

# Response to Comments

## Fall Creek and Woods Lake Colorado River Cutthroat Trout Restoration Project

Norwood Ranger District  
Grand Mesa, Uncompahgre, and Gunnison National Forests

April 2008

Fall Creek and Woods Lake Colorado River Cutthroat Trout Restoration Project

Public Comments

Commenter Number	Commenter Name
1	David Stephenson
2	Leon Moyer
3	Peter Ramsey
4	Alan Bradbury
5	Hillary White, Sheep Mt. Alliance
6	Chris Bowles
7	Werner Catsmen
8	David Allen, Telluride Outside
9	Bob Sheppard, RIGS Flyshop
10	Levi Tatum
11	Kevin Broderick
12	Todd Baize
13	Town of Norwood
14	Howard Hughes
15	Werner Catsmen
16	Hillary White, Sheep Mt. Alliance

**Water Resources**

- ♦ **WR-1** I have concerns about the use of “chemicals” to eradicate fish. Is there any chance that the chemical could reach the San Miguel River? (5,7,8,9,12, and 15)

Response:

Rotenone has a long history of use and has been used safely and successfully in nearly 60 years in fisheries management. Fisheries management uses include eradication of pest fishes, quantifying populations, food web manipulation, controlling fish diseases, and restoring water bodies for threatened species. Rotenone is considered one of the most environmentally benign toxicants available for fisheries management.

The Environmental Assessment (EA) on page 13 has disclosed that water quantity would not be permanently affected by the proposal. The effects on water quality from the application of piscicides and potassium permanganate would be temporary and would become undetectable after detoxification. By the time source waters reach municipal locations, adequate dilution and natural detoxification would have occurred. Supplemental detoxification with potassium permanganate hastens this chemical process, and would virtually eliminate the possibility of acute or chronic exposure by humans to harmful levels of the chemicals. Additionally, “sentinel” fish would be used below Woods Lake as an early detection tool to determine if rotenone is affecting downstream fish and aquatic life that is not targeted by the proposed treatment.

- ♦ **WR-2** I have concerns about use of “canaries” (sentinel fish) to determine if rotenone has been neutralized. Would it be better to monitor concentration of rotenone itself? (7)

Response:

“Sentinel” fish would be used below Woods Lake as an early detection tool to determine if rotenone is affecting downstream fish and aquatic life that is not targeted by the proposed treatment. Historically, this has been used as a very useful, timely, and cost effective way to determine if non-targeted populations of fish below the project are being affected by rotenone. Monitoring water quality in traditional ways would allow too much time to pass before knowing if rotenone is being de-toxified by the application of potassium permanganate. Use of the sentinel fish allows for project managers to quickly adjust the levels of potassium permanganate and minimize potential impacts to non-targeted reaches of Fall Creek.

**Threatened, Endangered, and Sensitive Species**

- ♦ **TES-1** What happens if the Colorado River cutthroat trout (CRCT) becomes Federally listed under ESA? (9)

Response:

The Purposed and Need on page 2 of the EA states that one objective of the project is to “reduce the likelihood of the species becoming Federally-listed under the ESA.” However, if the CRCT are federally listed, the project would benefit the recovery of the species by increasing the distribution of CRCT by 5 miles of stream and 17 acres of lake. Any new management and regulations are out of the scope of this project since management of the species would then be regulated by the U.S. Fish and Wildlife Service.

**Wetlands, Riparian, and Aquatic Habitat and Biota**

- ♦ **WRAHB-1** I have concerns about the possible effects of rotenone on amphibians? (8,10, and 16)

Response:

Effects to amphibians have been disclosed in the EA on page18, and page 23. In summary, rotenone is expected to cause to mortality to amphibians, particularly juvenile life-history stages of frogs, toads, and salamanders. However, eradication and long-term effects are not expected to occur, and amphibian populations are expected to return to following the completion of the project.

- ♦ **WRAHB-2** I have concerns about the possible effects of rotenone on aquatic insects? (8)

Response:

Effects to aquatic insects have been disclosed in the EA on page 23. In summary, rotenone is expected to have short-term effects to overall aquatic insect abundances. However, aquatic insect abundance is expected to return to baseline conditions with 1-2 years of treatment.

- ♦ **WRAHB-3** I have concerns over the global decline in amphibians? (16)

Response:

Global declines in amphibians are out of the scope of this project.

- ♦ **WRAHB-4** Has CDOW and Forest Service addressed the aquatic plants build up in the lake? Will this affect recovery efforts? (7)

Response:

The aquatic plant density in Woods Lake is not expected to affect the project success.

**Miscellaneous Responses**

- ♦ **MISC-1** Can non-native trout in Woods Lake and Fall Creek be eliminated or reduced through other methods of fish removal (1,6,7, and 15)

Response:

This topic was discussed at the April 10, 2008 meeting and is discussed in the EA on page 10. In summary, full eradication of non-native trout are needed to securely re-established CRCT in the project area. Other methods of non-native trout removal such as over-fishing and extensive electrofishing would not accomplish the complete eradication of non-native trout in the project area.

- ♦ **MISC-2** I do not understand the intentional killing of fish in a body of water to establish “native fish. For the CDOW to get involved in chemical sterilization of any body of water sets a dangerous precedent for not just game fish, but all game fish. I do not approve the proposed use of rotenone in Woods Lake and upstream tributaries and ask that you not proceed with this project. (1, 2, and 6)

Response:

Thank you for your comment.

- ♦ **MISC-3** How many places does DOW want to have as a re-established place for the native cutthroat trout? I think about 6 or 8 should be sufficient to keep the species viable, (2)

Response:

The viability of CRCT remains a concern within its historic range primarily due to the introduction of non-native fish.

- ♦ **MISC-4** I support the project (3,5,8, 11, 12, 15, and 16 )

Response:

Thank you for your comment

- ♦ **MISC-5** What will the fishing regulations be after the project is completed (9 )

Response:

Fishing regulations are set by the CDOW. Fishing regulations are out of the scope of this project.

- ♦ **MISC-6** Woods Lake is a special place for families...good fishing and easy access. Concerned that the re-introduction of CRCT is the “fad of the day” because he does not trust CDOW. (6 )

Response:

Thank you for your comment

- ♦ **MISC-7** Questions if CDOW knows what they are doing in regards to cutthroat management (referred to recent issue concerning genetic status of Colorado River cutthroat trout vs. greenback cutthroat trout). (6)

Response:

Thank you for your comment.

- ♦ **MISC-8** I wish to keep the Hughes Ditch flowing at the project proceeds. (14)

Response:

The CDOW will work with Howard Hughes, President of the J & M Hughes Ditch Company to ensure that impacts to the conveyance of water from Fall Creek down the Hughes Ditch would be kept to a minimum.

- ♦ **MISC-9** Will stocked CRCT be free of whirling disease. (15)

Response:

Stocking policies and stocking management are set by the CDOW. Stocking whirling disease positive CRCT would not meet be consistent with CRCT recovery efforts, and is not being proposed by CDOW.

- ♦ **MISC-10** What this venture will cost? Our country is facing a deep economic crisis and I'm not sure that this project represents a very fair use of our resources. (15)

Response:

Thank you for your comment.

- ♦ **MISC-11** Concerned about the location of the proposal, and that the easy access to the site may impact the long-term success of the project. Users of the area may introduce bait, non-native fish, or other contamination to the project area. Feels that sabotage (illegal re-introduction of non-native trout) is inevitable given the easy access to the site. Asks for increased official presence to dissuade any action of sabotage. (16)

Response:

Thank you for your comment.

- ♦ **MISC-12** Would like to see a long-term education plan to increase public awareness and support for project (16)

Response:

Thank you for your comment. The Forest Service and CDOW plan on taking steps to educate and gain support for this project and others like them.