53, FW-STND-TMBR-05)

Eligible Wild and Scenic Rivers

- American Whitewater, in collaboration with Outdoor Alliance and the Telluride Mountain Club, submitted a robust comment letter on the Forest Service's Wild and Scenic Eligibility Evaluation Draft on March 21, 2019. While the Forest Service continues to review public comments and prepare the Final Eligibility Evaluation, we ask that our comments are given due consideration and that our recommended additions to the Eligibility Evaluation are included. (Pg. 55)

- American Whitewater agrees with the guidance outlined on Working Draft page 2 that states "(If any) Recommendations to Congress for lands[hellip] and the identification of rivers eligible for inclusion in the National Wild and Scenic River System[hellip] ". The 2012 Planning Rule does not require or encourage a Suitability Study to be completed as part of the Forest Planning process and we ask the Forest Service to focus solely on producing a robust Eligibility Inventory. (Pg. 2)

Wilderness

- Canoeing, kayaking and rafting are likely the oldest forms of travel and exploration aside from walking. Though technological advances have improved safety (as in all outdoor recreation) the core elements of the activity remain; exploring natural areas by paddling a small boat through the landscape on rivers. Each river is a natural trail through the landscape, reflecting the character of the geology and natural beauty. Paddling is human-powered, place-based, low-impact, quiet, non-consumptive, skill-based, and Wilderness- compliant; it is exactly the kind of activity and experience covered under the definition of "sustainable recreation" in the new Forest Planning Rule.7 As such, paddling opportunities in the GMUG Forests should be given proper recognition and management measures should be taken to adequately protect these opportunities now and for future generations. (Pg. 59 & OA Vision Policy section)

Special Areas and Designations

- MA-DC-SIA-01: Where Special Interest Areas are established that overlap with paddling opportunities, paddling should be identified as a use allowed and supported within the Special Interest Area (e.g., East River in the proposed Gunnison Research SIA). As mentioned above, paddling is considered a form of "sustainable recreation" and is low impact. Paddling can be compatible with scientific research and monitoring, other types of recreation, and many other uses that are managed through Special Interest Areas. (Pg. 60, MA-DC-SIA-01)

Recreation Emphasis Management Areas

- The proposed High-Use Recreation Areas encompass multiple river segments that have high-quality paddling opportunities in the Gunnison National Forest, including Daisy Creek, Slate River, and the Taylor River above and below Taylor Park Reservoir.

Proposed management of High-Use Recreation Areas should stay consistent with existing and/or desired conditions for paddling.

- MA-GDL-HIREC-03: In many areas (e.g, Slate River, Daisy Creek, Upper Taylor River, etc.) parking opportunities for river access points need to be improved, rather than further restricted. This should be taken into consideration when implementing

7 FSH 1909.12, zero code, section 05

management controls. Official parking areas and access trails where needed will both improve the recreational experience and reduce negative environmental impact. Many access locations within the river corridor provide a semi-primitive experience enjoyed by many visitors. Where it does not detract from the recreational experience these locations development should be minimal. Improved high-use river access points will encourage concentration of users there and better prevent impacts on semi-primitive locations. (Pg 64, MA-GDL-HIREC-03, OA Vision Gunnison NF Place-Based Designations)

- River corridors are essential to on-water river recreation, such as paddling; however, they provide valuable

experiences to a wide range of visitors. Concentrated and varied use areas within river corridors should be provided to offer a range of experiences and to ensure impacts outside of developed access points can be maintained.

Appendix 7: Priority Watersheds

- American Whitewater reiterates the need for a robust assessment of plan components, especially Priority Watersheds.

- Restoration projects identified for Priority Watershed Oh Be Joyful Creek should be evaluated as to their impacts on recreational paddling opportunities. Integrating recreational goals and safety into projects can foster public support for projects, encourage recreational use and stewardship, and reduce the likelihood of avoidable accidents8.

Thank you for considering our comments on the GMUG's Working Draft of the Revised Land Management Plan. Please reach out to us with any questions on the comments we have provided here.

Sincerely,

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Colorado Stewardship Assistant American Whitewater

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8 Colburn, Kevin. "Integrating Recreational Boating Considerations into Stream Channel Modification and Design Projects." www.americanwhitewater.org, 11 Mar. 2012, www.americanwhitewater.org/content/Document/view/documentid/1006/.

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