



**Email sent to:** [Gilaplan@fs.fed.us](mailto:Gilaplan@fs.fed.us)

June 12<sup>th</sup>, 2017

Matthew Schultz  
Forest Planner  
Gila National Forest  
Forest Plan Revision  
3005 E Camino del Bosque  
Silver City, NM 88061

**RE: Scoping comments on the Gila National Forest Need for Change and Proposed Action on the Forest Plan Revision process.**

Dear Mr. Schultz,

Please accept the following scoping comments from Trout Unlimited (TU) on the Gila National Forest (GNF) Final Needs for Change and Proposed Action for the Gila forest plan revision process. We have reviewed the Notice of Intent (NOI) for the GNF. Our comments will identify issues, which are of concern to our work and the interests of sportsmen and women who participate in outdoor recreational activities within the GNF's 3.3 million acre landscape.

Trout Unlimited is the nation's oldest and largest coldwater fish conservation organization. Trout Unlimited has approximately 300,000 members and supporters who are actively engaged in our work and nationwide including 1,400 members in New Mexico. Our mission is to conserve, protect, and restore North America's coldwater fisheries. Our volunteer members actively utilize and enjoy the resources of the many streams, lakes and watersheds located on the GNF lands. Attributes of these lands and watersheds include clean water, clean air, fishing, hunting, and wildlife viewing opportunities. Within the close vicinity of the GNF, we have four TU chapters (the Bosque, Truchas, Enchanted Circle, and the Gila/Rio Grande chapters) whose members fish, recreate and contribute to on-the-ground restoration efforts within this forest.

Some of the most storied and productive coldwater fisheries in New Mexico and vital water sources for thousands of people are found within the GNF. The planning area is home to native Gila trout and some of the most important recreational fisheries in the state. The GNF also provides important wildlife habitat for mule deer, elk, bighorn sheep, pronghorn antelope, javelina, wild turkey and quail – all important species for sportsmen and women and thousands of individuals who enjoy viewing wildlife.

Our emphasis in these comments will be on the importance of high quality fisheries in the GNF, particularly with regards to native Gila Trout and the need for large-scale habitat improvement and restoration of these watersheds. Considering that multiple watersheds have been devastated due to recent fires, the plight of Gila trout has been exacerbated and recreational anglers have significantly fewer options with viable fisheries available to them. We enthusiastically support the GNF's efforts to restore Gila trout populations into many of the streams on the Forest.

Trout Unlimited would also like to see resources for other activities protected and we believe that with plan revision processes and planning efforts we will be able to develop and implement new forest restoration efforts and thoughtful hydrologic rehabilitation. We believe this forest can produce resilient, sustainable and

highly functioning watersheds that provide for healthy fish and wildlife populations, diverse recreational pursuits, and the numerous traditional uses.

Trout Unlimited has participated in the earlier review of the assessment and needs for change analyses, identifying six key areas of focus we believe the GNF should address. After reviewing the Final Need to Change document for the GNF, we are excited to see the Forest validate so many of our concerns and recommendations. We believe these changes and improvements to the GNF will better protect, conserve and restore coldwater fish species, promote healthy game habitat and populations, preserve hunting and fishing values, and minimize user conflicts. We look forward to working with the GNF on both the revision and implementation of the Forest Plan.

### **The Sportsmen's Vision for the GNF**

Angling and hunting are important uses of National Forest lands. These uses are dependent on high quality waters, outstanding habitat conditions, corridors, healthy watersheds, and appropriate access. Typically these uses are lumped in with other recreational uses such as hiking, sightseeing and camping and rarely receive specific management guidance. Frequently there is significant attention to biodiversity, viability and habitat conditions but rarely if ever is there a direct linkage to sportsmen and their use of these public lands for their traditional activities. 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 but it often provides little incentive for the sportsmen/women community to become engaged in the Forest Service planning process.

Through the use of various management tools, TU hopes to assist the Forest Service in their planning to the benefit of multiple uses and traditional sporting values. What follows under the "Sportsmen's Vision" section are topics we feel necessary in order to protect the integrity of the GNF and its value as one of the most important forest landscapes in the southwest. Below we offer criteria, management actions, and descriptive geographical areas of concern coupled with some considerations for their management that should provide background for the GNF to consider as they move forward in this planning process. We also offer possibilities of how these considerations might become reality in a revised forest plan.

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 their recreational uses, and TU asks them to be considered under an Alternative in the Revised Forest Plan. What is most important is the focus on management from a fish and wildlife centric point of view. Below are examples of areas we believe should be concentrated on from a landscape and watershed perspective.

As we address the Need for Change and Proposed Actions for the GNF, TU suggests that the revised plan provide a strong emphasis on sportsmen/wildlife values. We've evaluated our approach and revised some of our thoughts regarding how a forest plan should incorporate sportsmen's interests. Our emphasis is to provide quality opportunities for angling and hunting by protecting and restoring fish and wildlife habitat for key species. Below are three primary considerations and recommended objectives for the GNF.

1. Fisheries
  - Prioritize watersheds with wild and native fisheries wherever possible for restoration or improvement
  - Manage fisheries for high quality fish habitat and for recreational use
  - Maintain or improve riparian health
  - Manage waterways to retain their outstanding Wild and Scenic values
2. Watershed health
  - Improve watershed health throughout the GNF as some areas are in desperate need of attention
3. Ensure riparian protection by providing strong guidance for buffer setbacks for all types of surface development
  - Promote backcountry hunting experiences by limiting new road and trail development in existing

- Roadless areas and seasonal closure for motorized trail travel
- Road closures where appropriate to enhance wildlife habitats
- Develop road and trail density guidelines and alignments that are conducive to intact big game habitat
- Seasonal closures to motorized trail travel in Roadless areas to coincide with archery season where appropriate

### **Management approaches to emphasize sportsmen/wildlife values**

Trout Unlimited excels at collaboration and relationship building. We would like to be a partner with the GNF in building these new partnerships with sportsmen groups, youth and underserved populations.

1. **Restoration opportunities for Gila Trout.** Trout Unlimited has been involved in a number of restoration projects that incorporate communities and with an emphasis in contributing to ecological sustainability (Carson National Forest and the Upper Rio Grande Initiative as an example in New Mexico) and have witnessed the beneficial social and economic benefits when incorporating such practices. We are pleased and eager to support the GNF as it makes plans to develop different ecological management approaches with sustainability in mind. Restoration projects can have many short-term and long-term beneficial impacts and TU has been strategically involved in numerous restoration projects for sensitive native trout such as Gila trout. Below are some examples where restoration objectives should be addressed for fisheries habitat stability, and ecological and economic resiliency on the Gila.

- High quality fisheries on the GNF and with respect to native Gila trout, requires a commitment to large-scale habitat improvement and restoration projects for these watersheds.
- Due to recent fires, multiple watersheds and consequently native trout presence has been severely impacted. The plight of Gila trout has been exacerbated and recreational anglers have significantly fewer options for recreational fisheries.
- New opportunities are available for restoring Gila trout into streams where populations of non-native Brown and Rainbow trout, and Brook Char flourished prior to the fires. These non-native species were eliminated or at least significantly reduced in the aftermath of the fires in many streams.
- Restore the West Fork of the Gila as the most important recovery stream for species conservation - the series of streams in this larger watershed is a core area for Gila trout. Despite some fire damage in the watershed, stream habitat is in reasonably good shape. High post fire flows and the encroachment of non-native trout have been the biggest problems. We need to develop a complete restoration plan for the watershed including: a) the design and construction of a large fish barrier to protect the system from further non-native fish invasions; b) a piscicide treatment strategy to remove current non-natives; and, c) a Gila trout reintroduction strategy that considers the use of different genetic lineages based on our new genetics information. The ultimate recovery of this watershed would create the largest Gila trout meta-population in existence adding almost 20 miles of water to our current total of 53.8 miles of streams.
- Conduct three more Citizen Science monitoring events on Willow Creek and potentially other streams - The current Gila Recovery Team plans to use data from these events in the new Recovery Plan. Beyond their scientific value, these events are also a key tool for involving local communities and maintaining social and political support for Gila trout recovery.
- Develop a permanent stream temperature-monitoring program on all Gila trout streams in NM - Stream temperature will be the biggest indicator for monitoring the long-term survival of Gila trout. Stream temperature is also strongly coupled with climate variables (air temperature and precipitation), which are expected to significantly change over the 21<sup>st</sup> century. A consistent reliable system for stream temperature monitoring is the key to evaluating and adjusting our Gila conservation efforts over the long term. Existing stream temperature data will be compiled from all known tribal, federal, state, and private sources to develop a comprehensive database for Gila trout. Critical gaps in the existing network need to be identified and filled.

- Conduct a Population Viability Analysis (PVA) for all Gila Trout populations – Utilizing a joint effort with NASA and state and federal fisheries agencies,
- The Whitewater Creek complex (2<sup>nd</sup> best watershed complex available for recovery) is another important watershed for the recovery of Gila Trout. A renovation project is currently being evaluated through the NEPA process and will be essential to the long-term health of this population. The accomplishment of this project will result in many new stream miles of habitat and a large (south fork) tributary that added into the recovery system, along with several important small tributaries.
- Opportunities to expand Gila trout restoration activities identified by the Gila Trout recovery team should be aggressively pursued.
- Opportunities to increase recreational angling opportunities should be evaluated and developed.
- In some cases, opportunities exist for acquisition of private lands to improve public access and with the GNF’s commitment to improve stakeholder relationships and develop new partners; TU believes this can be achieved, using private donor investments and collaborative fundraising.
- The use of best available science and strong management direction will provide the Forest with an increased number of options for management approaches. We support the GNF’s desire to include plan direction for adaptive management. We believe that utilizing a watershed approach provides a host of unique adaptive management options that will benefit the health of the forest as well as provide multiple benefits to the public that use the forest’s resources.

2. **Monitoring and Evaluation.** Under the Forest Planning Rule of 2012, monitoring requirements have been adjusted to allow the Forest to be more reactive to problems, which may arise. We support the Gila’s effort to implement an updated monitoring program and offer the following suggestions:

- Implement a monitoring strategy and requirement component with each restoration project developed for the Gila. Make sure these are transparent and publicly accessed for input, implementation, and recognize success when success occurs.
- Work with the New Mexico Game and Fish Department (NMGFD) in developing, improving and implementing stream habitat monitoring activities within the Gila. We would encourage the Gila and NMGFD to partner with TU in implementing an aggressive monitoring plan.
- Employ the use of Citizen Science monitoring where feasible and as a way to help offset some of the funding deficits the Gila is likely to experience. Trout Unlimited promotes and uses Citizen Science applications with our many volunteers across the country. We have a developed professional aquatic monitoring application process and training which helps our volunteers develop effective citizen science monitoring activities. We strongly urge the GNF to take advantage of these and other available partnerships to implement stream temperature monitoring and macro invertebrate sampling. In the past the New Mexico TU Council and TU chapters have procured funding to do stream temperature monitoring and are willing to continue as partners in these areas.

3. **Ecological Changes.** Trout Unlimited supports the Gila’s effort to develop desired conditions and standards, guidelines and management approaches that better reflect baseline vegetation components and trends on the Forest. We understand the difficulty in assessing factors which are hard to control, such as climate change. However, by implementing approaches such as that discussed in the Final Need for Change document, we believe the Gila is on the right track. Due to the Gila’s history with recent fires, opportunities now exist for restoring native herbaceous vegetation, limit woody species, and prevent non-native invasive plant establishment, all which will restore ecological stability, improving watershed productivity and eventual stable fish and wildlife habitat. Considerable research exists, especially within national forests, regarding fire and its impacts and influences on native and nonnative fish.<sup>1</sup>

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<sup>1</sup> Sestrich, Clint M., Thomas E. McMahon, Michael K. Young. 2011. Influence of Fire on Native and Nonnative Salmonid Populations and Habitat in a Western Montana Basin. Transactions of the American Fisheries Society 140:136-146, 2011.

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We recommend the following actions be included in the ecological change direction for the Gila plan revision. These comments include reference to upland vegetation, fire ecosystems, and landscape management.

- Implement native species habitat improvements. Trout Unlimited is strongly interested in all coldwater fisheries, but would like to highlight the existing populations for native trout recovery efforts in the GNF. TU's Strategic Plan identified conservation of southwest native fish in 2015 as a priority initiative. Trout Unlimited's Southwest Native Trout Strategy will provide additional focus and funding opportunities for recovery of native trout within the planning area. For decades, volunteers and staff have been working in partnership with the Forest Service and NMGFD and other partners to support the recovery of Gila trout in their original ranges across the state. Habitat on the GNF supplies a great opportunity to aid in the recovery of this rare trout species.

- Currently Gila trout occur

primarily in the Gila Wilderness Area and in a large complex on the upper west fork of the Gila River (see Figure 1). Some of these waters include Whiskey Creek, Cub Creek, Lower White Creek, Lower Langstroth Creek, Lower Trail/Rawmeat Creek, Willow Creek, and Turkey Creek.

- **Conservation Watershed Networks.** The GNF can indirectly manage its watersheds better resulting in a stronger influence on the landscape, its soils, watershed, riparian ecosystems and aquatic habitat. By identifying priority watersheds which provide significant and landscape influence TU believes stronger approaches for management actions can be developed. We support utilizing the concept of a conservation watershed network for native and wild fish, something other forests have been working on with success.

- A recently introduced tool used in other Forest Plan revision processes for a forest wide analysis is the *Conservation Watershed Network* approach to managing fish habitat. A *Conservation Watershed Network* is a collection of watersheds where management emphasizes habitat conservation and restoration to support fish and other aquatic species. The goal of the network is to sustain the integrity of key aquatic habitats to maintain long-term persistence of aquatic species. Designation of *Conservation Watershed Networks*, which should include watersheds that are already in good condition or could be restored to good condition, are expected to protect fish and help maintain healthy watersheds and river systems. Selection criteria for inclusion should help identify those watersheds that have the capability to be more resilient to ecological change and disturbance induced by climate change.

- For example, watersheds containing unaltered riparian vegetation will tend to protect

streambank integrity and moderate the effects of high stream flows. Rivers with high connectivity and access to their flood-plains will experience moderated floods when compared to channelized and disconnected stream systems. Wetlands with intact natural processes slowly release stored water during summer dry periods, whereas impaired wetlands are likely less effective retaining and releasing water over the season.

- For all of these reasons, *Conservation Watershed Networks* represent the best long-term conservation strategy for native and wild fishes and their habitats. Applied to the GNF, we believe that this type of multi-scale analysis and corresponding management directives would be an outstanding way to accomplish a host of forest-wide goals while still allowing flexibility and adaptive management on the ground and at the project level. This fish-specific outlook is especially practical on the GNF because of the designated protections in the many of the forest's headwaters.

➤ *Considerations for management of all Priority Watersheds.* All drainages impact downstream and subsequent cumulative effects are greater moving down a watershed. Forest restoration treatments should be watershed wide and landscape scale, the impacts from large scale fires in the GNF require consideration for long-term restoration. We support the Forest's efforts to actively engage in this restoration.

- We suggest a careful review of hydrologic management across the GNF. It should include an evaluation of suitability, stream condition mapping and defining best management practices.
- Reevaluate future threats and past impacts to individual watersheds, such as mining, energy development, overgrazing, timber harvest, etc.-- and create a management plan accordingly.
- Develop appropriate and strong riparian buffer protections and stipulations that mirror other native trout buffers currently being applied on other national forests with imperiled trout streams. Inventory species of conservation concern within watersheds.

➤ *Riparian Stream and Stream Channel Restoration and Stream Habitat Restoration.* Trout Unlimited appreciates the recognition that close to 61 percent of the GNF watersheds are Functioning at Risk or Impaired Function. Understanding why and what actions need to be taken will help to promote riparian ecosystem stability. We agree that restoration is needed to restore watershed and stream function, but suggest that both improvements to current conditions and increasing overall resiliency are of equal merit when evaluating potential future impacts to the watersheds of the GNF. Again, we stress the need for identification of overall watershed condition prior to specific treatment decisions for mechanical and fire forest treatments. We applaud the Forest's direction to emphasize soft infrastructure rather than structural.

- To best accomplish restoration of streams and drainages, we suggest examples of non-structural treatments be added with the other possible treatments listed, to a "toolbox" of approved Design Features, while still allowing for adaptive and creative solutions for situational prescriptions.
- We support all aspects of management approaches identified in the Final Need for Change document with respect to water protection efforts.
- We recommend expanding on relationships with users who are dependent on the GNF's water sources and its extended impact on vegetation resources.

➤ *Protection of Big Game Habitat.* Conservation of big game habitat means looking at the big picture. Landscape level movement, high quality waters, connected landscapes; outstanding habitat conditions, intact watersheds and appropriate access all play a part. Our vision looks at the big picture view and asks for a practical management strategy on the GNF.

- Mule deer, bighorn sheep, pronghorn antelope, and elk are the big game species that occur on the GNF. Providing continued optimal big game habitat conditions that ultimately result in providing quality hunting experiences for the sportsmen should be a strong management objective for the GNF seasonal closures for motorized trail travel to protect big game security.

- Road closures where appropriate due to known impacts of roads on elk and mule deer.
- Area closures in concentrated areas of severe winter range to protect populations ability to survive winter conditions.
- Implementation of timing restrictions on energy development using the latest science reviews from areas such as Wyoming and Colorado which have experienced significant impacts to big game populations and decreased hunting opportunities due to poorly planned and stipulated management actions.
- To provide for connectivity throughout the forest and the Greater Gila Landscape, we encourage the Forest Service to work with partners including the New Mexico Natural Heritage Program, New Mexico Department of Game & Fish to identify wildlife movement zones, similar to what has been done for the Upper Rio Grande Landscape.<sup>2</sup> The agency also should evaluate how well potential recommended wilderness units and other management alternatives would contribute to a more robust wildlands network and affect wildlife movement, landscape permeability, and related aspects of climate adaptation, making sure to consider direct, indirect, and cumulative impacts within the forest and the greater region.
- Carefully evaluate and manage over the snow travel to minimize impacts to wildlife utilizing winter range.

**4. Fire Management.** We encourage the Gila to incorporate a zone approach into the revised plan and EIS alternatives. Other forests revising their plans under the 2012 planning rule are taking a similar approach, including the Rio Grande's recent proposed. The basic concept is that there are parts of the forest where managing wildfire to meet resource objectives is less constrained and other parts where natural resources and communities are at higher risk, where fuel reduction efforts should be targeted. These zones should be mapped as part of the revised plan and EIS alternatives, using the location of the WUI and designating zones outwardly from there. We encourage the Gila to continue to use wildfire to meet resource objectives in the revised plan and EIS alternatives, including in wilderness, Roadless areas, and the vast areas between communities and wilderness that benefit from wildfire under less-than-extreme conditions.

**5. Designated Areas.** The planning rule requires the Gila National Forest to determine whether, where, and how to establish (or recommend for establishment) conservation areas as part of the plan revision. These types of conservation areas include, but are not limited to, lands recommended for wilderness designation, eligible Wild and Scenic rivers, and other designated areas.

**6. Wilderness or Backcountry management areas.** The Gila National Forest has 3 major wilderness areas with over 800,000 acres of designated lands. It also has over 733,800 acres of designated Roadless lands. We recommend the following 4 areas be considered for Wilderness or other Backcountry designations that protected its primitive characteristics.

- Mogollon Box – nearly 14000 acres on the Silver City Ranger District
- Gila Middle Box – Approximately 31,000 acres on the Silver City Ranger District
- Lower San Francisco River Box – Approximately 39,000 acres on the Glenwood District
- Frisco Canyon – Approximately 74,000 acres on the Reserve District

**7. Wild and Scenic Rivers.** Two river segments on the Gila and San Francisco River have previously been identified as eligible for Wild and Scenic River classification. We recommend that these segments be carefully evaluated for recommended classification.

**8. Social Cultural and Economic Changes.** As the popularity of the GNF continues to grow from its diverse array of outdoor opportunities, a stronger and more collaborative approach needs to be implemented for the management of recreation activities.

- With almost 2,000 miles of trails in the Forest, management and enforcement issues are challenging especially with limited funding. We suggest implementing partnerships for trail

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<sup>2</sup> See Appendix 36 (New Mexico Natural Heritage Program report) and discussion in Section 219.7 above.

maintenance and strong communication outreach regarding reasons behind any trail closures or uses, and promotion.

- For Designated Areas, improve conditions on the numerous Inventoried Roadless Areas (IRAs), with consideration of identifying IRAs that may be worthy of wilderness designation. This may help distribute the heavy use on the Gila Wilderness Area by outfitter/guides and distribute use to other equally high value areas.

**9. Energy and Minerals.** As the United States increases its exploration and development of energy and mineral resources impacts to public landscapes will rise. We recommend that the GNF designate suitable areas for mineral and energy development. We suggest the Forest complete an oil and gas leasing suitability analysis and identify areas that are low, medium and high resource potential for the development of oil, gas, helium, geothermal and hardrock minerals.

## Conclusion

Overall, TU and the sportsmen and sportswomen we represent, are concerned with watershed health and wildlife habitat above all else. We appreciate the work of the Forest Service in managing the GNF and working with the public in such an exemplary fashion, as this benefits all of us as public users. We are thankful for the opportunity to comment on the Plan Revision process.

This revision process provides substantial opportunities to manage for healthy watersheds and fish and wildlife habitat in new and creative ways, specifically through the creation of a *Conservation Watershed Network*. We also hope the Forest considers and includes our recommend Sportsmen's Emphasis Areas which can provide significant collaborative engagements and support for quality habitat landscapes.

In a testimony to the Senate Committee on Agriculture, Nutrition, and Forestry, TU's CEO Chris Wood reflected that, "The guiding principle of the federal government's action regarding wildfire—and all other management activities— should be to ensure the long-term ecological health of the lands and waters upon which we all depend."<sup>3</sup> The GNF Revision Plan has an opportunity to accomplish a broad set of goals and directives. Trout Unlimited applauds the vision of these projects, and hopes our contributions to that vision are helpful.

Though we believe that forest restoration projects on the GNF are necessary we seek to insure that, more importance is placed on the hydrology and aquatic ecosystems on this forest. You cannot have a healthy watershed without the cumulative health of the uplands and the waterways. Chris Wood also reminded the Senate Committee that Forest Service road and fish habitat projects have dropped from 250 to 40 in recent years, and that in 2015 alone watershed restoration projects were reduced by 35 percent. Trout Unlimited hopes this planning process will enable all of us to work toward a reversal of that trend.

As we have offered in our scoping comments, we intend to work with other sportsmen/wildlife organizations to develop a sportsmen "vision" for the new GNF plan that protects backcountry lands, provides reasonable access, restores streams and native trout population, protects watersheds important for all species on the GNF, enhances fish and wildlife habitat, and provides and protects functioning wildlife corridors.

We appreciate the opportunity to participate in the forest plan revision process and would like to work cooperatively with the Forest Service on the issues discussed above, and to help achieve ecologically sustainable, fiscally realistic, and enforceable management of forest resources for the future.

Please contact me should you have any questions regarding what we have proposed in these comments.

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<sup>3</sup> <http://www.tu.org/blog-posts/chris-woods-full-testimony-on-fire-borrowing>.



Sincerely,

A handwritten signature in black ink on a light yellow background. The signature is cursive and appears to read 'Nate Rees'.

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