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Uinta-Wasatch-Cache National Forest

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10.10.2023

Dear Mr. Jauregui,

Thank you for this opportunity to comment on the Strawberry Ridge Vegetation Management Draft Environmental Assessment (the EA). Western Watersheds Project is a nonprofit environmental conservation group with nearly 11,000 followers and field offices in Idaho, Montana, Wyoming, Arizona, Utah, Nevada, Washington, and California. WWP works to influence and improve public lands management throughout the West, including our ecological, biological, cultural, historic, archeological, and scenic resources, wilderness values, Roadless Areas, Wilderness Study Areas and designated Wilderness. Western Watersheds Project staff and members use and enjoy the public lands, including the Forest Service lands on Strawberry Ridge, for recreational, scientific, and educational opportunities.

WWP recognizes the threat of climate change on the Forest resources in the project area and the need to address resource concerns arising from increased temperatures and reduced (or altered) patterns of precipitation. However, we also have some concerns about the project design. We believe that this project and the environmental analysis supporting it still require substantive modifications, which we discuss below.

## I. THE EA FAILS TO DISCLOSE THE PROJECT’S SITE-SPECIFIC DIRECT AND INDIRECT IMPACTS, VIOLATING THE NATIONAL ENVIRONMENTAL POLICY ACT.

NEPA permits an agency to forecast broad cumulative impacts of related actions in a

programmatic NEPA document before it knows the actual direct and indirect effects of implementation decisions on specific project areas. See, e.g., Nat’l Wildlife Fed’n v. Appalachian Reg’l Comm’n, 677 F.2d 883, 888 (D.C. Cir. 1981) (examining programmatic EIS and requirement to perform site-specific NEPA analysis); New Mexico ex rel. Richardson, 565 F.3d at 717-18. However, once the site-specific effects of a proposed action become reasonably foreseeable, an agency must analyze the direct and indirect effects of the proposed action. New Mexico ex rel. Richardson, 565 F.3d at 717-18. This analysis must take place in a NEPA

document. See S. Utah Wilderness Alliance v. Norton, 457 F. Supp. 2d 1253, 1264 (D. Utah 2006), aff’d in part, appeal dismissed in part on other grounds sub nom. S. Utah Wilderness Alliance v. Kempthorne, 525 F.3d 966 (10th Cir. 2008).

Where an agency seeks to authorize site-specific actions through an environmental assessment — that is, where a NEPA analysis represents the agency’s “last word” on environmental impacts before ground-level implementation—the required level of analysis is stringent. See, e.g., Friends of Yosemite Valley v. Norton, 348 F.3d 789, 800-01 (9th Cir. 2003). At the “implementation stage,” the NEPA review must be more tailored and detailed because the agency is confronting “individual site specific projects.” California v. Block, 690 F.2d 753 (9th Cir. 1982); Forest Ecology Ctr., Inc. v. U.S. Forest Serv., 192 F.3d 922, 923 n.2 (9th Cir. 1999). Indeed, federal courts have faulted the Forest Service for failing to provide site-specific information in a landscape level analysis:

“This paltry information does not allow the public to determine where the range for moose is located, whether the areas open to snowmobile use will affect that range, or whether the Forest Service considered alternatives that would avoid adverse impacts on moose and other big game wildlife. In other words, the EIS does not provide the information necessary to determine how specific land should be allocated to protect particular habitat important to the moose and other big game wildlife. Because the Forest Service did not make the relevant information available, the public was limited to two-dimensional advocacy—interested persons could argue only for the allocation of more or less land for snowmobile use, but not for the protection of particular areas. As a result, the Forest Service effectively stymied the public’s ability to challenge agency action.” WildEarth Guardians v. Montana Snowmobile Ass’n, 790 F.3d 920, 927 (9th Cir. 2015).

When the Forest Service fails to conduct that site-specific analysis, the agency “does not allow the public to ‘play a role in both the decision-making process and the implementation of that decision.’” Id. at 928 (quoting Methow Valley Citizens Council, 490 U.S. at 349). “Although the agency does have discretion to define the scope of its actions, . . . such discretion does not allow the agency to determine the specificity required by NEPA.” City of Tenakee Springs v. Block, 778 F.2d 1402, 1407 (citing California v. Block, 690 F.2d 753, 765 (9th Cir. 1982)). In State of Cal. v. Block, for example, the decision concerned 62 million acres of National Forest land, and

the Ninth Circuit still required an analysis of “[t]he site-specific impact of this decisive allocative decision.” California v. Block, 690 F.2d 753, 763 (9th Cir. 1982). In short, NEPA’s procedural safeguards are designed to guarantee that the public receives accurate site-specific information regarding the impacts of an agency’s project-level decision before the agency approves the decision.

Analyzing and disclosing site-specific impacts is critical because where (and when and how) activities occur on a landscape strongly determines that nature of the impact. As the Tenth Circuit Court of Appeals has explained, the actual “location of development greatly influences the likelihood and extent of habitat preservation. Disturbances on the same total surface area may produce wildly different impacts on plants and wildlife depending on the amount of contiguous habitat between them.” New Mexico ex rel. Richardson, 565 F.3d at 706. The Court used the

example of “building a dirt road along the edge of an ecosystem” and “building a four-lane highway straight down the middle” to explain how those activities may have similar types of impacts, but the extent of those impacts – in particular on habitat disturbance – is different. Id.at 707. Indeed, “location, not merely total surface disturbance, affects habitat fragmentation,” id., and therefore location data is critical to the site-specific analysis NEPA requires. Merely disclosing the existence of particular geographic or biological features is inadequate—agencies must discuss their importance and substantiate their findings as to the impacts. Or. Natural Res.

Council Fund v. Goodman, 505 F.3d 884, 892 (9th Cir. 2007). Objection regs 36 CFR 218, subparts A and B.

## II. The EA Fails to Adequately Analyze Impacts on Inventoried Roadless Areas

A. The Roadless Rule

The Roadless Rule provides that, in general, “[t]imber may not be cut, sold, or removed in inventoried roadless areas of the National Forest System.” 36 C.F.R. § 294.13(a). One exception to this general provision states that timber may be cut, sold, or removed in inventoried roadless areas if the Responsible Official determines that one of the following circumstances exists.

The cutting, sale, or removal of timber in these areas is expected to be infrequent.

(1) The cutting, sale, or removal of generally small diameter timber is needed for one of the following purposes and will maintain or improve one or more of the roadless area characteristics as defined in § 294.11.

(i) To improve threatened, endangered, proposed, or sensitive species habitat; or

(ii) To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period.

36 C.F.R. § 294.13(b)(1) (emphasis added).

The cutting, sale, or removal of trees pursuant to 294.13(b)(1) must be clearly shown through project level analysis to contribute to the ecological objectives described. Such management activities are expected to be rare and to focus on small diameter trees. Id. at 3258 (emphasis added). See also Los Padres ForestWatch v. United States Forest Serv., 25 F.4th 649, 656-57 (9th Cir. 2022) (quoting same).

In adopting the Roadless Rule, the Forest Service also anticipated that logging or other tree removal in IRAs under this specific exception would only occur following a project-level NEPA analysis that evaluated stand-specific conditions.

B. The Forest Service Fails to Ensure that Logging Will Be Limited to “Generally Small Diameter Timber.”

The EA fails to acknowledge the Roadless Rule’s mandate that tree removal in IRAs be limited to “generally small diameter timber.” Neither the EA nor the Forest’s supporting documents define what constitutes a “small diameter” tree for any of the stands within the project area, let alone within individual roadless areas. Nor does the Forest Service explain how the project’s provisions and design features will limit logging to small trees, whatever those might be. As noted above, the preamble to the Rule states:

“determinations of what constitutes “generally small diameter timber” will consider how the cutting or removal of various size classes of trees would affect the potential for future development of the stand, and the characteristics and interrelationships of plant and animal communities associated with the site and the overall landscape.

Forest Service, Roadless Area Conservation Rule, 66 Fed. Reg. 3244, 3258 (Jan. 12, 2001) (emphasis added). “

A federal appeals court decision demonstrates that a court would likely find this project violates the Roadless Rule. In Los Padres ForestWatch v. United States Forest Service, 25 F.4th 649 (9th Cir. 2022), the Forest Service approved the Tecuya Ridge logging project in a roadless area, setting a limit of logging trees less than 21 inches diameter at breast height (dbh), arguing that trees of such width constituted “generally small diameter timber.” 25 F.4th at 656-57. The court found that the Forest Service failed to support its conclusion that a 21” dbh tree constituted a “small diameter” tree, noting among other things that “the Forest Service did not attempt to articulate this explanation or, indeed, provide any information at all on the average dbh of the trees located within the … Project area.” Id. at 658. The court therefore found the agency violated the Roadless Rule and remanded the project back to the Forest Service for further explanation as to what constitutes a small diameter tree. Id. at 659.

The Forest Service must ensure that the Strawberry Ridge Project complies with the Roadless Rule’s mandate that cutting and tree removal may only occur where it involves “generally small diameter timber” by:

- defining what constitutes small diameter timber based on a stand-specific analysis of areas proposed for treatment in each of the 13 roadless areas;

- generally limiting tree removal and cutting to trees meeting the definition of small diameter;

- demonstrating whether and how stands proposed for logging are “overstocked” with small diameter trees; and

- explaining whether and how the agency’s treatments that allow removal of some old growth trees comply with the Roadless Rule.

B. The Forest Service Fails to Take a “Hard Look” at the Project’s Impacts to Roadless Area Characteristics.

The proposed action proposes cutting down a substantial amount of trees in the project area. The EA calls for mechanical vegetation removal on “approximately 1,119 acres of the Two Tom IRA, 39 acres of the Mapleton IRA, 1,236 acres of the Box Springs IRA, 1,410 acres of the Daniel’s IRA, 28 acres of the South Fork IRA, 194 acres of the Red Mountain IRA, 2,024 acres of the Wallsburg IRA, 897 acres of the Strawberry Ridge IRA, and 607 acres of the Pump Ridge IRA”. EA at 18. Thirty-five percent of the project area (7,554 acres) in Inventoried Roadless Area is slated for these intensive impacts.

Projects of this extent should be analyzed more thoroughly in subsequent NEPA documents and the Forest Service must disclose impacts to IRAs and roadless area characteristics. Any subsequently-prepared NEPA document should provide maps displaying roadless area boundaries overlaying plant and animal communities, soil types, wildlife habitat, and treatments proposed so that the public and decisionmaker can understand both the values of each individual IRA and the potential for proposed treatments to degrade or improve those values. The EA does not contain information describing the specific values and characteristics of individual roadless areas, let alone the specific treatments by specific stands, making the conclusions in the analysis arbitrary.

III. The EA Fails to Identify or Protect Old Growth or Mature Forests as Required by Executive Order 14072.

The importance of preserving mature forests in staving off the worst impacts of the climate crisis and the extinction crisis led President Biden on Earth Day in 2022 to issue Executive Order 14,072, “Strengthening the Nation’s Forests, Communities, and Local Economies.” E.O. 14,072, 81 Fed. Reg. 24851 (Apr. 27, 2022), available at <https://www.govinfo.gov/content/pkg/FR-2022-04-27/pdf/2022-09138.pdf>. That order notes:

“Globally, forests represent some of the most biodiverse parts of our planet and play an irreplaceable role in reaching net-zero greenhouse gas emissions. Terrestrial carbon sinks absorb around 30 percent of the carbon dioxide emitted by human activities each year. Here at home, America’s forests absorb more than 10 percent of annual United States economy-wide greenhouse gas emissions. Conserving old-growth and mature forests on Federal lands while supporting and advancing climate-smart forestry and sustainable forest products is critical to protecting these and other ecosystem services provided by those forests.”

E.O. 14,072, 81 Fed. Reg. at 24851 (emphasis added).

The Executive Order directs the Forest Service to “[c]onserv[e] old-growth and mature forests,” which the EA fails to address specifically. E.O. 14,072, 81 Fed. Reg. at 24851 (emphasis added). In any subsequently prepared NEPA document, the Forest Service must inventory both mature and old-growth trees and stands, and disclose the impacts of the project on mature trees and stands as well as old growth.

## IV. The EA Should More Adequately Address Protection and Restoration of Riparian Areas.

## The EA authorizes impacts in Riparian Habitat Conservation Areas (RHCAs) that have the potential for heavy impacts. The EA says it will adhere to mitigation measures and BMPs, *but only if such actions are practicable*. (*See, e.g.,* “Temporary road construction would be minimized to the greatest extent practicable. EA at 12.) This language gives the Forest a large loophole that undermines its commitment to mitigation measures. The public cannot be assured, then, that the impacts to riparian areas will indeed be mitigated.

There is no research showing the ecological benefits of prescribed burning of riparian areas. Stone et al. (2010) say that: “Regardless of the impetus for active management of riparian fuel profiles, ecological justification for these treatments has yet to be supported by empirical evidence…[and] there is limited published information available to managers on the necessity or ecological effects of fuel reduction treatments in riparian ecosystems.” [[1]](#footnote-1)

Minimizing soil disturbance, particularly in riparian areas, should be a goal. Riparian areas have alluvial soil, deposited from floods, that is generally more porous than upland soil. We oppose driving heavy machinery in the RHCAs because floodplain soil is vulnerable to compaction, which decreases infiltration capacity and the ability of that soil to store water. Heavy machinery causes soil displacement which makes it vulnerable to erosion. All of these impacts to soil make it harder for native vegetation to persist or to establish and therefore heavy machinery should not be used in riparian areas.

Altering or removing native vegetation in riparian areas should be avoided as much as possible because of the risks from disturbance. If some removal of upland species in riparian areas is ecologically beneficial, then hand-cutting should be the method used. If fire reduction is the goal, then cutting a few patches across the riparian area could serve as fire breaks. There is no need to remove all conifers from riparian areas. A functioning stream-riparian ecosystem will periodically flood the floodplain and damage, uproot or kill conifers naturally.

Recommendations:

* We recommend that no ignitions occur in riparian areas, and that riparian areas burn if/when upland ignitions reach riparian areas.
* There should be no mechanized treatment in riparian areas. Conifers encroaching into riparian areas can be accomplished by manual methods, which are much less damaging to riparian vegetation, soils, and stream function, and all the wildlife that depends on properly functioning condition.
* For riparian areas that are not functioning properly, it is imperative that they be rested from livestock grazing regardless of treatment prescription. We urge a stronger commitment to post-fire rest from livestock for riparian areas, which lasts more than the two years listed in design feature.
* Healthy riparian and stream ecosystems, including beaver ponds and wetlands, can serve as natural fire breaks. Efforts to restore beaver and their habitat can provide some of the same benefits of reducing the size of wildfires sought in this prescribed fire EA.
* The Forest should consider following the Dixie National Forest’s Prescribed Fire EA, which details the following best management practices:
1. “In general, no direct fire ignitions for broadcast burning would occur within 100 feet from streams, ponds, lakes, and wetlands.”
2. “No pile burning would occur within 100 feet of perennial and intermittent stream channels, spring, wetlands, lakes, and other waterbodies or within the extent of hydric vegetation, whichever is greater in the Aquatic Management Zone (AMZ).
3. “Except on permitted roads or trails where they already exist, or on designated stream crossings, tracked and wheeled equipment would not be operated within the Aquatic Management Zone (AMZ) of intermittent and perennial channels, streams, springs, wetlands and reservoirs.”

## V. The EA Does Not Adequately Analyze Impacts to the US Forest Service Region 4 Sensitive Boreal Toad

The Boreal toad is a US Forest Service Region 4 Sensitive Species and a Utah State Sensitive Species that has been declining for decades. The EA acknowledges the potential for impacts on this species from the project implementation, but the only mitigation measures it proposes is to minimize disturbance in known occupied boreal toad habitat during the active breeding season (4-5 weeks following snowmelt). This mitigation seems minimal, especially given the EA’s own analysis that “Direct effects to fisheries and amphibians would be reductions in ground and aerial cover in and adjacent to RHCAs, soil disturbance, temporary stream modifications for stream crossings, and localized aggradation or erosion of substrate within project area. In RHCAs and terrestrial habitat where Boreal Toad exist, temporary area avoidance is expected while mechanized equipment or hand crews are present.” EA at 23. “The transient nature of the species will likely place some individuals outside of expected habitat and within proposed action areas that could lead to increase chance of mortality to the individual. The proposed project may impact individuals or habitat, but will not likely contribute to a trend toward federal listing or loss of viability to the population or species. No further discussion.” EA at 46.

We recommend following the direction in the Utah Division of Wildlife Resources Boreal Toad Conservation Plan. [[2]](#footnote-2) This document notes the threats to boreal toad habitat in Utah, most of which are present in the proposed project: fire, habitat fragmentation, livestock grazing, pesticides and contaminants, recreation, roads, timber harvest, and water management. The authors describe specific actions to take to protect boreal toad habitat, including prescriptions for all of the above.

The EA says that impacts to these species would be minimized since they occur within Riparian Habitat Conservation Areas, but the Forest is proposing a great deal of heavy mechanical vegetation removal within those areas. The EA acknowledges impacts to these rare riparian species but, without justification, says they would only be temporary. These species would be “expected” to return. EA at 23. No data are presented to support this supposition.

## VI. THE EA FAILS TO TAKE A HARD LOOK AT THE CUMULATIVE IMPACTS OF, AND ALTERNATIVES TO, CONVENTIONAL POST-TREATMENT CATTLE GRAZING.

There is an abundance of published literature on fire regimes in the west, and almost all of them ascribe the current atypical fire regimes to the same two primary mechanisms: long-term fire suppression and livestock grazing that removes fine fuels. In fact, livestock grazing is cited several times in the EA as contributing to cumulative impacts and a source of degraded resource conditions leading to the need for the project. For example:

Watershed Resources

Page 24: “The main sources of sediment movement into streams is from roads and dispersed camp sites, and from stream bank erosion caused by abandoned beaver dams and *livestock trailing and grazing along streams*.

Page 25: *Water for livestock* and irrigation are the biggest water uses within these

management areas.

Page 29: Direct and indirect effects to water resources attributable to livestock grazing and related activities generally include *forage consumption, soil compaction, streambank disturbance, and development of water sources (spring/stream diversions, riparian exclosures).* With historic grazing, watershed resources were moderately to highly impacted due to topographical constraints, poor distribution, and high stocking rates.“

Rare Plants

Page 44: Crenulate moonwort: “Threatened most by *logging and grazing*; other threats include roads/trails, trampling, recreation, erosion, fuels reduction, ORVs, altered hydrology, soil compaction, invasive species, and climate change…”

Slender moonwort: “…road maintenance activities and other disturbances at several sites, by invasive exotic plants at three sites, and *possibly by livestock grazing* at some sites…”

The Forest blames these on historic overgrazing and maintains that management has improved since then. However, the only information presented to support this assertion is the Monitoring Reports and Rangeland Condition (EA at 30), which contains a generalized narrative and no data. The EA reports that all of the 11 allotments in the Heber-Kamas Ranger District are in “satisfactory condition with stable trends or are trending toward desired condition”. (The document does not provide information on the 2 allotments in the Spanish Fork R.D.) However, this general information on trend is not adequate to describe conditions on the allotments. No definition of Satisfactory is supplied, leaving us to wonder if a higher condition level is possible. All the allotments show a Stable trend, implying that conditions, good or bad, have not changed since the last trend data were collected. But the trend direction for all allotments is also listed as trending upward or making progress toward desired conditions. We don’t know if this is a recent improvement or if an allotment has been “making progress” for decades. In any case, this rating suggests there is still room for improvement in allotment condition. Is livestock management preventing the allotment from achieving a better score?

Given the heavy impacts listed above, even if conditions are better, “improved conditions” does not mean riparian areas are at proper functioning condition. The EA needs to provide better support for its conclusion. More data and analysis are needed before the public can get an accurate idea of range condition and how livestock grazing contributes to the need for the project by removing fine fuels.

In addition, appropriate post-treatment livestock management is crucial to long-term project success. The EA does not mention how the restored areas will be protected from overgrazing, but typically, similar EAs prescribe rest for at least two years. We recommend a more data-based approach. We recommend that “Prior to stocking these areas, an evaluation would be needed to make sure that the rangelands are within 80% of original ground cover values for the site and desirable plant species are established and producing seed.” Something closer to the BLM’s ecological site description is needed for a comparison between what is expected and what is observed.

Aspen Restoration

Improving aspen stand condition is one goal of the project. However, EA proposes specific actions only for prescribed fire and conifer removal, even though it also alludes to the impacts of livestock in its prescription of post-treatment grazing management in aspen: “*additional livestock grazing management practices would be implemented to promote aspen suckers* reaching at least 500 stems per acre and 72 inches in height.” EA at 8. Proposing additional livestock grazing management practices is vague and arbitrary. More specificity is indicated. More to the point, the EA does not analyze the contribution of livestock grazing on the large shift of vegetation away from expected conditions or present alternatives to current livestock management.

Post-treatment Exotic Species Invasion and Expansion

Resuming livestock grazing impacts to a treated area after two years is the definition of a cumulative effect, but it was not analyzed in the EA in spite of the role livestock play in introducing and spreading cheatgrass and other invasive exotics. Also, the EA fails to acknowledge that the resumption of widespread cattle trampling of newly exposed soil after mechanical removal will likewise reduce biological crust, providing a window for cheatgrass invasion. The invasion and increase of cheatgrass cover is a reasonably foreseeable indirect impact of the proposed action in areas that have been previously treated or are slated to be treated in the future, potentially undermining efforts at ecological restoration.

Recommendations:

We submit that a change in livestock management would remove a source of stress on vegetation restoration, slow the decline of vegetation communities, and reduce, at least in some areas, the need for intensive treatments of all kinds in the future. Consequently, it is reasonable to develop and analyze an alternative that manages livestock grazing to promote restoration of post-burn vegetation, even if it is simply an addition to rather than a substitute for the current proposed alternative. These additions could include:

• Bringing livestock obligation in line with rangeland carrying capacity.

• Lowering stocking rates or removing livestock on rangeland in poor or fair condition when recovery of range condition cannot be accomplished by the grazing system.

• Enforcing permit terms and conditions to limit overuse or trespass.

• Reducing utilization to 30% when grazing is resumed after fire because such a reduction would allow for recovery of native plants and resist cheatgrass expansion and achieve restoration goals more quickly.

• Installing post-treatment grazing exclosures as a control against which to measure the action alternative.

## VII. Soil Impacts

The maps in the appendix indicate that the most impactful vegetation treatments, mechanical ground harvest, the most impactful method, is slated for areas with soils that have moderate and high susceptibility to compaction. The EA says that best management practices will be used. Given that the purpose of the project is to reintroduce natural fire frequencies, it seems that prescribed fire would be the preferred method. Manual methods of pre-treatment followed by prescribed fire would fit the purpose and need better and cause less damage to soils, vegetation, and wildlife. Please explain the reasoning behind using mechanical treatments in such high-risk areas.

## VIII. Native Seed

Thank you for committing to using all native seed in the restoration seed mix. EA at 54.

## IX. Conclusion

We agree with the Dixie National Forest that episodic fire must be returned to the landscape if vegetation resources are to regain healthy ecological functioning. However, the current EA does not disclose enough site-specific detail or analysis. The EA assures us that adhering to Design Criteria and Best Management Practices would adequately mitigate risks, but this is too generalized to serve as an adequate description of activities that may occur on the project area.

We urge the Forest Service to:

• Issue this as a Programmatic NEPA document that commits to tiered, site-specific project NEPA analyses that provide for public involvement and comment on individual treatment projects so that the agency can provide the public with a better understanding of the project’s methods, goals, and impacts before a decision is made, and so that the agency can comply with law;

• Ensure compliance with the Roadless Area Conservation Rule

• Avoid mechanical treatments in Riparian Habitat Conservation Areas

• Address the cumulative effects and interaction of post-removal livestock grazing,

drought, and cheatgrass expansion;

• Describe more specifically how exotic infestations will be prevented after burning;

• Analyze at least one action alternative besides the proposed action including 30%

livestock utilization. There is science to support the fact that reducing or removing livestock could achieve at least some of the purpose and need for this project. Analyzing such an alternative would also enable the public and the decision-maker to understand the tradeoffs involved in continued grazing of this landscape.

Thank you for this opportunity to comment.

Sincerely,



1. Stone, K.R., D.S. Pilliod, K.A. Dwire, C.C. Rhoades, S.P. Wollrab, and M.K. Young. 2010. Fuel Reduction Management Practices in Riparian Areas of the Western USA. Environmental Management 46:91–100 DOI 10.1007/s00267-010-9501-7 [↑](#footnote-ref-1)
2. Hogrefe, T.C., C.L. Bailey, P.D. Thompson, and B. Nadolski. Boreal Toad (*Bufo boreas* boreas) Conservation Plan. Publication Number 05-37. Utah Division of Wildlife Resources, Salt Lake City, UT. [↑](#footnote-ref-2)