Data Submitted (UTC 11): 11/24/2021 11:00:00 AM
First name: Ashley
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Organization: Uncompahgre Watershed Partnership
Title:
Comments: Hello Mr. Stewart and Ms. Staley,

I serve as the technical coordinator for the Uncompahgre Watershed Partnership. Tanya Ishikawa and I have been working on comments on the GMUG Draft Forest Plan. We have attempted to use the online comment tool to submit our comments via the GMUG website multiple times. However, the server appears to be down (as reported in webpage error messages). Please accept the attached comments on behalf of the Uncompahgre Watershed Partnership.

Due to the Thanksgiving holiday and rapidly approaching deadline, we would appreciate you confirming receipt of our comments. Thank you.

Respectfully,

Ashley

Ashley Bembenek

(she, her, hers)

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[ATTACHMENT 2021-11-23 UWP Comments on the Draft Forest Plan.pdf ARE COPIED BELOW. NOTE PDF CONVERSION MAY RESULT IN FORMATTING ERRORS.]

Comments on the GMUG Draft Forest Plan Revision

The Uncompahgre Watershed Partnership (UWP) respectfully submits the following comments on the Draft Revised Land Management Plan Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests (Forest Plan), the Draft Environmental Impact Statement for the Land Management Plan Revision Grand Mesa, Uncompahgre, and Gunnison National Forests Volume 1: Chapters 1, 2, 3, and 4 (DEIS Volume I or DEIS), and the Draft Environmental Impact Statement for the Land Management Plan Revision Grand Mesa, Uncompahgre, and Gunnison National Forests Volume 2: Appendices 1 through 6 (DEIS Volume II or DEIS).

Introduction

UWP exists to help protect the natural, economic, and scenic values of the Upper Uncompahgre River Watershed. We work to inform and engage all stakeholders and solicit input from diverse interests to ensure collaborative restoration efforts occur in the watershed. To accomplish this mission, UWP works collaboratively with local and state governments, federal agencies, and the community to reduce the impact of past management actions, especially the impacts attributed to historic abandoned mining operations. UWP collects water quality and environmental data to support science-based land management actions. Consistent with our mission, UWP[rsquo]s comments focus on water quality, watershed health, and the protection of water supplies.

Riparian Management Zones and Groundwater-Dependent Ecosystems

In general, UWP supports the desired conditions for Riparian Management Zones and Groundwater- Dependent Ecosystems (RMGD). We appreciate the comprehensive approach used to develop the desired conditions. However, there is an opportunity to improve the objectives associated with the desired conditions.

UWP supports FW-OBJ-RMGD-06 which, in part, calls for at least 2,500 acres of riparian andmeadow habitat restoration or enhancement in each 10-year period following plan approval (Forest Plan page 18). Restoring or enhancing a total of 5,000 acres of riparian or meadow habitat each decade is a modest goal.

At a minimum, the Forest Plan and DEIS should be revised to reflect the 5,000-acre goal included in objective FW-OBJ-RMGD-06. UWP strongly supports a far larger goal for restoration and enhancement of riparian and meadow habitats and hydrologic function in streams. Not only would this improve water quality and quantity it would provide an opportunity to increase carbon storage, protect water supplies, and improve watershed resilience.

FW-OBJ-RMGD-06 uses the term meadow. Because meadow is a poorly defined term, we recommend meadow be replaced with wetland to more closely align with the terms used to identify riparian management zones.

The DEIS stated that roads proximal to waterbodies are the leading concern identified in the watershed condition framework ratings assessment1. [Appendix 7 of the Forest Plan states that the GMUG has 242 subwatersheds. The DEIS reports 235 subwatersheds in the GMUG. Please, resolve the discrepancy between these documents.] Thus, the Forest Plan should include an objective to address road crossings and routes in the RMGD to improve or at least maintain watershed conditions across the GMUG. Further, the Forest Plan should include a standard to assure that routes avoid the RMGD to the extent feasible and where crossing are necessary provide the appropriate measures to maintain or improve riparian zone connectivity and function.

FW-STND-RMGD-07 provides two categories to delineate RMGD features (Forest Plan page 18). Both categories require improvement. The Category 1 delineation should include ephemeral streams because like other streams, ephemeral support critical ecosystem services and provide valuable habitat. Given the importance of wetland ecosystems, the one-quarter acre minimum size should be removed from the Category 2 delineation. Including ephemeral streams and removing the arbitrary wetland size threshold would assure that all riparian and wetland areas are protected and continue to provide critical ecosystem services.

UWP supports the intent of FW-GDL-RMGD-13 (Forest Plan page 20). But the guideline should not refer to

channels formed by erosion attributed to firelines as stream channels. We recommend the language be revised (e.g., erosional channels).

UWP supports FW-GDL-RMGD-14, but the purpose, to monitor and assess changes to groundwater- dependent flows, would be accomplished more effectively if the guideline also required monitoring of groundwater elevation. Groundwater elevation data will provide additional data to assess changes in groundwater-dependent flows which is critical to supporting the desired conditions for RMGD.

UWP strongly supports FW-OBJ-REC-04 which calls for 100 acres of alpine ecosystem restoration. High alpine ecosystems face multiple threats due to increased recreation and a changing climate. High quality alpine ecosystems are essential to water quality, water supply, and form a substantial portion of public drinking water supplies, thus UWP strongly recommends that the Forest Plan to include a larger alpine ecosystem restoration goal in this objective. UWP also supports removing existing campsites within the riparian management zone as proposed in MA-OBJ-EMREC-02 (Forest Plan page 183).
Watersheds and Water Resources Section
UWP supports desired condition FW-DC-WTR-03 which seeks to assure that classified water uses and the associated water quality standards are attained in all waterbodies on the GMUG. On Forest Service lands, water quality standards and classified uses are most commonly impaired due to abandoned historic mine features that elevate metal concentrations in down-gradient streams and waterbodies. Despite this widely known fact (see DEIS at pages 151, 323, and 350), the Forest Plan lacks meaningful objectives, standards, or management approaches dedicated to reducing the impact of abandoned mine lands on water and watershed resources2. [UWP recognizes that FW-CD-ENMI-02 addresses abandoned and inactive mines but finds the directive insufficient because it does not address the large and widespread water quality and aquatic life impacts of these features.] The following objective should be added to the Forest Plan:

FW-OBJ-WTR-05: Every ten years following the adoption of the plan, at least 10 historic abandoned mine features will be reclaimed or restored to protect water quality, classified water uses, and public health.

Metals loading from historic abandoned mine features can reduce the quality of public water supplies. However, it is increasingly common for municipal wastewater treatment facilities to face permit compliance issues due to elevated metal concentrations in the facilities[rsquo] receiving waters. These metals often originate from historic abandoned mines on Forest Service lands. Addressing pollution attributed to historic abandoned mine features on the GMUG will benefit local communities by addressing the root cause of pollution, rather than forcing taxpayers to pay for upgrades to municipal water and wastewater treatment systems. The following management approach should be added to the Forest Plan:

Coordinate with Federal, State, Tribal, and local government, watershed groups and other local stakeholders to improve waterbodies included on the List of Impaired Waters and/or Monitoring and Evaluation List. Coordination efforts include project planning, funding, implementation, and evaluating project outcomes.

CCWC generally supports desired condition FW-DC-WTR-01. But recommends that all watersheds achieve or are moving toward a higher functioning condition class (i.e., not limited to priority watersheds).
Timber and Other Forest Products
Despite the use of best management practices, the production of timber and other forest products (TMBR) invariably reduces the quality of soils and watershed and water resources to some extent. These impacts also influence the condition of riparian management zones and groundwater-dependent ecosystems. Therefore, at a minimum, the following text should be inserted into the beginning of the TMBR section:

See also direction in the sections Soil (SOIL), watershed and water resources (WTR), and riparian management zones and groundwater-dependent ecosystems (RMGD).

Inserting this language would make the TMBR section consistent with other sections (e.g., WTR section Forest Plan page 40) and more importantly would help assure that future vegetation management activities are evaluated with respect to all of the ecological resources that the activity may impact.

FW-STND-TMBR-02: proposes to restock harvest areas [ldquo]within 5 years after the final harvest.[rdquo] Given the substantial impact of bare soils on watershed condition, UWP cannot support a 5-year time frame. A shorter time frame, preferably 2 years or less, is more appropriate to support the desired conditions identified throughout the Forest Plan.

The paragraph used to reference other forestwide standards incorrectly references WTR-06. The Forest Plan does not identify a WTR-06. Please correct this reference.

Wild and Scenic River Eligibility

UWP supports the inclusion of Cow Creek as eligible for Wild and Scenic River designation. UWP supports wild and scenic river eligibility for all streams and rivers in the Upper Uncompahgre watershed that are identified in the comments from American Whitewater and the Outdoor Alliance. The additional management considerations associated with Wild and Scenic Rivers eligibility are consistent with UWP[rsquo]s mission and are the primary reasons for our support of including more waterways as eligible.

Priority Watersheds

UWP recommends that the Forest Plan identify the Uncompahgre River Watershed upstream of Ouray as a priority watershed. Many segments in the Upper Uncompahgre Watershed are listed as impaired for several metals due, in large part, to historic abandoned mine features located on Forest Service lands. The Water Quality Control Division is currently drafting a total maximum daily load (TMDL) for this watershed. Because of the pending TMDL, the Forest Plan should identify the Uncompahgre Watershed upstream of Ouray as a priority watershed.

Administrative changes allow for the designation of additional priority watersheds. However, the criteria to select priority watersheds are not provided in the Forest Plan. Please provide these criteria and incorporate the criteria into the monitoring plan to assure that additional priority watersheds are identified and restored during the life of the Forest Plan.

Rangelands, Forage, and Grazing

We acknowledge the importance of livestock grazing to social, economic, and cultural aspects of rural communities. However, rangeland management practices, particularly in municipal watersheds, are outdated. UWP supports FW-OBJ-RNG-03 and strongly supports an update to the range management plan which has not been revised since 2003. Following approval of the Final Forest Plan, the range management plan should be revised immediately to assure that rangeland management supports the desired conditions and meets the standards included in the Forest Plan.

Carbon Storage

In the Forest Plan, carbon storage is briefly discussed in two locations (Forest Plan pages 17 and 77). Promoting carbon storage is beneficial to many forest values and uses including maintaining high water quality in forested watersheds, timber harvest via more rapid reforestation, improved wildlife habitat, etc. Therefore, the Forest Plan should better address the critical ecosystem service of carbon storage. Ontl et al., 20203 summarized forest management strategies that promote carbon storage. We recommend these strategies be implemented to increase carbon storage in the GMUG. [Ontl, Todd A., et al. "Forest management for carbon sequestration and climate adaptation." Journal of Forestry, Volume 118, Issue 1, January 2020, Pages 86[ndash]101, https://doi.org/10.1093/jofore/fvz062.]

Monitoring

The 2012 Planning Rule requires forest plans to include iterative and continuous assessment, planning, and monitoring. It also explains the importance of implementation, effectiveness, and condition monitoring. While, UWP supports these improvements to the Forest Plan, we have a number of suggestions.

The USFS and other organizations have invested a great deal of resources to inventory, monitor, and protect

fens on the GMUG due to their immense ecological value. Consistent with past efforts, the management approach for RMGD calls for continued inventory and evaluation of fens and springs (page 20). Additionally, FW-DC-RMGD-05 states that [ldquo]fens [will] continue to accumulate peat.[rdquo] UWP recommends that the Forest Plan include monitoring activities specific to the maintenance, improvement, and protection of fens and other groundwater-dependent ecosystems. These monitoring activities would support adaptive management activities to further protect groundwater-dependent ecosystems. The Forest Plan should identify potential adaptive management measures that would be employed if monitoring indicates a decline in the condition of a fen or groundwater-dependent ecosystem.

UWP supports the intent of monitoring question 94 which seeks to assess the rate of water quality standards and classified use attainment (Forest Plan Table 24). [4 Table 24 includes a numbering error, where 9 is skipped and 10 is used five times. Please correct the numbering error.] However, stream length is a more meaningful indicator of water quality standards and classified use attainment. Please add stream length as an indicator for this monitoring question.

Monitoring question 10 (Forest Plan Table 24) includes stream temperature to assess the status and trend of aquatic ecosystems. Temperature standards are applied to all waterbodies in the GMUG to protect aquatic life. If temperature standards are not met, the segment is placed on the List of impaired Waters or Monitoring and Evaluation List. Thus, Regulation 93 should be considered a data source for this monitoring question.

Monitoring question 11 (Forest Plan Table 24) identifies northern goshawk, sage grouse5, [5 Currently reads sagebrush, but we believe the intent was sage grouse. Please correct.] and beaver as focal species. However, the table does not provide indicators, measures, or actions for northern goshawk or sage grouse.

Plan Fails to Identify Ecosystem Services

Chapter 2 Part III of the Forest Plan is titled Ecosystem Services and Multiple Uses of the National Forests. Yet, Part III fails to address any of the ecosystem services provided by watersheds throughout the GMUG; Part III is exclusively focused on multiple uses. To address this deficiency, ecosystem services including carbon storage, local climate interactions, water filtration, nutrient cycling, soil development and stabilization, and groundwater and surface flow regulation should be addressed in the Forest Plan. The DEIS should evaluate the effect of each alternative on ecosystem services. The benefits of ecosystem services are not fully understood, thus a conservative approach to protecting these services is necessary as temperatures increase, water supplies decrease, and population growth continues.

Comments on the DEIS

The DEIS identifies the negative impacts associated with timber harvests in several places (see DEIS pages 118, 120, 127, etc.). The DEIS also acknowledges the potential for other management actions, like grazing, trails, or route development, to cause detrimental impacts. Yet, the DEIS completely fails to quantitively assess the impacts of timber harvest and other management activities. It is inadequate to compare the impacts of each alternative based solely on the number of acres identified as suitable for timber harvest.

Due to the assessment effort completed in 2018, prior to the Forest Plan and DEIS, there is ample information available for quantitative assessment. Many of the attributes used to complete the watershed condition framework ratings could be used to quantitatively evaluate the effects of each alternative. For example, assessing the impact of roads associated with timber and existing roads issues would be relatively straightforward due to the detailed assessment work completed in the watershed condition assessment framework.

Instead, the DEIS postulates that all impacts will be mitigated at the same rate despite different timber production rates in Alternatives A through D. It is irresponsible to suggest that best management practices can be used to mitigate the impacts of all management activities when existing assessments indicate that watershed conditions are impaired as a result of past management activities. The Forest Plan states that monitoring will occur [ldquo]within existing staffing and budgetary limitations[rdquo] (Forest Plan page 102). Especially because there

is no additional commitment to monitor impacts the DEIS must quantitatively assess the impacts of each alternative prior to finalization of the plan.

The DEIS incorrectly reports that [ldquo]21 streams totaling approximately 141 miles that do not meet water quality standards (table 133)[rdquo]6. [This sentence or a reference to it occurs on pages 113 and 151 of the DEIS.] This statistic is incorrect because it was developed using an outdated version of the List of Impaired Waters and included GIS errors. The following provides a current and accurate summary of the impaired waters in the GMUG:

Approximately 1,230 miles of streams on the GMUG do not meet one or more water quality standards7. [Based on Regulation #93 [ndash] Colorado[rsquo]s Section 303(d) List of Impaired Waters and Monitoring and Evaluation List, effective date 8/14/2021.]

Table 133 should be updated to reference the current version of the Section 303(d) List of Impaired Watershed and Monitoring and Evaluation List8 [https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=9662&fileName=5%20CCR%201002-93]

The desired conditions, objectives, standards, and management approaches articulated in the Forest Plan are a substantial improvement over the current plan. Unfortunately, the DEIS does not fully consider how each alternative would affect the ability to achieve the desired conditions. Without a more thorough and quantitative analysis, the DEIS does not demonstrate which alternative provides the best opportunities to meet desired conditions for each resource. Thus, UWP strongly urges the Planning Team to further revise the Forest Plan and DEIS prior to finalizing the Forest Plan.

Thank you for your time and consideration. We appreciate the opportunity to provide comments on the Forest Plan.

Thank you,

Tanya Ishikawa Communications Director

Uncompahgre Watershed Partnership And

Ashley Bembenek Technical Coordinator

Uncompahgre Watershed Partnership