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Comments: Staff and board members of the Upper Gunnison River Water Conservancy District (UGRWCD) have studied with interest your scoping document assessing planning needs for the GMUG National Forests; Gunnison National Forest is the source of most of the water in the Upper Gunnison River Basin.

The mission of the UGRWCD is to participate actively in all issues involving the water resources of the Upper Gunnison Basin. We are currently deeply involved in a Watershed Management Plan process, as part of Colorado's Water Plan, ordered by the Governor of Colorado in 2013 to address perceived projected water shortages for Colorado by the middle of the 21st century. (A paragraph giving an overview of Colorado's Water Plan process is attached at the end of this letter.)

Your scoping of needs to address seems clear, thorough - and highly consistent with both the direction and many specifics of our own ongoing needs assessment for planning. We encourage action on the need to maintain, improve and enlarge small high-country storage but not necessarily creating new surface storage (except for beavers?); we support judicious experimentation in management for the 'forest of the future' (i.e., restocking densities, shifting tree types) that both reflect a warming climate and a probable diminishing water supply through the coming century, and that might also increase groundwater storage and annual water yield without erosion. We also applaud your intention to move the Forest Plan away from a strict prescriptive 1980s management approach, to a more adaptive approach that responds to new approaches while still assuring that ecologically sound guidelines and best management practices are upheld. Our Watershed Management Plan process is grounded in the same intention: we are working from demographic projections indicating an increased demand for water by midcentury, and scientific projections indicating a gradually reduced water supply throughout this century due to already perceived warming. But what will actually happen is not known for sure; thus we plan to focus on sound 'no regret' type measures that will maintain or improve the health and effective use of our watersheds while protecting our existing balance of human uses.

We were accordingly drawn to a statement in your Scoping Materials, in the section on 'Incorporat(ing) Best Available Science, Update to Existing Law and Policy': 'There is no current forest plan direction specifically for watersheds. Forest plans are to identify priority watersheds for restoration.'

Our Watershed Management Plan process is based on a watershed-level assessment of needs and options for addressing those needs. We have seven specific and somewhat diverse watersheds in the Upper Gunnison Basin (which like all headwaters basins consists primarily of tributaries streams that gather into a river lower in the basin). Each of these watersheds has its own 'human-use personality,' ranging from almost purely agricultural uses (Ohio or Tomichi Creeks), to those with an amalgam of uses including towns, economically significant recreation industries, unwelcome remnants of a mining industry, et cetera (Lake Fork and East Rivers).

What all of our watersheds have in common is that most of the water comes down from the Gunnison National Forest. Thus any watershed planning that we do has to be done in close collaboration with the Forest Service. We have come to realize that we are not starting from scratch in this planning process; one of our main tasks is to discover and help coordinate everything that is already going on in the Upper Gunnison Basin, to make sure that everyone working on 21st-century planning knows what everyone else is doing, and to acknowledge good efforts that complement the efforts of others, with a minimum of uncoordinated duplication of effort.

An example of this kind of effort is a project begun in the Upper Gunnison in 2012 by The Nature Conservancy (TNC), variously known as the 'Wet Meadows Project' and the 'Sage Grouse Project.' For five years, with TNC basic funding, TNC's Betsy Neely pulled together participants from the Forest Service, the Bureau of Land Management, the Natural Resources Conservation Service, the Colorado Division of Parks and Wildlife, the UGRWCD, and other local organizations, in a project to restore once wet meadows that had been turned into dry meadows by lowered water tables due to gullyng. The project is showing good restoration results, including increases in meadowland suitable for the needs of the Gunnison Sage Grouse, our 'canary in the mine' for ecosystem health.

The Nature Conservancy had budgeted five years for this project, ending in 2016. At that point, none of the local,

state and federal groups wanted to let the program drop, so the UGRWCD took over the coordination effort, hiring a contractor to work with the above-mentioned agencies which all wanted to keep the project going. This will be part of our Watershed Management Plan - and we hope it is the kind of program that will be part of the GMUG Forest Plan too, as 'your water becomes our water' irrespective of boundaries on the map. We hope that, as the Forest Service moves into forest planning 'specifically for watersheds,' and identifying 'priority watersheds for restoration,' we will be able to work closely with you, contributing what we are learning about watershed management as well as learning from your work.

Frank Kugel, General Manager
Upper Gunnison River Water Conservancy District

Colorado's Water Plan and the Upper Gunnison River Basin

Colorado's Water Plan was created by nine Basin Roundtables created in 2005 by the Colorado Water For the Future Act (HB 05-1177). The UGRWCD participated through the Gunnison Basin Roundtable in the creation of a Gunnison Basin Implementation Plan for the entire Gunnison River Basin. (The US Forest Service participated in this planning process through the GMUG office.) This was incorporated into Colorado's Water Plan adopted by the Governor in December 2015.

The UGRWCD is now in the process of working out the role of the seven Upper Gunnison River watersheds in carrying out Colorado's Water Plan with its midcentury horizon - a time when known supply, at current use scenarios, will probably be insufficient by several hundred-thousand acre-feet for anticipated demand. Our overarching goal in the Upper Gunnison River Basin is to carry our share of the burden in the State Water Plan's processes while doing everything possible to protect existing users and uses in the Upper Gunnison River watersheds. Our entire local economy is tied intimately to factors in the natural and cultural environment over which we have little or no direct control - adequate water resources above all for agriculture, communities, various recreational activities, and the general vitality and beauty of our basin.