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Comments: On behalf of Trout Unlimited, please find the attached comment letter pertaining to the Lincoln National Forest's draft management plan. Thank you.
Dear Lincoln Forest Planning Team,Please accept the following comments from Trout Unlimited (TU) on the Draft Land Management Plan (draft plan) for the Lincoln National Forest (LNF). We offer these comments as part of our continued effort to influence the LNF[rsquo]s future management direction to benefit native fish and wildlife, watersheds, and water resources and to advocate for the interests of sportsmen and women who engage in outdoor recreation activities on LNF[rsquo]s 1.2-million-acre landscape.Trout Unlimited is the nation[rsquo]s oldest and largest coldwater fish conservation organization. TU has approximately 300,000 members and supporters who are actively engaged in our work nationwide including 1,400 members in New Mexico. Our mission is to conserve, protect, and restore North America[rsquo]s coldwater fisheries and the watersheds upon which they rely. Our volunteer members actively utilize and enjoy the streams, lakes and watersheds located on LNF lands, including fishing, hunting, and wildlife viewing opportunities. Within the close vicinity of the LNF, we have four TU chapters (Bosque, Truchas, Enchanted Circle, and Gila/Rio Grande) whose members fish, recreate and contribute to on-the-ground restoration efforts within this forest.Our emphasis continues to center on the importance of watersheds and water resources found in the plan area and the provisional ecosystem services they provide. We agree with the planning team[rsquo]s assertion of the need for large-scale habitat improvements and restoration for the LNF[rsquo]s watersheds, many of which are impaired or functioning at-risk. Many of our comments address the importance of riparian and stream habitat, as well as fisheries on the LNF, with an emphasis on Rio Grande cutthroat trout (RGCT) habitat and opportunities to expand RGCT to additional waters on the forest. We enthusiastically support the LNF[rsquo]s objective, as identified in the draft plan, to establish a Rio Grande cutthroat trout reintroduction and management zone into the upper reaches of the Rio Bonito Watershed, and we hope you will consider us a partner in this effort.The majority of our comments are specific to forest plan components [ndash] objectives, standards, and guidelines [ndash] for sections of the plan pertaining to Riparian Areas, Water Resources, Aquatic Species and Habitat, and Roads. Our staff have engaged in forest planning processes throughout New Mexico and across the west in recent years. Many of our suggestions come directly from those forest plans, notably the Carson and Santa Fe National Forests[rsquo] final management plans, which we believe offer many good examples for restoration-based objectives and other plan components that will help the LNF achieve its desired conditions and result in tangible improvements to streams, riparian areas, and aquatic species.Despite many challenges, we believe the LNF can produce resilient, sustainable, and highly functioning streams, riparian areas and watersheds that provide for healthy fish and wildlife populations, diverse recreational pursuits, and numerous traditional uses. And we recognize this can only be achieved with clear management direction, sufficient resources, and a collaborative approach. While our footprint in the Lincoln landscape is smaller than elsewhere in New Mexico, we look forward to partnering with you on future projects across the forest.The Sportsmen[rsquo]s Vision for the LNFIn addition to Trout Unlimited[rsquo] s focus on watersheds and water resources, we continue to advocate for the interests of sportsmen and women in the LNF[rsquo]s forest plan revision process. Angling and hunting are important uses of national forest lands and are dependent on high quality waters, outstanding habitat conditions, wildlife corridors, healthy watersheds, and appropriate access. The focus on habitat and biological needs of fish and wildlife species is certainly needed and an important component of a well-developed Forest Plan, however we believe it is also necessary to acknowledge the importance of these resources from the standpoint of those hunters, anglers, and members of the public who actively use the forest.Trout Unlimited realizes that complexity in management designations can be challenging for Forest Service managers to implement. However, we feel that within the new planning framework there are multiple scenarios where layered management directions would be a benefit when it comes to the management of fish and wildlife habitat and recreational uses.Below are four primary considerations, offered in our previous comments, that we believe should be concentrated on from a landscape and watershed perspective as you move toward completion of the final management plan:1. Improve

watershed health throughout the LNF with an emphasis on protecting and restoring streams, riparian areas, and wildlife habitat.2. Ensure riparian areas are protected and restored by clearly delineating riparian management zones for perennial, intermittent, and ephemeral water bodies and developing forest plan components to move these areas to a healthier, functioning condition over the life of the plan.3. Restore native Rio Grande cutthroat trout (RGCT) habitat and populations and improve recreational angling opportunities.4. Manage for responsible OHV use, limit the impacts of roads and non-designated routes on streams and wildlife habitat, and protect roadless areas important to wildlife and forest users.Improving Watershed Health: A Native Fish ApproachTrout Unlimited supports the notion that managing forest resources to benefit native trout results in largescale improvements to watershed health. TU has been involved in numerous restoration projects in New Mexico that improved riparian habitat, stream function, groundwater recharge, and water quality improvements with a primary emphasis on improving conditions for native RGCT and Gila trout. Through the actions of restoring native trout habitat, coldwater fisheries in general end up benefitting. We recommend the LNF continue to approach the planning process through the lens of native fish and aquatic species, especially in those sub-watersheds where native fish are found or historically persisted.Draft Forest Plan CommentsRecommendations for Riparian AreasThe Final Assessment, Need for Change, and Draft Plan all acknowledge the high value of riparian ecosystems to overall forest health, and we have advocated previously that restoration and protection of these areas be a driving force in the future management direction on the LNF. Riparian ecosystems can have a disproportionate influence on overall ecosystem sustainability and a threat to the sustainability of the riparian ecosystem is a threat to the sustainability of the ecological structure of the Lincoln NF as a whole (preliminary plan, page 50).We commend the planning team on the inclusion of excellent desired conditions for riparian areas, as well as many standards and guidelines that should help protect riparian habitat, improve water quality, and benefit species. We are concerned, however, with the great deal of latitude given to delineating riparian management zones (RMZs) and we believe it is imperative that RMZs include intermittent and ephemeral streams, as these are scientifically shown to serve many of the same ecosystem functions as perennial waters. Desired conditions are great, but must be accompanied by strong standards, guidelines, and objectives to ensure desired conditions are achieved.We recommend the following suggestions for improving the final management plan:1. Specify a numeric target to track progress toward achieving Objective 1 (FW-RIPAR-O1). Currently, there is no such target (see note below). We previously recommended the following example from the Carson National Forest[rsquo]s final management plan, which could be modified for the LNF: [ldquo]Restore structure and function of at least 200 -300 acres of nonfunctioning and functioning-at-risk riparian areas annually[rdquo]. In addition to a clear numeric target, please specify, as proposed in the Gila National Forest[rsquo]s draft plan (pg. 92) that riparian restoration projects that count toward this objective must include more than just noxious and invasive weed treatments (those projects should be counted under a different objective).Note: The Draft EIS, Volume 1 (pg. 31) states that Alternative B would [ldquo]Improve a minimum of 12 miles of riparian areas considered to be functioning at risk or non-functioning over a ten-year period[rdquo]. However, this language doesn[rsquo]t seem to correspond with the objective in the draft plan. Further, we suggest the LNF reevaluates using stream miles as a metric for restoring riparian acres. Mileage may be a more appropriate measurement for restoring streams and aquatic habitat, and acreage may be more appropriate for riparian habitat. Importantly, the final plan should include restoration objectives for both streams/aquatic habitat and riparian areas.2. Explain in more detail how the LNF will delineate riparian management zones (RMZ[rsquo]s). We believe the current guideline (FW-RIPAR-G 1) is insufficient, relying too heavily on a site-specific analysis and failing to provide guidance specific to perennial, intermittent, and ephemeral streams. We recommend the planning team consider a guideline similar to the Santa Fe National Forest[rsquo]s final management plan (pg. 79) that allows for site-specific delineations but also provides guidance on RMZs in the absence of such: [ldquo]Riparian management zones (RMZ) should be defined to include either a site-appropriate delineation of the riparian area or a buffer of 100 feet from the edges (e.g., each stream bank at bankfull or edge of the water body) of all perennial and intermittent streams, lakes, seeps, springs, and other wetlands or 15 feet from the edges of the ephemeral channels. The waterbody itself is considered part of the RMZ. The exact width of RMZs may vary based on ecological or geomorphic factors or by waterbody type, but includes those areas that provide riparian and aquatic ecosystem functions and connectivity.[rdquo]3. Add a guideline related to grazing and herbivory in riparian areas. We suggest the following guideline from the Santa Fe National Forest[rsquo]s final management plan (pg. 79):

[ldquo]Herbivory of riparian plants should not cause long-term trends away from desired riparian conditions.[rdquo] The draft plan includes 13 guidelines for Riparian Areas, yet fails to directly address one of the primary factors impacting the health of riparian habitat [ndash] grazing and herbivory. The final plan should not shy away from acknowledging the direct connection between grazing/herbivory and the condition of riparian areas.4. Add a guideline specific to construction of roads. The draft plan[rsquo]s guidelines for riparian areas address motor vehicle usage, but not roads themselves which are a major driver of habitat and water quality impairments. We recommend the following from the Gila National Forest[rsquo]s draft plan (pg. 93), which could be included as a guideline in both the riparian and road sections of the Lincoln plan: [ldquo]New construction or realignment of roads and motorized routes, recreation sites or other infrastructure should not be located within the 100-year floodplain or within 300 feet of an RMZ. Exceptions for stream crossings are made where determined necessary by site-specific analysis to reduce potential long-term investments in maintenance or adverse impacts (a downward trend or movement away from desired conditions) to floodplains and water resource features.[rdquo]New Recommendations for Water Resources:1. Include an objective related to road impacts in this section of the plan, similar to the Santa Fe National Forest[rsquo]s final management plan (pg. 72): [ldquo]Over 10 years, improve watershed function by decommissioning or mitigating impacts (e.g., maintenance, improvements, or reroutes) on at least 100 miles of route (e.g., system roads, unauthorized routes, and trails) to the point of restoring hydrologic and ecological function[rdquo]. Emphasis should be placed on restoring hydrologic function, and this objective could be shared with the roads section.2. The LNF should improve Objective 1 (FW-WATER-O1) for water resources by specifying the timeline for achieving watershed improvements as measured by the Watershed Condition Framework. The LNF does not know how long this forest management plan will be in place. Based on historic precedent it could be 30 years or more. The final plan should specify the duration over which this objective is to be achieved, measured in years (e.g., ten years, fifteen years).3. Add a restoration objective to the plan specific to treating incised stream channels and upland erosion issues. As we stated in our previous comments, the LNF[rsquo]s Ecological Assessment acknowledges there are many opportunities to treat and restore incised channels and headcutting, restore or maintain floodplain connectivity, and increase water storage and infiltration. [ldquo]Along much of the upper part of the Rio Penasco, the stream channel is only slightly incised in relation to the new floodplain. There are numerous headcuts along this section of stream[hellip]Most headcuts along the Upper Rio Penasco and Wills Canyon are small, being only 1-2 feet high[rdquo] (Final Assessment, Volume 1, page 227). We recommend an objective such as the following to help achieve desired conditions for water resources and soil health: [ldquo]Annually install 50 to 100 erosion control treatments to stabilize headcuts, road drainage impacts, and other erosional features[rdquo].4. Add a plan component(s) specific to surface waters designated as Outstanding National Resource Waters by the state of New Mexico. The criteria for ONRW designations in New Mexico are set forth in the Water Quality Standards in Section 20.6.4.9.B of the New Mexico Administrative Code. These waters are subject to the same water quality criteria as other waters with the same designated uses, but receive a higher degree of protection from human activities that could negatively alter their water quality status. The final management plan should include plan direction for preventing and reversing impairments for this special class of waters. We recommend including a guideline specific to surface waters with this designation, but at a minimum a management approach should be developed specific to preventing and addressing impairments to these waters in collaboration with the New Mexico Environment Department.5. In our preliminary draft plan comments, we noted that a desired condition pertaining to self-sustaining populations of native fish and quality habitat to support these populations should be included as a desired condition. We once again ask that such a desired condition is included in the plan. While there are serious challenges facing wild and native trout on the LNF, we believe it[rsquo]s important and achievable to manage for self-sustaining trout and other aquatic species. Such a desired condition is essential for guiding management decisions to ensure the persistence of at-risk species on the forest, to recover threatened and endangered species, and to prevent future listings that constrain future management options. We suggest the following for inclusion in the final plan: [ldquo]Aquatic and riparian habitats support self-sustaining populations of native fish, as well as other aquatic and riparian species, and provide the quantity and quality of aquatic and riparian habitat within reference conditions (Carson draft plan, page 65)[rdquo].6. We previously asked the LNF to include a desired condition specific to the quantity and timing of stream flows, such as: [ldquo]The quantity and timing of stream flows are sustained at levels that maintain or enhance essential ecological functions, including

channel and floodplain morphology, groundwater recharge, water quality, and stream temperature regulation.[rdquo] Such a desired condition should be included for either Water Resources or Aquatic Species and Habitat since stream flows are critical to healthy aquatic systems.New Recommendations for Fish, Wildlife, and Plants - Aquatic Species and HabitatWe appreciate the LNF[rsquo]s intent to addresses species viability and persistence in the forest plan by providing guidance to maintain and enhance fish and wildlife habitat. We support many of the plan components for both terrestrial and aquatic species included in the draft plan, and offer the following suggestions for plan improvement.First, we highly recommend the inclusion of the following enhanced restoration objectives for fish and wildlife habitat from Alternative D in the final plan. As identified in the DEIS, Vol. 1 (pg. 41), these include the following:[bull] Reduce nonnative fish in native fish populations in at least six stream reaches during each 10-year period following plan approval[bull] Complete at least eight projects to improve habitat connectivity for aquatic and riparian species[mdash] for example, removing barriers, relocating and decommissioning roads, restoring dewatered stream segments, connecting fragmented habitat, and providing wildlife passage friendly fences[mdash]during the 10-year period following plan approval[bull] Restore or protect 10 miles of aquatic habitat over a 10-year period following plan approval[bull] Restore or enhance at least 40 acres of wetlands over 10-yearsWe would, of course, also support Alternative D[rsquo]s objective to [ldquo]Improve the WCF score for at least six watersheds over the life of the plan[rdquo]. However, we are unsure as to the feasibility of this. If it is an attainable goal, it should absolutely be included in the final management plan. In all of its restoration objectives, the LNF should establish ambitious targets and establish new and innovative strategies and partnerships to achieve them.We also recommend the following changes or additions for the final management plan:1. Increase the numeric target in Objective 1 (FW-AQSPH-O 1) beyond 5 miles (as noted above). We also recommend the LNF make this objective recurring (every ten years), not just the first ten years of the plan, and provide examples of the types of projects that may qualify. The Santa Fe National Forest final plan includes the following two objectives: [ldquo]Complete aquatic restoration on priority projects that restore 30 miles of aquatic habitat (e.g., increase pool quantity, provide stream cover, remove or install fish barriers, restore beaver populations, or treat invasive aquatic species) every 10 years to benefit aquatic species[rdquo] and [ldquo]Implementing 15 miles of stream restoration every 10 years[rdquo] (pg. 78).2. Concerning objective (FW-AQSPH-O4), our recommendation is also to increase the numeric target and make it a recurring goal. The LNF should set an objective of completing a minimum number of habitat connectivity projects for aquatic species in every ten-year period following plan approval, not just the first ten years.3. We are highly supportive of efforts to re-establish and expand populations of native trout. Please consider us a partner in achieving the objective to [ldquo]establish a Rio Grande cutthroat trout reintroduction and management zone into the upper reaches of the Rio Bonito Watershed[rdquo], and include the objective in the final plan. We hope to see this work begin in the early years of the new forest plan and we can help bring resources to the table to make it happen.Importantly, we would also like to note that validated tools for removal of non-native trout such as piscicide (rotenone) application and the construction of in-stream barriers are critical for successful reintroduction of native RGCT, and that a [ldquo]next-generation[rdquo] of fisheries management tools that are under development may be applicable for the LNF, including use of YY-male Brook trout, and electronic fish passage barriers. We encourage the planning teams to incorporate these management tools into plan components for aquatic species in the final plan.New Recommendations for RoadsThe Ecological Assessment acknowledges that roads can negatively impact water resources, including riparian and aquatic systems (page 279), as well as species dependent on those systems. The preliminary plan acknowledged that [ldquo]many unauthorized routes exist that are not part of the Lincoln NF transportation system, but the Lincoln NF has not done an inventory and compilation of this data[rdquo] (page 89).Our primary concern with roads on the LNF is their impact to fish and wildlife, aquatic and riparian habitat, and water quality. In order to address these impacts, it is necessary to assess where they are occurring and to what extent. Given the impacts of existing roads on forest resources, and the need to address degradation caused by already existing system and non-system roads, it is important that new sources of degradation from roads are not permitted on the forest.We offer the following recommendations for improving the Roads section in the final plan:1. Add a desired condition such as the following: [ldquo]The location and extent of non-system roads is known, as are impacts from non-system roads on forest resources such water quality, habitat, and native species.[rdquo]2. Given existing road densities on the forest and the degradation caused to other resources, we suggest a guideline for mitigating impacts from new road

construction, such as: [ldquo]Construction of new system roads should be accompanied by a mitigating action (e.g., decommissioning) of other unneeded roads and routes to offset any resource damage resulting from their construction.[rdquo]3. We are supportive of Alternative D[rsquo]s plan components to prioritize protection of riparian areas when decommissioning roads, which would reduce the impacts of roads compared with all the other alternatives (DEIS, Vol. 1, pg. 62).4. Concerning Objective 2 (FW-ROADS-O2) - decommission 75 miles of road within 15 years [ndash] we support this objective being included in the final plan. However, we suggest additional language or plan components to indicate that in order for roads to count toward this objective they must be decommissioned in a manner that prevents illegal use. In some cases, this may require obliterating or naturalizing road segments, and it will certainly require monitoring to ensure illegal use is not occurring. The Carson National Forest[rsquo]s final management plan (pg. 116) includes an objective to [ldquo]obliterate or naturalize at least 20 miles of unneeded roads within each 10-year period following plan approval.[rdquo] Such an objective could complement a road decommissioning objective.5. Add an additional objective in the final plan to ensure the LNF implements projects that reduce road impacts to streams, water quality, and aquatic species in the earlier years of the plan: [ldquo]Implement at least five projects to improve stream crossings where chronic sedimentation or other resource degradation is known to occur.[rdquo]Recommended Wilderness AreasTrout Unlimited supports all of the recommended wilderness areas identified in the draft plan[rsquo]s preferred alternative (Alternative B) totaling 40,500 acres and request these areas are included in the final plan.Concerning wilderness evaluation, we encourage you to evaluate how well potential recommended wilderness units and other management alternatives would contribute to a more robust wildlands network that contributes to wildlife movement, landscape permeability, and related aspects of climate adaptation in addition to the 3 criteria you applied (DEIS, Vol. 1, pg. 32). Further, we believe that limiting wilderness recommendations to those areas with [ldquo]a location in or next to designated wilderness areas, which improves the management of those areas[rdquo] is erroneous. Any areas found to have high or very high wilderness characteristics but were excluded based primarily on their proximity to existing wilderness, should be reevaluated for inclusion in the final plan.Concerning Inventoried Roadless Areas (IRAs) we recommend an approach that aims to improve conditions on the numerous IRAs while protecting their primitive and roadless character, with consideration of identifying IRAs that may be worthy of wilderness designation. This may help distribute the heavy use on the Wilderness Areas by outfitters and guides and distribute use to other use to other equally high-value areas.Eligible Wild and Scenic RiversThe draft plan proposes 54 stream segments totaling 141 stream miles for Wild and Scenic eligibility, all of which should be retained in the final management plan.Wild and Scenic River designation allows for the construction of fish barriers to protect native trout populations. Structures that preserve free-flowing character and recreational uses while aiding in the recovery of native fish should be allowed on streams managed for WSR eligibility, and we encourage the LNF to include a plan component that acknowledges that fish barriers to aid in native trout recovery are allowed on eligible streams.ConclusionWe appreciate the opportunity to comment on the draft land management plan for the Lincoln National Forest. We would be happy to follow up with members of the planning team regarding any of our comments and suggestions.