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Comments: Please accept the attached comments on behalf of Trout Unlimited. Feel free to contact me via phone or email with any questions or concerns. Thank You!

Please accept the following comments from Trout Unlimited (TU) on the Grand Mesa, Uncompahgre, and Gunnison National Forest's (GMUG) Draft Revised Land Management Plan. We appreciate the Forest Service's invitation to participate in the planning process and your willingness to work 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 for coldwater fisheries, wildlife and drinking water. 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 12,000 members statewide actively participate in projects with the National Forest, local agencies, and private landowners to maintain the larger forest landscape that is so vital to the social and economic standing of the surrounding 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, the 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 most recent DRLMP makes apparent the commitment to watersheds, watershed health and associated resource concerns. The planning area contains an estimated 3,657 miles of perennial streams and rivers, and 1,390 miles of intermittent streams that provide biologically, economically and recreationally important native and sport fisheries. Trout Unlimited echoes the GMUG's commitment and thanks the Forest for incorporating Conservation Watershed Networks (CWN), Riparian Management Zones (RMZ), and Wildlife Management Areas (WMA) into the Draft. We hope to continue to assist in the refinement of these and other concepts as the Forest Service progresses toward the GMUG's Final Forest Plan.

Beyond aquatic-specific issues, we understand that active forest management is important to address the increasing risk of catastrophic wildfire, improve habitat conditions for wildlife and manage for forest health and resilience in the face of climate change. We believe that the designation of WMAs and the associated plan components in Alternative B will provide the flexibility for the USFS to implement this important work while maintaining habitat connectivity and increasing conservation of the most important wildlife habitats across the forest. We also support those portions of Alternative D advocated by the local community in the Gunnison Basin that are consistent with management direction for WMAs and additional fish and wildlife habitat protections provided in Alternative B, including proposed mineral withdrawals in Special Management Areas and Recommended Wilderness Areas that overlap with those WMAs.

While the inclusions listed above also 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 Final EIS and Proposed 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, along with select expansions of river segments deemed eligible for Wild and Scenic river designation.

Trout Unlimited recognizes the efforts by GMUG planning staff to address our previous comments and looks forward to working with GMUG planning staff to incorporate these changes into the Final Forest Plan.

Native Trout [ndash] Colorado River cutthroat trout

The GMUG is host to a large portion of currently occupied habitat for a truly unique and native fish [ndash] 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 populations 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[rsquo]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 is found in applying plan components throughout the Forest, rather than housed generally under aquatic ecosystems and conservation watershed networks as they are now. More discussion on Conservation Watershed Networks 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 is little mention of fisheries, non-native desired game fish, or native trout species. We feel the best way to address this shortcoming

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 and some of those components can still be adopted prior to publishing the Proposed Plan.

Fishing is a cornerstone of recreation activity on the GMUG, in no small part because of the amount of quality coldwater fisheries, and it significantly contributes to the recreation economy on the Forest and throughout the region. Fisheries are important in partnership on public lands, including the GMUG, where waterways 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 USDA's 2017 publication, [Idquo]Rise to the Future: National Fish and Aquatic Strategy,[rdquo] 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, [Idquo]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.[rdquo] Trout Unlimited would like to see this level of care for desirable wild and recreational fisheries incorporated into the Final Forest Plan. 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 outdoors. In Colorado's 3rd Congressional District, outdoor recreationists spent approximately \$4 billion. A similar report released by Colorado Parks and Wildlife indicated a statewide economic contribution from angling at \$1.9 billion, with an additional \$920 million from hunting. This results in an overall \$2.8 billion contribution just from angling and hunting sports [ndash] 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.

As the top economic contributor to the GMUG, 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, healthy terrestrial habitat for hunting, these activities could be jeopardized. The importance of the outdoor recreation industry is growing and will continue to be a major contributor to forest use and neighboring communities surrounding the forest. Recreation's role in the management components of the Forest Plan cannot be understated.

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. Recognized 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. water supply, it is simply not enough to designate one Priority Watershed.

Trout Unlimited strongly urges the planning team to identify a minimum of three watersheds, one on each Forest, and a maximum of five, as is recommended under the 2012 planning rule. These watersheds are the lifeblood of communities of both 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 the most recent 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 in conjunction for adaptive management making positive impacts on our public lands.

Pointedly, ongoing management activities in Hubbard and Muddy Creek drainages on Thompson Divide have given reason for TU to believe that the Watershed Condition could be dramatically improved with some adequate assistance, making that area a prime candidate for consideration as a Priority Watershed.

The Hubbard Creek tributaries above the Overland Canal contain CRCT conservation populations, but below the canal the creeks have been dewatered and the once healthy fisheries are struggling. Similarly, diversions have impacted the fishery and CRCT population on Clear Fork of Muddy Creek, northeast of Hubbard. A little bit of effort will go a long way toward restoring those streams.

Specific Responses

Riparian Management Zones

In general, TU is very supportive of the GMUG's RMZ section. We support the objectives for improving miles and acreage, the guidelines for monitoring groundwater dependent systems, and the limitations on clearcutting in the RMZ.

However, we propose some minor additions:

[bull] The GMUG has outlined only one 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 in our scoping comments, including one for native fish, which we still stand by and recommend.

In collaboration with our partners at Colorado Parks and Wildlife (CPW) and other engaged sporting conservation groups (TRCP, BHA, CWF, NWTf), we also recommend the following modification:

[bull] Modification to FW-OBJ-RMGD-06: The suggested 10-year objective of 2,500 acres of riparian or

meadow habitat amounts to only 250 acres per year, and the 10-year stream objective of 15 miles equates to just 1.5 miles per year. While we recognize the staffing and funding constraints of the Forest Service, we believe there is an urgent need to increase the rate of restoration and enhancement of these habitats. We recommend that the Objective for riparian zones be 200-foot total width listed in linear miles with an annual objective of 15 miles per year, and that a separate Objective be included for riparian-related meadow acres. In addition, we recommend that the 10-year stream Objective be at least 10 miles per year for restoration of hydrologic function.

Aquatic Ecosystems

TU fully supports many of the components of the Aquatic Ecosystems section and recognizes the improvements and additions from the previous Working Draft. Objectives are important metrics for accomplishing and monitoring impacts over the life of a Forest Plan and TU appreciates the addition of objectives specific to the critical Aquatic Ecosystems of the GMUG.

However, we continue to stress 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.

Additional recommendations and modifications to the Plan are as follows:

[bull] New forestwide Objective to identify areas critical for the maintenance and expansion of non-native recreational fisheries. FW-OBJ-AQTC-03 recognizes the need to conserve and expand native aquatic and semi-aquatic species. Please incorporate an additional Objective that reflects the importance of identifying, maintaining, and expanding non-native recreational fisheries and the economic benefits they provide to local communities and the State of Colorado.

[bull] Modification to FW-STND-AQTC-05 (Recommended changes underlined in italics): [ldquo]New, replacement, and reconstructed crossings (culverts, bridges, and other stream crossings) and in-stream structures (impoundments, diversions, and weirs) on perennial streams and on intermittent streams known to be used by native fishes (bluehead sucker and flannelmouth sucker) for spawning, will accommodate flood flows and allow aquatic organism passage, unless the accommodation would increase non-native species encroachment on native fish and amphibian habitat. Exceptions include temporary structures in place for less than one year. See also the Forestwide guideline for connectivity, SPEC-06.

[bull] Modification to FW-GDL-AQTC-07(Recommended additions underlined in italics): [ldquo]To maintain stream channel stability and aquatic habitat, large wood should not be cut and/or removed from stream channels. Projects adjacent to streams, especially trails, should follow the guidance of FW-GDL-RMGD-15. Exception: wood threatens critical infrastructure and/or public and recreational boater safety (e.g., mid-channel bridge piers).[rdquo]

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. Nonetheless, there is still little to no language specific to these fish.

The Forest Service, working with its multiple partners on the Colorado River, has already identified key watersheds outside of Wilderness Areas that are best suited for native trout restoration and should be able to easily identify where watershed plans are needed to address threats such as degraded habitat, excessive recreational use, etc. While we recognize the staffing and funding constraints of the Forest Service, we recommend modifying FW-OBJ-SPEC-54 by increasing the goal for this Objective to completing three watershed plans within 5 years of plan approval and setting implementation goals and a timeline for addressing major threats to target species within each plan. Please also reference FW-OBJ-RMGD-06.

Trout Unlimited welcomes the ongoing partnership with the GMUG to best define how CWN[rsquo]s can work for the land manager and partners as the Forest Plan is implemented. Additional comments on CWN[rsquo]s as they apply to the revised Draft are below:

[bull] Referring to Table 7, we feel there are more watersheds that could be included for CWN designations. A list of specifics would be a welcome exercise that 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.

[bull] The relative lack of standards to protect the most special watersheds of the most sensitive species remains a concern, and plan components in general should be expanded. For example, a Desired Condition should be the incorporation of additional Conservation Watersheds over the course of the Plan.

Additional Plan components for CWN[rsquo]s should include:

[bull] Watersheds expected to protect native fish and help maintain healthy watersheds and river systems.

[bull] Watersheds resilient to impacts of climate change and thermal barriers as future refuges for target species.

[bull] Watersheds with existing, or potential for, high connectivity in Colorado River cutthroat trout habitat, genetics, and distinct populations.

[bull] Watersheds with high potential for storing water on the landscape in the form of floodplain and wetland connectivity.

[bull] Watersheds with existing or potential for connectivity between headwaters of congressionally designated protections with unprotected lower lying elevations.

[bull] Watersheds with geographic and hydrologic connectivity between pristine headwaters and lower stream reaches with poorer condition.

Objectives and Desired Conditions recommendations:

[bull] Incorporation of the 2006 [ldquo]Conservation Agreement for Colorado River Cutthroat Trout[rdquo] and ongoing efforts in conservation biology and science from the strategy[rsquo]s partners.

[bull] 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.

- o Analysis of thermal connectivity, including possible climate change scenarios, applied to coldwater fisheries.

- [bull] Assess the degree of existing and potential connectivity

- o Ecologically

- o Hydraulically

- o Hydrologically

- o Culturally

- o Politically

- [bull] 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.

- [bull] Where appropriate, recommend designations of recreational populations of CRCT.

Considerations for standards and guidelines in CWN watersheds:

- [bull] Removal of unnecessary physical stream and river barriers.

- [bull] Optimization of existing infrastructure to facilitate natural stream function and fish passage.

- [bull] Emphasis on green infrastructure instead of artificial constructions.

- [bull] Prioritization of partner projects for restoration and rehabilitation.

- o Such as the North Fork Escalante Creek partner project with TU.

- [bull] Any timber activity need be consistent with the priority purpose of restoration and protection of Colorado River cutthroat trout.

- o Proactively seek positive and mutually beneficial projects for forest health, timber extraction, and coldwater fisheries.

- o 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.

- [bull] No new extractive energy and mineral leases in conservation watersheds.
- [bull] Strict water quality and riparian health standards, focused on health of CRCT, which are incorporated into the forest monitoring plan.
- [bull] No net increase in roads.
- [bull] Replacement of road-stream crossing structures that impede channel or floodplain as possible.
- [bull] Decommissioning of unnecessary roads and stream-road crossings.
- [bull] Application of BMPs for water including regular effectiveness monitoring.
- [bull] Avoid stream channel disturbances during spawning season for Colorado River cutthroat trout, suckers, and chub.
- [bull] Reevaluation of grazing allotments overlapping known CRCT populations and future project areas to encourage mutually beneficial riparian use for fish and permittee.

Additionally, we would request modification to FW-STND-SPEC-55 by expanding this standard to apply to all sub-watersheds. Due to aquatic species and water quality concerns, ground-based equipment should not be used in sub-watershed perennial streams or their riparian management zones unless used for stream or riparian zone habitat restoration or improvement.

Watersheds and Water Resources

While we recognize and appreciate efforts to expand Management Approaches, considering GMUG has the most water related special interest permits in the nation, TU maintains that a productive Desired Condition should establish the aspiration for multiple Priority Watersheds to be designated and restored over the course of the plan.

Given that the life of the Forest Plan is likely to exceed 20 years, and that improving watershed conditions is critical to increasing the resilience of the forest in the face of climate change, we would also like to see FW-OBJ-WTR-04 modified to reflect a goal higher than 15 percent. We suggest aiming to improve conditions for at least 30 percent of sub-watersheds over the life of the Plan. At this pace, sub-watershed conditions would potentially be improved across the entire forest in ~70 years (versus ~140 years). In addition, we recommend creating a priority list of sub-watersheds that need to be restored or enhanced with an implementation schedule for restoration or enhancement that is reviewed annually.

Leasable Minerals

It is TU's strong assertion that leasable minerals are not allowed in RMZs, CWNs or WMAs.

Management Area Direction

Wildlife Management Areas

TU wholeheartedly supports the Wildlife Management Areas, though would like to see more of them established on the Forest. Specifically, we recommend Hubbard Park for inclusion under this management area. Specifically, we support the standard for no net gain in system routes (MA-STND-WLDF-02).

One component missing from these areas is the need for 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.

We would also like to see a new Forest-wide Objective to annually review CPW's post-hunt big game population estimates and herd management plans in order to identify adaptive management needs necessary to provide sustainable harvest that meets or exceeds average big game harvest success rates across Colorado.

New WMA Recommendations for Specific High Value CRAs identified in Alternative B

Most Wildlife WMAs included in Alternative B overlap some designated CRAs and would be managed under the applicable Forest-wide direction as well as the combined plan components for both Management Area types. However, analysis from the Theodore Roosevelt Conservation Partnership and Backcountry Hunters and Anglers in their recently published Wild Lands and Wildlife Report demonstrates that some CRAs currently have motorized and/or mountain bike trails or designated snowmobile routes within their boundaries to the extent that additional trail/route development within them would jeopardize their value as wildlife habitat and their roadless character. These areas also hold conservation populations of Colorado River cutthroat trout and any additional habitat impacts concern us.

Without the additional plan components for CRAs, there is no guarantee that these areas will retain their roadless character or achieve the Desired Conditions for wildlife. Due to their high value for native fish and wildlife, we recommend that the following CRAs receive overlapping WMA designation:

[bull] Cimarron Ridge. This Roadless Area comprises a large part of the Cimarron-Big Blue WMA recommended by CPW and BHA and should also be designated as a WMA to maintain its Roadless character and wildlife habitat values. Cimarron Ridge provides elk summer range, summer concentration areas and production areas, as well as winter range on the lower west side. It also provides summer and winter range for mule deer. Conservation populations of CRCT can be found in Fall Creek along with resident populations of native cutthroat trout in Big Blue Creek as well as the East, Middle and West Forks of the Cimarron River. Travel on the limited number of existing trails is seasonally restricted from late September through early July to mitigate impacts to elk, and to provide opportunities for quality backcountry hunting and fishing.

[bull] Cimarron-Big Blue WMA. Most of the area within the Cimarron-Big Blue WMA recommended by CPW and BHA is designated as a combination of WMA and/or Roadless within Alternative B of the DRLMP. One major exception is the entire area on the west side of the Cimarron Ridge Roadless area from Nate Creek to Deer Creek which is designated as General Forest. This section of the Forest provides high quality summer range and summer concentration areas for elk, as well as several production areas. In addition to holding a conservation CRCT population, Nate Creek and Deer Creek provide a significant elk security area and help reduce conflicts with elk use on the adjacent private lands. There are also critical migration routes between summer habitat on National Forest lands and adjacent winter range on public and private lands.

The Nate Creek trail bisects the area and provides a seasonal single-track motorized route from the Owl Creek Road to Silverjack Reservoir, which then connects to the Alpine Trail over to the Alpine Plateau. Under the current Uncompahgre Forest travel management plan, this trail system is only open to motorcycles from early July through the end of August. This limitation is to mitigate impacts to elk calving and fall security, while also providing an area for backcountry hunting opportunities beginning with the archery season and extending through the rifle seasons.

The wildlife resources and hunting opportunities within this portion of the Cimarron-Big Blue WMA are exceptional. Any further trail development or increased recreational uses should be managed consistent with the

additional direction provided by WMA designation to avoid impacting wildlife resources and related recreational uses.

[bull] Horsefly WMA. Thank you for including the Horsefly WMA in Alternative B of the Draft Forest Plan. This portion of the Uncompahgre Plateau provides significant habitat for big game, native trout and other wildlife species. The lands within and adjacent to this WMA have also been the focus of a collaborative effort between the GMUG, BLM and CPW to improve habitat for big game and alleviate conflicts with elk use on the adjacent private lands.

The Dead Horse area southwest of Sanborn Park is an essential component of this WMA, and was unfortunately not included within the boundaries of the Horsefly WMA in Alternative B. Habitat conditions resulting from the 1990 Horsefly wildfire and subsequent mechanical and prescribed burning projects on BLM and Forest lands in the Dead Horse area in combination with a seasonal closure of the local road system have created a significant winter concentration area for elk in this portion of the Uncompahgre Plateau. TU seconds the recommendations of our colleagues at TRCP and BHA to include the Dead Horse area within the Horsefly WMA to continue these management efforts at the landscape level necessary to sustain habitat connectivity and our wildlife resources. Additionally, TU recommends consideration of Horsefly Creek for Wild and Scenic River eligibility.

Wild and Scenic River Eligibility Evaluation

The Western Slope of Colorado is the source of some of the nation's wildest, most picturesque and coveted recreational rivers, streams and fisheries, but not a single mile designated as Wild and Scenic. Trout Unlimited appreciates and fully supports the inclusion of 118 eligible stream miles in the GMUG's Draft Evaluation, including four segments [ndash] Fall Creek, Muddy Creek, Anthracite Creek, and Copper Lake and tributaries [ndash] that were added to the current draft since the initial 2019 Draft Evaluation.

However, TU believes there are several additional rivers within the GMUG that meet the criteria of being free-flowing and containing one or more [ldquo]outstandingly remarkable value[rdquo] (ORV) required for Wild and Scenic eligibility. The eligibility phase of the Wild and Scenic Rivers Act is deliberately designed to be the most broad in scope, offering interim protection for these valuable resources by extending opportunity for consideration to every river segment that is both free-flowing and containing one or more ORV. What's more, we believe there is ample room for the Forest Service to broaden its interpretation of both the [ldquo]fish[rdquo] and [ldquo]recreation[rdquo] ORVs to recognize the rare and sometimes unique attributes of western Colorado's rivers that attract visitors from around the globe.

Fish

It is Trout Unlimited's assertion that all subspecies of cutthroat trout be included for consideration as an Outstandingly Remarkable Value (ORV). Based on the Regions of Comparison [ndash] both old and new [ndash] used for analysis of potentially eligible rivers, there are very limited numbers of Colorado River cutthroat trout in almost all the compared geographies, regardless of their lineage. Because of this fact, we argue that populations of Blue Lineage and Green Lineage native trout warrant recognition as Outstandingly Remarkable as compared to the rest of the region, and certainly within the pared-down region of Colorado.

Furthermore, when analyzing additional layers of uniqueness, such as subspecies and genetic purity, the value of the GMUG's native trout populations only become more outstanding and remarkable. Because of this observation, and the fact that only a few populations have been established as eligible for a Fishery ORV, TU recommends inclusion of additional native trout fisheries on the GMUG specially as applied to the regions of comparison.

Populations

Gold Medal fisheries should be considered an ORV. These are by CPW's definition the best of the best places in the state as defined by their robust fish populations (12 or more trout over 14" per acre and 60 pounds of standing stock per acre). Trout Unlimited would like to point out that there are only 11 segments of river which qualify for this status in the entire state, and more than a third of the state's Gold Medal waters are found on a contiguous length of the Arkansas River. We encourage the GMUG to review the fisheries on the Forest qualifying as Gold Medal – specifically the Taylor River – in relation to the corresponding Region of Comparison, and with the limited segment count in mind.

Habitat

In addition to the unique nature of a fishery's population, exceptional habitat can also be grounds for a segment's eligibility for W&S. In the face of future climate change scenarios, an influx of recreation and population growth, and long-term projected drought, there are some very rare trout fisheries on the GMUG. The Forest contains some incredibly unique and vulnerable desert settings that harbor coldwater fisheries, including some with native trout stocks, as well as some places that might come to be the future strongholds of conservation populations during the life of the GMUG's revised Forest Plan. Trout Unlimited would suggest additional segments be reconsidered through the lens of Outstandingly Remarkable fisheries habitat.

Recreation

According to the GMUG Draft Wild and Scenic River Eligibility Evaluation, a recreation ORV includes: [Idquo]recreation opportunities that are, or have the potential to be, popular enough to attract visitors from throughout or beyond the State of Colorado.[rdquo] Additionally, [Idquo]Visitors are willing to travel long distances to use the river resources for recreational purposes[rdquo] and [Idquo]river-related opportunities including ... fishing.[rdquo] Because of the obvious value of our recreational fisheries on the GMUG, Trout Unlimited suggests an additional layer of fishing-based recreational segments be included in the eligibility evaluation and subsequent Proposed Plan.

Specific Segments

As state above, TU agrees that the stream segments proposed in the Draft Plan for Wild and Scenic Eligibility are qualified and deserving, and we fully support the inclusion of the 118 stream miles deemed eligible for Wild and Scenic designation in the Draft Evaluation. Those stream miles include 14 streams and stream complexes divided into 33 segments found on:

- Copper Lake/Creek

- Cow Creek

- Kelso Creek

- North Fork Escalante Creek

- Oh-be-joyful Creek

- Points Creek

[bull] Roubideau Creek

[bull] San Miguel River

[bull] Tabeguache Creek

[bull] Upper West Soap Creek

[bull] West Elk Creek

[bull] Anthracite Creek

[bull] Fall Creek

[bull] Muddy Creek

According to the above criteria, and additional merits identified by TU partner groups, several specific places on the GMUG have drawn our attention and we would reiterate our request for further examination of W&S eligibility.

Additional segments for consideration include:

[bull] Horsefly Creek [ndash] The largest tributary to the lower San Miguel and home to a population of CRCT. In a geography where river protections, specifically W&S eligibility on the BLM, is being downgraded, free-flowing Horsefly Creek harbors a remote setting, wild characteristics, recreational value, and outstandingly remarkable attributes that should warrant eligibility. We recommend eligibility for approximately 17.8 miles, from the source to the National Forest boundary, citing ORVs of fish/rare species, wildlife and botany.

[bull] Cow Creek and Tributaries [ndash] The eligible segment recognized in the Draft Plan should be extended downstream to the Forest boundary. The documented ORV for exceptionally high biodiversity applies further downstream than the current recommendation indicates, including resident populations of CRCT that contribute to recreational value within the GMUG and farther downstream to the confluence of the Uncompahgre River. It's Trout Unlimited's sense that the segment deemed eligible on Cow Creek was shortened due to sympathetic considerations for the Rams Horn Reservoir proposal that should not be factored into eligibility evaluation.

[bull] East, Middle and West Cimarron Creeks (above Silver Jack Reservoir) [ndash] These streams support wild trout including CRCT populations and provide unique scenic and wild qualities. (See Recommendations for Specific High Value CRAs above.)

This is, for the time being, an incomplete list, designed in part to stimulate change in eligibility framework as the planning process moves forward. Additionally, we would join our partners at American Rivers, American Whitewater, High Country Conservation Advocates, Pew Charitable Trusts and the West Slope Conservation Center in asking planning staff to reconsider eligibility for the seven stream segments removed from the previous Draft Plan for Wild and Scenic Eligibility due to unfounded reassessment of existing eligibility.

In the 2019 draft Wild and Scenic eligibility evaluation cited in the Draft Plan, the Forest chose to reevaluate the eligibility of multiple stream segments and proposed to remove eligibility previously established for the following stream segments with what we consider insufficient documentation or justification:

- [bull] Slate River
- [bull] East River
- [bull] Lower Taylor River
- [bull] Bear Creek
- [bull] Escalante Creek
- [bull] Bridal Veil Falls
- [bull] Ingram Falls

Of those, TU is most concerned by the removal of the Lower Taylor River, a scenic river of free-flowing nature that qualifies for Gold Medal fishery status for roughly 20 miles between Lottis Creek and the Forest Service boundary near Almont and offers access to outstanding recreational values unique to the GMUG that warrant inclusion as Wild and Scenic eligible.

Additional Clarifications

There are several corrections needed in the [ldquo]Segment Descriptions[rdquo] for eligible Wild and Scenic Rivers described in Appendix 11. A more accurate description is needed in the discussions for Fall Creek, Kelso Creek, Points Creek, and the North Fork of Escalante Creek (pages 310-327) where the presence of cutthroat trout is rated as a high value. Recommended changes underlined in italics:

[bull]Description of Outstandingly Remarkable Value: [ldquo]Fall Creek contains a unique and important greenback cutthroat trout conservation population supports a core conservation population of green lineage Colorado River cutthroat trout (*Oncorhynchus clarkii pleuriticus*) used by CPW as brood stock. Fall Creek provides excellent habitat for this population of cutthroat trout to remain intact.

The same clarification is needed in the Kelso Creek, Points Creek, and North Fork of Escalante Creek descriptions of Outstandingly Remarkable Value.

Partnership

Trout Unlimited would like to be considered a partner 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 established as the norm in the years to come.

We appreciate the extensive outreach and willingness of GMUG planning staff to both share and solicit information, and we thank you for considering these comments in the analysis of the Draft Revised Land Management Plan. Trout Unlimited strives to be a constructive partner to the Forest Service and other user groups in future land management on the GMUG National Forest and we look forward to continued collaboration throughout the remainder of the planning process.