Data Submitted (UTC 11): 8/19/2021 11:00:00 AM First name: Dr. Paul Last name: Rogers Organization: Western Aspen Alliance Title: Director

Comments: It has come to my attention that the Manti-La Sal National Forest is considering elimination of the Special Interest Area designation from the Grove of The Aspen Giants. While many of the large trees that originally inspired this designation have died off, the unique environment that supports such aspen giants remains. Further, it behooves us to understand those specific conditions that spawn rich aspen habitat, as well as what role forest management, or lack thereof, played in their decline. We are all aware of the famous quote (paraphrased here) about those who do not understand history and their fate of repeating it[hellip]well, it applies to ecology, as well.

As Director of the Western Aspen Alliance at Utah State University, I have been studying aspen ecosystems for the past 25 years. My job consists not only of conducting front-line research in applied ecology, but in presenting these findings to professionals, scientists, and members of the public. At this point in time we have several overlapping issues confronting aspen forests in the West. What might we learn and convey from an exemplary specimen such as the Grove of The Aspen Giants that is not immediately apparent in its current condition?

Similar to the iconic Pando Aspen Clone on the Fishlake National Forest, Grove of The Aspen Giants likely holds lessons, as well as being a tourist attraction, for the researchers and American citizens at-large. As the lead researcher at Pando, I have seen an explosion of interest in this Fisk Lake grove over the past five years [ndash] much of that is due to extensive media coverage, but there would have been no interest without baseline science taking place there.

A leading cause of aspen clone mortality in the West is browsing by wild and domestic ungulates. Could this provide part of the answer for the present state of the Grove of The Aspen Giants? It is likely that contributing factors, such as climate, stem decay, and (potentially) visitor use/damage have also played a part. If aspen stands with strong "ecological buffers" (i.e., rich soils, ample moisture) are collapsing, what promise might we hold out for those more marginal communities lacking in such resources? What is the condition of regeneration at this Grove and what role are other factors playing [ndash] beneficial or detrimental? In short, the [Isquo]lessons learned[rsquo] here may be applied elsewhere.

The Grove of the Aspen Giants appears to hold unique properties that may not be apparent at the current time. Aldo Leopold (1949) urged us, "To keep every cog and wheel is the first precaution of intelligent tinkering." I urge you now to retain this key designation so we may learn from the ecosystem.