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Comments: [External Email]GMUG Draft Forest Plan Review

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Dear Sirs, attached are my comments to be used for the review of the draft GMUG Forest Plan. Thank you for giving me this opportunity

[Copied from attachment]

Dear Sirs;

Thank you for allowing me the opportunity to participate in the development and review of the DRAFT Grand Mesa, Uncompahgre and Gunnison (GMUG) Forest Plan revision process. I am the retired Region 2 Fisheries and Aquatic Ecology Program Manager for the USDA Forest Service. While in this position I had considerable involvement in land management planning as well as instream flow development, riparian and wetland management. aquatic invasive species program development and aquatic Threatened, Endangered and Sensitive species management. I look forward to this opportunity to assist the GMUG in their future planning efforts. I am participating as a public citizen with affiliations to conservation organizations and professional organizations.

While there are numerous resource areas and related documents associated with this process, I will focus my efforts on addressing aquatic, riparian and wetland portions of the draft Forest Plan document. Specific areas of consideration include:

1. Forest level resource identification of aquatic, riparian and wetland ecosystems in relation to overall management.
2. An overall vision of aquatic systems that includes potential climate change influences within as well outside the of the GMUG administrative boundaries that are influenced by management activities.
3. Riparian and Wetland ecosystem health, productivity and protection.
4. Stream channel connectivity, sensitivity to management, and direction to ensure stream connectivity to associated riparian areas are considered.
5. Stream habitat condition and monitoring are considered as well as sensitivity of different stream types and geology are considered in management direction.
6. Threatened, Endangered and Sensitive species as well as Management Indicator Species management are a

valued part of the future management by the GMUG

7. Aquatic invasive species are identified by the plan as a [ldquo]present and future[rdquo] threat to native AND valued non-native species.

8. The GMUG embraces the language in The Wilderness Act (1964) that includes maintaining and restoring natural processes and ecological diversity including WHEN NECESSARY by law the removal of non-native species and restoration of native populations of fish and wildlife.

## Review Process

My comments will be addressed by page number, paragraph and sentence (if necessary). It is my attempt to only include comments that I feel will improve management decisions for aquatic, riparian and wetland integrity and associated species.

Page 1 [ndash] What is a Forest Plan? This section of the of the planning documents focuses on [ldquo]active[rdquo] management of multiple resources [ldquo]The GMUG[rsquo]s forest plan guides projects implementation[hellip]..and outputs for the national forests. However. In the Forest Service Direction (36 CFR 219.7) there is considerable language addressing ecological integrity, system drivers and creation of areas that MAY focus on active management as well as protection of rare and or unique ecosystems. My point is that there is considerable direction within the CFR regulations that direct the Forest to take a more active role in ecological sustainability than is identified in the introduction. The concepts of sustainability, protection and recovery of not only terrestrial vegetation but All ecosystems need to be considered in this effort.

Figure 1. further shows the focus of traditional management activities that should be questioned in this document. Why were examples of traditional activities such as [ldquo]Timber sale, etc.[rdquo] identified and not other important resource management activities such as riparian restoration, rare resource protection such as wild and scenic river decisions. I think this graphic needs to be either changed to show social, economic, ecological sustainability identified in the sentence following figure 1, and not give the perception that we still only work on purely traditional [ldquo]projects[rdquo].

Page 2-paragraph 1: As stated in the CFR 219 regulations on the planning rule, [ldquo]promote ecological integrity of national forests while considering social and economic sustainability.[rdquo] The beginning of this document does not follow this direction but just the opposite, [ldquo]promote social and economic sustainability while considering ecological integrity[rdquo]. This has been the past model that overall has not worked well for ecological sustainability and integrity.

Page 3- Project and Activity Consistency: Where is there language in this section concerning other pertinent laws such as The Multiple Use sustained yield Act, Clean Water and Air Acts, etc. There should be some reference to this direction so the public understands what resources will be addressed for given projects.

Page 4 Desired Condition, line 2: Ecological Characteristics are not an [ldquo]and/or[rdquo] part of direction under the planning rule, Ecological characteristics are a main consideration under the planning rule. This needs to be rethought to include the Planning Rule direction.

Page 7, Ecological Sustainability: This section is written quite well but does not seem to correlate with the information presented previously in the documents. It would appear that water related topics should be a major part of future management given the effects of climate change on water quality, quantity and ecological processes. A specific management area that encompasses riparian areas should be included. I would suggest presenting the miles of stream and acres of lakes to illustrate their importance in future management decisions.

Page 5, Management Areas: A search of the term [ldquo]Riparian Management[rdquo] on the search engine produced 18,000,000 hits. Indeed, riparian areas are an enormous topic of management due to several reasons:

1. While comprising approximately 1% of the landscape in the western United States (USDA NRCS, 1996) they are disproportionately important for management reasons such as grazing, mining, recreation, fish and wildlife and biodiversity, and water resources.
2. Flows through riparian soils regenerate soils with ground water
3. They harbor a very disproportionate number of endangered and threatened species of fish, wildlife, plants and invertebrates within their boundaries.
4. Ranchers often seek riparian areas for livestock forage due to the high vegetation productivity.
5. Riparian areas act as filters for sediment, toxins and nutrients that are transported downstream from upper reaches.
6. When properly managed, riparian areas absorb energy from flooding and reduce downstream impacts.
7. Riparian areas are extremely productive and have major influences on terrestrial wildlife.
8. An economic evaluation of sportsman in 2006 revealed that anglers spent approximately 5.5 million days on the water and spent \$819,000,000 enjoying their sport in Colorado. (Congressional Sportsmen.com.)
9. There are approximately 36,000 miles of rivers and streams on the GMUG National Forest; yet less than 4% are being considered for wild and scenic designation.
10. There are literally thousands of instream diversions in within the GMUG, many are not monitored for using their allotted flows and structures to divert water are out dated and ineffective. This could have a dramatic influence on downstream uses.

I am advocating including the Riparian Prescription (Management Area 9A) that has been removed from inclusion in this draft. As a Forest Level Aquatic and Riparian Biologist, the 9A prescription was a major tool used by Land Managers to help understand potential impacts and mitigation from a number of management proposals. The direction for all our potential management action was identified in Standards and Guidelines of our 1982 Land management Plan.

One excuse I have heard from managers was that Riparian areas were not delineated to use when projects were identified, that is not the case anymore. Riparian mapping with the Forest has also been conducted.

I could not find any language in the Planning Rule that a 9A prescription be removed from GMUG forest Plan. The Removal of the Riparian 9A prescription is a major step back in the concept of multiple resource management and will no doubt result in further negative impacts to riparian areas and their ecological, recreational and economic values in and outside the National Forest. Please reconsider including the riparian area 9A prescription and direction into this Forest Plan.

Page 18 Standards: what is the distance to the [ldquo]outer Gorge[rdquo] mean and why are wetlands only considered that are greater than 0.25 ACRES. We have springs that have very unique flora and Fauna. This is a subjective value as well as the [ldquo]gorge[rdquo] measurement. There are numerous low gradient depositional stream reaches that are very important for soil/groundwater storage that extend further than 100 feet from the waters edge. There should be specific direction for these areas if we are going to improve ecological integrity of riparian ecosystems.

Riparian Management Zones, page 20: We need to stop using words that do not express true meaning of the direction given. [ldquo]Should or could[rdquo] indicates there is some desire but not necessarily direction. This type of language can result in actions that were no meant by the standard or guideline. The words will, shall provide directions for what we are trying to promote in a clearer path that will be followed. I realize these were topics a long time ago when the Watershed Condition handbook was developed but not resolved.

FW-OBJ-AQTC-03 page 21: What are [ldquo]environmental flows[rdquo] ?

FW-OBJ-AQTC-03, page 21: It appears that the term desirable non-native is

Not included in this text. There is direction for management of fish that are of recreational benefit.

Page 21 - standards; It is imperative that an instream flow standard be a part of this section. This probably the biggest area of concern we currently have for aquatic ecosystems.

FW-GDL-AQTC\_08 This standard needs to include healthy ecological conditions for beavers. There should not be conflicts with other resource areas for maintaining a later seral stage for beaver food, dam and lodges in appropriate habitats (low gradient erosional channels).

Native Species Diversity, page 26 - Aquatic species are poorly represented in this section. No at-risk species of aquatic organisms such as native cutthroat or bluehead suckers.

Rangeland, Forage, and Grazing, page 57: One of the biggest problems with aquatic resources and grazing is maintaining adequate late seral woody vegetation is the [ldquo]shade-zone[rdquo] of aquatic systems. Climate change as well as observed temperature elevation studies show that in water temperature shading zones streams need late seral stage willows and other woody vegetation to not only lower water temperatures but provide terrestrial food for fish and other aquatic organisms. We desperately need to address this shading issues, not utilization.

Rangeland, Forage, and Grazing, page 57: I see no direction for potential water quality issues such as E.coli levels that exceed water quality standards. There are sectors of the public that are measuring and taking to task on this issue

Recreation, page 59: I see no mention of recreational activities such as trails and avoidance of riparian areas. There should be directions to keep trails out of riparian areas where the cause erosion, wildlife behavioral impacts, etc.