Audubon | ROCKIES

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Via e-mail cneelan@fs.fed.us, cneelan@usda.gov

Ashley National Forest - Forest Plan Revision #49606
Attn: Cathleen Neelan/Plan Revision Team
Ashley National Forest All Units
355 North Vernal Avenue
Vernal, Utah 84078–1703

Re: Comments on the Ashley National Forest Proposal to Revise the Land Management Plan and Evaluation of Potential Wilderness Inventory Areas

Dear Ms. Neelan:

Please accept these comments on behalf of the National Audubon Society/Audubon Rockies to comment on the Ashley National Forest's Proposal to Revise the Land Management Plan ("Proposed Plan") and Evaluation of Potential Wilderness Inventory Areas ("Wilderness Evaluations"). We appreciate the chance to provide input into this process and are focused primarily on the importance of the Forest Service taking this opportunity to protect birds and the broader ecosystem, including through applying correct wilderness criteria, wilderness suitability determinations, adequate management of recommended wilderness areas, and other special management designations.

The National Audubon Society's mission is to protect birds and the places they need to thrive today and tomorrow. The National Audubon Society is committed to protecting birds and their habitats throughout the Americas using science, advocacy, education and on-the-ground conservation. Audubon works proactively with all stakeholders, to ensure impacts to important avian habitats are avoided or minimized to the greatest extent possible. Audubon Rockies is a regional office of National Audubon Society, serving Utah, Wyoming, and Colorado. Audubon Rockies works with partners and the four independent Audubon chapters located across Utah. Audubon members, including Chapter members, enjoy recreating on federally-managed lands, including the Ashley National Forest and other federally-managed lands in Utah. These lands represent a legacy to pass on to future generations.

Birds form part of healthy ecosystems throughout the United States by playing critical roles in pollination, insect control, forest generation, seed dispersal, carrion scavenging, and many other ecosystem services we rely on.[1] Additionally, birds bring joy to people and benefit local economies. In 2011, birdwatching-related industries drove $41 billion in expenditures and $107 billion in total industry output nationally.[2] In Utah alone, there are more than 410,000 total birders.[3]

As discussed in our new, comprehensive report, *Survival By Degrees:* "the future of birds is at risk with alarming losses of biodiversity occurring worldwide. Global extinction rates are now 100 times higher than background rates. Climate change exacerbates the global biodiversity crisis, with an anticipated rate of

[1] https://www.audubon.org/sites/default/files/briefs_ut_final.pdf at 1.
[2] *Id.*
[3] *Id.*

change 20 times faster in the next century than during the past two million years."[4] Associated risks for birds include rising temperatures and shifting weather patterns, which threaten birds' ability to find food and reproduce, and which over time impact local and ultimately continent-wide populations.[5] In extreme cases, where birds cannot find the conditions they need to survive and raise their young, entire species may go extinct.[6]

Risks to bird populations in the Western United States associated with climate change include rising temperatures in the spring, which endanger young birds in the nest, and the increasing frequency of wildfires, which can incinerate, and in extreme circumstances, prevent recovery of habitat.[7]

Utah's birds will be affected by these risks. The state is projected to experience decreased water availability and greater fire risk in the future,[8] which translates to a diminished range of suitable bird habitat. According to our recent research, "49% of Utah's 251 bird species are vulnerable to climate change across seasons,"[9] and this vulnerability is expected to increase under higher climate warming scenarios as many species struggle to adapt. For example, the summer habitat of 108 of Utah's bird species is expected to decrease if temperature rise reaches 3 degrees Celsius, while a rise of 1.5 degrees Celsius would reduce the number of affected species to 72.[10]

Utah's most vulnerable bird species are concentrated in the Western Forests and Boreal Forests habitat groups, which include the Ashley National Forest.[11] The Ashley National Forest is home to 18 species that the USFWS has identified in its Birds of Conservation Concern list as those meriting consideration during agency planning, based on the USFWS's Information for Planning and Consultation tool.[12] Of those 18 species, six species are also listed as state species of greatest conservation need in the 2015-2025 Utah Wildlife Action Plan: Black Rosy Finch, Black Swift, Burrowing Owl, Lewis's Woodpecker, Golden Eagle and Olive-Sided Flycatcher.[13] Each of these at-risk species is found in distributions that overlap with at least one of the inventoried wilderness areas in the forest and/or in inventoried roadless areas.[14] However, in the wilderness evaluations at issue, the Forest Service inexplicably considered only one of the listed species, the Black Rosy-finch.[15] It is concerning that in its evaluation of the forest's ecological values, the Forest Service did not consider the 17 other rare and vulnerable bird species, including one of Utah's most threatened birds in a 3-degree temperature rise scenario- the Brewer's sparrow.[16]. The limitation of the Forest Service impact analysis to just one bird species may prevent sufficient consideration of the interests of and impacts on avian wildlife that would result from the pending action. At the very least, if the Forest Service ultimately chooses to limit its analysis to a single species, then under NEPA, the agency must explain why it is reasonable to do so. Moreover, the agency should consider conducting a more thorough analysis of the

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[4] https://www.audubon.org/climate/survivalbydegrees/state/us/ut
[5] *Id*.
[6] *Id*.
[7] https://www.audubon.org/field-guide/bird/sagebrush-sparrow#bird-climate-vulnerability
[8] https://www.audubon.org/climate/survivalbydegrees/state/us/ut
[9] https://www.audubon.org/sites/default/files/briefs_ut_final.pdf at 4.
[10] *Id*.
[11] *Id*.
[12] Species include the Black Rosy-finch, Black Swift, Brewer's Sparrow, Burrowing Owl, Cassin's Finch, Clark's Grebe, Golden Eagle, Grace's Warbler, Lesser Yellowlegs, Lewis's Woodpecker, Long-eared Owl, Marbled Godwit, Olive- sided Flycatcher, Pinyon Jay, Rufous Hummingbird, Virginia's Warbler, Willet, and Willow Flycatcher
[13] https://wildlife.utah.gov/discover/wildlife-action-plan.html
[14] *Id*.
[15] *Id*.
[16] https://www.audubon.org/sites/default/files/briefs_ut_final.pdf at 2.

impacts on the 17 species that were excluded from the initial plan as part of its evaluation of ecological landscape features for inventorying wilderness criteria as part of ultimately identifying lands that will be managed as recommended wilderness.

Without substantial climate change mitigation, average temperatures across Utah during the warmest months are expected to increase approximately 6.5 degrees Celsius from 2010 to the end of the century.[17] *See* impacts on Utah birds' summer habitat above. In addition, while average annual precipitation is expected to increase over the same period, available moisture is expected to decrease by 26% due to increases in evapotranspiration.[18] Relatedly, the distribution of vegetation biomes, which are critical for birds and the ecosystems that they depend on, is expected to change, with the most noticeable shift being the expansion of Desert Scrub biomes from 49% to 76% of the state's area as forests and other biomes are displaced.[19]

In light of these anticipated changes and the additional stresses that they will introduce to avian species within the Ashley National Forest, the Forest Service should take action to mitigate those effects and improve ecological outcomes by sequestering carbon through proper resource management. To this end, the Forest Service should ensure continued protections within and promote restoration of its national forests, which can be used as resources to combat climate change. Broadly, forests serve as natural carbon sinks that absorb and store carbon from the air, reducing the volume of greenhouse gases in the atmosphere that contribute to global climate change and its connected risks for birds, which can be observed on a local scale (i.e. the Ashley National Forest). More directly, forests provide habitat that birds rely on to feed, breed, and raise their young. The Forest Service should prioritize these interests in its decision making process.

Specifically, the Forest Service should ensure that it carefully identifies lands that meet wilderness criteria and are suitable for management as recommended wilderness, and ultimately maximizes such designations. In addition, for inventoried roadless areas that are not managed as recommended wilderness, we recommend that the Forest Service evaluate management practices that will provide additional protections for birds and other wildlife, such as limiting use of motorized vehicles and placement of other infrastructure.

Areas with wilderness characteristics and roadless areas serve important roles for birds and other wildlife by providing some of the last remaining prime, core habitat with low levels of human disturbance. Maintaining these areas in the Ashley National Forest through protective management is in the best interest of birds and other wildlife, including the 18 species of conservation concern discussed above. In short, it is more important than ever that the Forest Service' analysis of areas that may be managed as recommended wilderness and roadless areas consider their importance to birds in the context of climate change and other risks.

It is also important that the agency's plan recommend additional Research Natural Areas ("RNAs"), which are selected based on their outstanding biological integrity and opportunities for research and education. RNAs can include areas that provide quality habitat for birds and other wildlife comparable to habitat found in areas managed as recommended wilderness or roadless areas, and their designations as such may provide these wildlife populations with an added measure of resilience against impending climate and anthropogenic stressors.

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[17] *Id.* at 1.
[18] *Id.*
[19] *Id.*

Under the Forest Service Manual, "Forest plans shall include analysis of, and recommendations for, the establishment of proposed [RNAs]." However, the proposed plan here did not recommend establishing any additional RNAs. In particular, we recommend that the Forest Service consider designating the Sims Peak Potholes North area ("North Potholes) as a new RNA or extending the current Sims Peak Pothole RNA ("Potholes") to include the area. The North Potholes area shares the same ecologic features that justify the designation of the existing Potholes RNA as such, namely kettle lakes and ponds, bogs, marshes, and wet meadows, supplying valuable wetland ecosystems.

These glacial depressions, or "potholes," within the Ashley National Forest, and prairie potholes generally, provide some of the most productive habitat on earth for waterfowl.[20] While some maintain a relatively permanent state as ponds or marshes, others are filled seasonally with snowmelt and rain.[21] Potholes serve many important ecosystem functions for birds and other wildlife, including supporting the needs of migratory waterfowl to feed and breed, and absorbing waters to prevent flooding and loss of moisture from these habitats.[22] These habitats are also sensitive to climate variability and human development, which affects the behavior of wildlife that depend on them. For example, waterfowl are "adapted to exploit periodic shifts in wetland conditions and are known to migrate past drought-stricken areas to settle in landscapes with an abundance of ponded wetlands."[23]

Based on this context, it is important that the Forest Service consider increasing protections for wetland ecosystems within the Ashley National Forest. To begin, we recommend that the Forest Service consider moving toward a designation of the North Potholes area as an RNA. This action would help to maintain Utah's biodiverse bird population and thereby contribute to the balance of ecosystems that rely on birds in the region.

Overall, we hope to see the Forest Service apply the correct criteria to ensure all qualifying lands are identified as meeting wilderness criteria and, ultimately, managed as recommended wilderness to provide the maximum benefit for birds. In addition, areas that are not evaluated for wilderness potential or found suitable should be protected through other appropriate administration designations or creation of a conservation-oriented management area. We look forward to working with the Forest Service as the Ashley National Forest Plan revision process continues and to seeing our comments addressed. Please do not hesitate to contact us if you have questions.

Sincerely,

Alison Holloran
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Vice President, National Audubon Society
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cc: John Bellmon (former President), Corgie Corkery (President) – Utah Audubon Council
Marcelle Shoop - Director, Saline Lakes Program, National Audubon Society
Nada Culver - Vice President, Public Lands and Senior Policy Counsel, National Audubon Society

[20] https://academic.oup.com/bioscience/article/55/10/863/274395:
[21] https://www.epa.gov/wetlands/prairie-potholes
[22] *Id.; see also* https://www.fws.gov/wetlands/documents/Status-and-Trends-of-Prairie-Wetlands-in-the-United-States-1997-to-2009.pdf
[23] https://academic.oup.com/bioscience/article/55/10/863/274395: