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First name: Blake
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Comments: Please see attached the comments from The Pew Charitable Trusts. Thank you.

The Pew Cheritable TrustsFebruary 14, 2021Dear Ashley Forest Plan Revision Team:The Pew Charitable Trusts appreciates the opportunity to submit comments on the Ashley National Forest[rsquo]s Draft Revised Forest Plan and Draft Environmental Impact Statement (Draft Plan/DEIS).Pew[rsquo]s U.S. Public Lands and Rivers Conservation project seeks to preserve ecologically and culturally significant public lands and rivers. To accomplish these goals, we work closely with local businesses, local governments, Indigenous Tribes, the outdoor recreation industry, travel and tourism organizations, veterans, sportsmen and women, and many others to develop collaborative proposals that protect landscapes and local communities.Consistent with this objective, Pew has an interest in the lands and rivers of the Ashley National Forest and implementation of the U.S. Department of Agriculture (USDA) U.S. Forest Service[rsquo]s 2012 Land Management Planning Rule (36 CFR Part 219) through the forest plan revision process. The purpose of the planning rule is to design land and resource management plans, or forest plans, that [ldquo]promote the ecological integrity of national forests[rdquo] and [ldquo]guide management of NFS lands so that they are ecologically sustainable and contribute to social and economic sustainability[rdquo] (36 CFR 219.1(c)). We have a particular interest in the rule as it applies to the identification and conservation of core habitat, the maintenance and safeguarding of free-flowing rivers, and the promotion of habitat connectivity. As the Forest Plan Revision Team prepares its Final Revised Plan and Final EIS in response to public comments on the Draft Plan/DEIS, Pew offers the following comments and suggestions.Area-based Management for Conserving Core Habitat and BiodiversityUnder the planning rule, there are a variety of area-based management approaches available to the Forest Service to tailor management considerations that go beyond forest-wide plan components to reflect the values specific to a given area. These include recommended wilderness, Research Natural Areas, and other management or geographic areas, all of which are important tools for conserving biodiversity, securing core habitat, and supporting other aspects of a forest[rsquo]s ecological integrity. Such approaches are particularly relevant given the goal of President Biden[rsquo]s January 27, 2021 Executive Order on Tackling the Climate Crisis at Home and Abroad, outlined in section 216, to conserve at least 30 percent of our nation[rsquo]s lands and waters by 2030. As the Forest Plan Revision Team prepares the Final Revised Plan, it should incorporate public input to identify areas that protect and enhance the unique and important values of the forest and that further the Administration[rsquo]s overall conservation objectives.Recommended wildernessRecommended wilderness is one of the strongest area-based management tools for preserving biodiversity and core habitat. As part of the forest planning process, the Forest Service is required to determine whether to recommend areas for wilderness designation (36 CFR 219.7(c)(2)(vii)). Chapter 70 of the Land Management Planning Handbook (FSH 1909.12) provides specific guidance for wilderness inventory, evaluation, analysis, and recommendation.Alternative B, the Proposed Action, only recommends two areas totaling 10,335 acres (less than one percent of the forest) for wilderness designation. However, the Forest[rsquo]s own evaluation (see DEIS, App. G, [ldquo]Recommended Wilderness Analysis[rdquo]) supports the recommendation of additional areas for wilderness designation due to the high degree of wilderness characteristics it identified across the forest.Pew recognizes and supports the Forest Service[rsquo]s multiple-use mission and the need to actively restore[mdash]using appropriate means[mdash]landscapes that have departed from their historic ecological condition. However, recommending the four locations identified in Alternative C (Flat Top Mountain, East Uintas, Goose Egg Peak, and Queant Lake) for wilderness designation would provide the best balance among various interests and the forest[rsquo]s unique natural values. Each of these areas possess a high degree of wilderness characteristics and managing them to protect these values would benefit wildlife and core habitat by avoiding intensive human disturbance. It would also benefit local communities by preserving high-quality recreation opportunities and watershed function. All four areas are entirely within Inventoried Roadless Areas and are adjacent to the existing congressionally-designated

High Uintas Wilderness, which would help minimize potential conflict with existing uses (as noted in the Forest[rsquo]s own wilderness evaluation). Recommended wilderness designation would also build on the recognition this landscape has already received from the adjacent congressionally-designated wilderness. As such, the Forest Service should include all 50,157 acres within Flat Top Mountain, East Uintas, Goose Egg Peak, and Queant Lake in the Final Revised Forest Plan[rsquo]s wilderness recommendation.The planning rule also requires the Forest Service to provide for the [ldquo]Protection of congressionally designated wilderness areas as well as management of areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation.[rdquo] (36 CFR 219.10(b)(1)(iv)). The Wilderness Act generally prohibits the use of motorized and mechanized transport within wilderness areas (16 U.S.C. 1133(c)). Therefore, the following plan Standard should be added to address management of recommended wilderness: [ldquo]No motorized or mechanized transport by the public shall be allowed.[rdquo] The addition of this plan component is critical to protect existing wilderness character and is an important complement to DA-ST-PARW-02, which prohibits new route construction.Other area-based managementManagement and geographic areas provide the Forest Service with a flexible tool for applying targeted area-based management in support of specific values (see FSH 1909.12 22.21), particularly Distinctive Roles and Contributions and at-risk species.While the recommendation of additional wilderness areas would support many of these values within the Ashley National Forest, management and geographic areas can be used to support an area[rsquo]s special values when a wilderness recommendation may not be appropriate.Pew is generally supportive of the proposed Recreation Management Area approach for non-wilderness lands in the Ashley National Forest, which assigns lands to one of three categories (Destination, General, or Backcountry) based on similarities in type and intensity of recreational use occurring in those regions. However, we urge incorporation of the Recreation Management Area approach from Alternative C[mdash]rather than Proposed Action, Alternative B[mdash]into the Final Revised Plan. Administratively, the greater acreage of Backcountry Recreation Areas[mdash][ldquo]large, undeveloped landscapes[rdquo] (DEIS, App. E, p.83)[mdash]would likely be less costly than actively managed and developed General and Destination Recreation Areas. Also, the DEIS describes the Ashley[rsquo]s Distinctive Roles and Contributions, which are related to recreation, water resources, terrestrial and aquatic ecosystems, and social and economic values and contributions (see DEIS, App. E, p.7-8). The description of each makes clear that the maintenance of the Ashley[rsquo]s largely primitive and undeveloped character is necessary for these attributes to continue. Therefore, the larger acreage of Backcountry Recreation Areas in Alternative C would best support the forest[rsquo]s Distinctive Roles and Contributions.Additionally, inclusion of Alternative C[rsquo]s version of the approach would help to directly and positively resolve the five significant issues identified through scoping (see DEIS, p.11-12), by including a broader network of Backcountry Recreation Areas and a stronger set of associated plan components for those areas. As described in the Draft Plan, Backcountry Recreation Areas are [ldquo]large, undeveloped landscapes suited for dispersed summer recreation use[rdquo] and include the [ldquo]more remote parts[rdquo] of the forest where [ldquo]access can be challenging[rdquo] (DEIS, App. E, p.83). The broader network of Backcountry Recreation Areas, 739,700 acres in total, is consistent with the existing distribution of recreational opportunities across the Ashley, as reflected by the mapped Recreation Opportunity Spectrum (ROS), and would best support the primitive and undeveloped characteristics that are foundational to the forest[rsquo]s Distinctive Roles and Contributions.Alternative C[rsquo]s plan components for Backcountry Recreation Areas would also do a better job of maintaining those areas existing character by prohibiting commercial timber harvest and motorized use, and by limiting mechanized use to existing trails. Further, the Draft Plan[rsquo]s description of Backcountry Recreation Areas also states that the summer ROS for these areas is Primitive and Semi-primitive Non-Motorized (DEIS, App. E, p.83). 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report, prepared by the research nonprofit Conservation Science Partners (CSP)1 identifies areas of high ecological value on the Ashley National Forest using a composite index developed from science-backed indicators related to biodiversity and carbon. Specifically, the report identifies [ldquo]high ecological value areas,[rdquo] or HEVAs, within the forest; these areas are currently unprotected lands in the top 10% of ecological value based on the composite index. While there is some overlap between HEVAs and areas proposed for conservation-oriented management in the Draft Plan (e.g., near Goose Egg Peak), the Forest Plan Revision Team should reconsider the proposed management where there is not alignment.1 Conservation Science Partners. 2021. Ecological value of lands in the Ashley National Forest. Final Report. Truckee, CA.The CSP report is attached and associated GIS files are available upon request. We encourage the agency to incorporate the report[rsquo]s findings into the Final Revised Plan, in order to ensure that BASI is fully considered and, moreover, that the ecological integrity of the forest is retained by appropriately targeting key areas for conservation-oriented management.Migration and ConnectivityThe seasonal movement of big game species, such as mule deer, is a critical component of their survival that allows them to access seasonally available forage and to escape inhospitable conditions. Prolonged access to high-quality forage is a key benefit of seasonal migration for ungulates.2 This foraging advantage may help migrating wildlife attain greater nutritional condition (e.g., body fat levels)3 and reproductive success4 than their resident non-migratory counterparts, resulting in greater population productivity and abundance.2 Hebblewhite M, Merrill E, and McDermid G. 2008. A multi-scale Test of the forage maturation hypothesis in a partially migratory ungulate population. Ecol Monogr 78: 141[ndash]66.3 Middleton AD, Merkle JA, McWhirter DE, et al. 2018. Green-wave surfing increases fat gain in a migratory ungulate. Oikos 127: 1060[ndash]68.4 Hebblewhite M, Merrill E, and McDermid G. 2008. A multi-scale test of the forage maturation hypothesis in a partially migratory ungulate population. Ecol Monogr 78: 141[ndash]66.Migratory ungulates require intact landscapes to maintain robust population levels. Land use changes, development, and/or habitat fragmentation impact these ancient corridors in myriad ways, and once lost they are exceedingly difficult to restore.According to the Western Association of Fish and Wildlife Agencies[rsquo] [ldquo]2020 Range-Wide Status of Black-Tailed and Mule Deer[rdquo] report, the Utah mule deer population is experiencing a marked decline and current numbers are well below objectives. The report states: [ldquo][T]he current statewide population estimate is 319,150, with a total population objective of 453,100. This is a decrease of over 50,000 deer from previous years, largely due to severe drought followed by harsh winter conditions.The State of Utah is addressing this population decline with new policies that prioritize the maintenance of functional migration corridors for mule deer and other big game. In 2020, the Utah State Legislature passed House Concurrent Resolution 132 to recognize that the protection of fish and wildlife migration corridors improve big game herds crucial to the state[rsquo]s outdoor recreation economy; consequently, the resolution [ldquo]urges continued state investment in wildlife connectivity and encourages state and local governments to adopt policies to protect and restore intact fish and wildlife connectivity and migration corridors and promote road safety.[rdquo]Utah Department of Wildlife Resources (UDWR) has identified multiple migration corridors and other crucial seasonal habitats as a conservation priority in their most recent State Action Plan.3 UDWR has conducted migration research on the North Slope and Uinta South Slope mule deer herds that, in part, utilize the Ashley National Forest. The migration routes on the map below (SEE ATTACHMENT FOR MAP: KNOWN MULE DEER MIGRATION CORRIDORS INTERSECTING ASHLEY NATIONAL FOREST) were derived from GPS collar data using a regular Brownian Bridge Movement Model delineating low, medium, and high-use corridors.4 Crucial stopover habitat, defined as the top 10 percent of the population utilization distribution, is also included. Current research indicates that [ldquo]stopovers play a key role in the migration strategy of mule deer by allowing individuals to migrate in concert with plant phenology and maximize energy intake rather than speed.[rdquo] The Final Revised Plan for the Ashley should account for this information by recognizing known corridors and associated habitats and include specific plan components to address and sustain connectivity.The conservation of big game migration corridors and seasonal habitats directly contributes to the planning rule[rsquo]s requirements related to ecological, social, and economic sustainability (see 36 CFR Part 219). The revision of the Ashley forest plan provides a significant opportunity to promote the conservation and restoration of ecological connectivity for big game, as well as the numerous other species that utilize the same habitat. Despite significant new data that shows numerous migration corridors throughout the forest, the Draft Plan does not provide explicit plan direction for preserving wildlife migration corridors and only

vague references to the need to maintain habitat connectivity.While Alternative C[rsquo]s plan components for Backcountry Recreation Areas and Recommended Wilderness Areas will do a better job of maintaining big game migratory habitat and connectivity than the Proposed Action, Alternative B, both alternatives fall short of prioritizing ecological connectivity for big game and other species that utilize the forest. UDWR has identified multiple migration corridors and other crucial seasonal habitats throughout the forest. The Final Revised Plan should account for this information by addressing and seeking to maintain known corridors and seasonal habitats. We strongly recommend that the Final Revised Plan include a Desired Condition that the ecological conditions of habitat connectivity are present on the forest in known migration corridors, as well as Objectives to remove barriers to connectivity and restore habitat function. Additionally, we recommend the Final Revised Plan include Standards and Guidelines to address and protect migratory habitats by avoiding impacts from uses that impair connectivity. Finally, we recommend the Final Revised Plan consider designating high value migratory habitats as Wildlife Management Areas with plan components that limit disturbance to wildlife and habitat alternations. These additions will better align the Final Revised Plan with the policies and priorities of the State of Utah, as well as the direction outlined in the 2012 planning rule (36 CFR Part 219) to maintain the integrity and functionality of seasonal and migratory habitat.New technologies, such as GPS-enabled collars that allow biologists to track animal movements in real time have dramatically enhanced knowledge about the movement characteristics of big game species, including the length and location of migration routes throughout the state of Utah. Intact habitat, utilized by migrating big game, supports multiple species and increases the resiliency of forests.There are multiple elements in the planning rule (36 CFR Part 219) which directly support the inclusion of management direction for the conservation of migrating big game. Specifically, the planning rule:1. Sets expectations that revised forest plans will maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watershed within the plan area, including maintaining or restoring structure, function, composition, and connectivity ([sect] 219.8).2. Requires consideration of the plan area[rsquo]s contribution to ecological conditions within the broader landscape ([sect] 219.8(a)(ii)), how conditions within the broader landscape may influence sustainability within the plan area ([sect] 219.8(a)(iii)), and opportunities for landscape scale restoration ([sect] 219.8(a)(vi)).3. Directs the Forest Service to collaborate with federally recognized Tribes, Alaska Native Corporations, other Federal agencies, and State and local governments when developing plan components to provide for habitat for species used and enjoyed by the public ([sect] 219.10(a)(5)).4. Requires consideration of habitat conditions for species used by the public for hunting, fishing, trapping, gathering, observing, subsistence, and other activities ([sect] 219.10(a)(5)).5. The Forest Service is also directed by the rule to consider the plan area[rsquo]s role and contribution within a broader landscape ([sect] 219.7(f)(1(ii)), which is relevant for forests where migration corridors and seasonal habitats span multiple land ownerships, and where the plan area plays an important role in the context of the broader landscape.Complementing this direction in the planning rule, on October 14, 2020, in a memo to Regional Foresters and Forest Supervisors in Regions 1, 2, 3, 4, 5, and 6, the Forest Service Washington Office issued additional guidance emphasizing the importance of conserving migratory corridors for big game. The memo speaks to the importance of conserving migratory corridors for elk, mule deer, and pronghorn as well as prioritizing the improvement of winter range conditions. The memo encourages forests [ldquo]in the spirit of shared stewardship, to coordinate and collaborate with states on landscape-scale issues as well as to look at potential improvements on big game summer range habitat which occur on many National Forests.[rdquo]Recommended management tools to address connectivityIdentifying high priority areas for wildlife connectivity allows forest managers to focus on locations with elevated conservation value. Among the top habitat types to protect to maintain the integrity and functionality of migratory habitats throughout the Ashley National Forest are crucial seasonal habitat blocks, high-use migration corridors, stopover habitat sites, birthing grounds, areas utilized by multiple herds and/or species, and travel bottlenecks. While the Draft Plan recognizes that native ungulate migration corridors are present throughout the planning area, and management may consider the effects (beneficial and/or adverse) from proposed management actions to known native ungulate migration corridors (see DEIS, App. E, p.108), the Proposed Action, Alternative B, falls short of providing explicit plan direction for preserving migratory habitats and only vague references to the need to maintain habitat connectivity.In order to maintain the integrity and functionality of these priority habitats, the Final Revised Plan for the Ashley National Forest should administratively designate appropriate lands as Wildlife Management Areas (WMA) with specific plan

components for wildlife that limit surface disturbance in known migration corridors and associated seasonal habitats while allowing for the broader forest plan to balance other multiple uses. The Grand Mesa, Uncompahgre, and Gunnison National Forests[rsquo] (GMUG) Draft Revised Forest Plan and Draft Environmental Impact Statement (Draft Plan/DEIS) released in 2021 can serve as model for using Wildlife Management Areas as a tool to protect wildlife habitat. In that planning process, the Forest Service worked closely with Colorado Parks and Wildlife to ensure that the WMA[rsquo]s benefit big game species and their habitat, but that they also provide improved outcomes for a host of other species.Recommended Desired Conditions to address big game habitat and connectivityThe Draft Plan currently acknowledges that the plan area [ldquo]provides habitat that is needed for feeding, breeding, and sheltering by native species, particularly during periods of high energy demands, such as reproductive seasons and winter[rdquo] (DEIS, App. E, p.34), but the Proposed Action, Alternative B, includes no explicit recommended Desired Condition statement to address the conservation of these migratory habitats and connectivity.In order to maintain the integrity and functionality of seasonal and migratory habitat, the Ashley[rsquo]s Final Revised Plan should include a forest-wide Desired Condition that the ecological conditions for habitat connectivity are present on the forest in known migration corridors. This desired condition could focus on maintaining or restoring undisturbed blocks of core habitat, migration corridors and associated stopover habitat sites throughout the forest that provide functional security, abundant forage and cover for populations of big game and other migratory species to move throughout the landscape. These core habitat blocks and their associated migration corridors should be avoided by roads and trails and provide effective cover to allow for relatively unabated movement of big game species across the landscape preserving connectivity throughout the forest.Additionally, Objectives to remove barriers to connectivity, improve forage conditions, protect intact landscapes, and restore habitat function should be prioritized.Recommended Standards and Guidelines to address big game habitat and connectivityThe Draft Plan currently recommends that [ldquo]management activities should avoid, minimize, or mitigate surface disturbance on native ungulate (animals with hooves) winter ranges during the winter season, generally considered to be November 15 through April 30[rdquo] (DEIS, App. E, p.34), but the Proposed Action, Alternative B, falls short of providing any specific standards and guidelines that prioritize the identification and conservation of big game migration corridors and associated habitats.In order to maintain forest wide connectivity and the integrity and functionality of seasonal and migratory habitat, the Ashley[rsquo]s Final Revised Plan should include Standards and Guidelines that prioritize the identification and conservation of stopover habitat sites, crucial ranges, birthing grounds, areas utilized by multiple herds and/or species, migration bottlenecks, and other areas where sensitive behaviors occur. In known migration corridors, uses that could impair ecological conditions necessary for forest-wide connectivity should be limited.We recommend plan components within recommended WMAs, or forest-wide, include those that:1. Prohibit ground disturbance activities in identified migration corridors and key habitat areas during occupancy and use by big game.2. Restrict commercial timber harvesting within WMAs unless such harvesting is designed in a way that provides a benefit to wildlife habitat.3. Collaborate with UDWR to identify additional priority blocks of core seasonal habitats, stopover habitat, and the migration corridors necessary to connect them.4. Initiate projects that restore and enhance habitat conditions within the WMAs and identified migration corridors.5. Decommission or seasonally close roads that impact migration corridors and associated seasonal habitat.Pew appreciates your consideration of our comments on the Ashley National Forest planning process and we look forward to continued engagement. Please don[rsquo]t hesitate to reach out should you have any questions about these comments.Sincerely,Blake Busse Principal Associate U.S. Public Lands and Rivers Conservation The Pew Charitable Trustsbbusse@pewtrusts.org720-822-5998

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Department of Agriculture (USDA) U.S. Forest Service[rsquo]s 2012 Land Management Planning Rule (36 CFR Part 219) through the forest plan revision process. The purpose of the planning rule is to design land and resource management plans, or forest plans, that [ldquo]promote the ecological integrity of national forests[rdquo] and [ldquo]guide management of NFS lands so that they are ecologically sustainable and contribute to social and economic sustainability[rdquo] (36 CFR 219.1(c)). We have a particular interest in the rule as it applies to the identification and conservation of core habitat, the maintenance and safeguarding of free-flowing rivers, and the promotion of habitat connectivity. As the Forest Plan Revision Team prepares its Final Revised Plan and Final EIS in response to public comments on the Draft Plan/DEIS, Pew offers the following comments and suggestions.Area-based Management for Conserving Core Habitat and BiodiversityUnder the planning rule, there are a variety of area-based management approaches available to the Forest Service to tailor management considerations that go beyond forest-wide plan components to reflect the values specific to a given area. These include recommended wilderness, Research Natural Areas, and other management or geographic areas, all of which are important tools for conserving biodiversity, securing core habitat, and supporting other aspects of a forest[rsquo]s ecological integrity. Such approaches are particularly relevant given the goal of President Biden[rsquo]s January 27, 2021 Executive Order on Tackling the Climate Crisis at Home and Abroad, outlined in section 216, to conserve at least 30 percent of our nation[rsquo]s lands and waters by 2030. As the Forest Plan Revision Team prepares the Final Revised Plan, it should incorporate public input to identify areas that protect and enhance the unique and important values of the forest and that further the Administration[rsquo]s overall conservation objectives.Recommended wildernessRecommended wilderness is one of the strongest area-based management tools for preserving biodiversity and core habitat. As part of the forest planning process, the Forest Service is required to determine whether to recommend areas for wilderness designation (36 CFR 219.7(c)(2)(vii)). 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However, recommending the four locations identified in Alternative C (Flat Top Mountain, East Uintas, Goose Egg Peak, and Queant Lake) for wilderness designation would provide the best balance among various interests and the forest[rsquo]s unique natural values. Each of these areas possess a high degree of wilderness characteristics and managing them to protect these values would benefit wildlife and core habitat by avoiding intensive human disturbance. It would also benefit local communities by preserving high-quality recreation opportunities and watershed function. All four areas are entirely within Inventoried Roadless Areas and are adjacent to the existing congressionally-designated High Uintas Wilderness, which would help minimize potential conflict with existing uses (as noted in the Forest[rsquo]s own wilderness evaluation). 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In 2020, the Utah State Legislature passed House Concurrent Resolution 132 to recognize that the protection of fish and wildlife migration corridors improve big game herds crucial to the state[rsquo]s outdoor recreation economy; consequently, the resolution [ldquo]urges continued state investment in wildlife connectivity and encourages state and local governments to adopt policies to protect and restore intact fish and wildlife connectivity and migration corridors and promote road safety.[rdquo]Utah Department of Wildlife Resources (UDWR) has identified multiple migration corridors and other crucial seasonal habitats as a conservation priority in their most recent State Action Plan.3 UDWR has conducted migration research on the North Slope and Uinta South Slope mule deer herds that, in part, utilize the Ashley National Forest. The migration routes on the map below (SEE ATTACHMENT FOR MAP: KNOWN MULE DEER MIGRATION CORRIDORS INTERSECTING ASHLEY NATIONAL FOREST) were derived from GPS collar data using a regular Brownian Bridge Movement Model delineating low, medium, and high-use corridors.4 Crucial stopover habitat, defined as the top 10 percent of the population utilization distribution, is also included. Current research indicates that [ldquo]stopovers play a key role in the migration strategy of mule deer by allowing individuals to migrate in concert with plant phenology and maximize energy intake rather than speed.[rdquo] The Final Revised Plan for the Ashley should account for this information by recognizing known corridors and associated habitats and include specific plan components to address and sustain connectivity.The conservation of big game migration corridors and seasonal habitats directly contributes to the planning rule[rsquo]s requirements related to ecological, social, and economic sustainability (see 36 CFR Part 219). The revision of the Ashley forest plan provides a significant opportunity to promote the conservation and restoration of ecological connectivity for big game, as well as the numerous other species that utilize the same habitat. Despite significant new data that shows numerous migration corridors throughout the forest, the Draft Plan does not provide explicit plan direction for preserving wildlife migration corridors and only vague references to the need to maintain habitat connectivity.While Alternative C[rsquo]s plan components for Backcountry Recreation Areas and Recommended Wilderness Areas will do a better job of maintaining big game migratory habitat and connectivity than the Proposed Action, Alternative B, both alternatives fall short of prioritizing ecological connectivity for big game and other species that utilize the forest. UDWR has identified multiple migration corridors and other crucial seasonal habitats throughout the forest. The Final Revised Plan should account for this information by addressing and seeking to maintain known corridors and seasonal habitats. We strongly recommend that the Final Revised Plan include a Desired Condition that the ecological conditions of habitat connectivity are present on the forest in known migration corridors, as well as Objectives to remove barriers to connectivity and restore habitat function. Additionally, we recommend the Final Revised Plan include Standards and Guidelines to address and protect migratory habitats by avoiding impacts from uses that impair connectivity. Finally, we recommend the Final Revised Plan consider designating high value migratory habitats as Wildlife Management Areas with plan components that limit disturbance to wildlife and habitat alternations. These additions will better align the Final Revised Plan with the policies and priorities of the State of Utah, as well as the direction outlined in the 2012 planning rule (36 CFR Part 219) to maintain the integrity and functionality of seasonal and migratory habitat.New technologies, such as GPS-enabled collars that allow biologists to track animal movements in real time have dramatically enhanced knowledge about the movement

characteristics of big game species, including the length and location of migration routes throughout the state of Utah. Intact habitat, utilized by migrating big game, supports multiple species and increases the resiliency of forests.There are multiple elements in the planning rule (36 CFR Part 219) which directly support the inclusion of management direction for the conservation of migrating big game. Specifically, the planning rule:1. Sets expectations that revised forest plans will maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watershed within the plan area, including maintaining or restoring structure, function, composition, and connectivity ([sect] 219.8).2. Requires consideration of the plan area[rsquo]s contribution to ecological conditions within the broader landscape ([sect] 219.8(a)(ii)), how conditions within the broader landscape may influence sustainability within the plan area ([sect] 219.8(a)(iii)), and opportunities for landscape scale restoration ([sect] 219.8(a)(vi)).3. Directs the Forest Service to collaborate with federally recognized Tribes, Alaska Native Corporations, other Federal agencies, and State and local governments when developing plan components to provide for habitat for species used and enjoyed by the public ([sect] 219.10(a)(5)).4. Requires consideration of habitat conditions for species used by the public for hunting, fishing, trapping, gathering, observing, subsistence, and other activities ([sect] 219.10(a)(5)).5. The Forest Service is also directed by the rule to consider the plan area[rsquo]s role and contribution within a broader landscape ([sect] 219.7(f)(1(ii)), which is relevant for forests where migration corridors and seasonal habitats span multiple land ownerships, and where the plan area plays an important role in the context of the broader landscape.Complementing this direction in the planning rule, on October 14, 2020, in a memo to Regional Foresters and Forest Supervisors in Regions 1, 2, 3, 4, 5, and 6, the Forest Service Washington Office issued additional guidance emphasizing the importance of conserving migratory corridors for big game. The memo speaks to the importance of conserving migratory corridors for elk, mule deer, and pronghorn as well as prioritizing the improvement of winter range conditions. The memo encourages forests [ldquo]in the spirit of shared stewardship, to coordinate and collaborate with states on landscape-scale issues as well as to look at potential improvements on big game summer range habitat which occur on many National Forests.[rdquo]Recommended management tools to address connectivityIdentifying high priority areas for wildlife connectivity allows forest managers to focus on locations with elevated conservation value. Among the top habitat types to protect to maintain the integrity and functionality of migratory habitats throughout the Ashley National Forest are crucial seasonal habitat blocks, high-use migration corridors, stopover habitat sites, birthing grounds, areas utilized by multiple herds and/or species, and travel bottlenecks. While the Draft Plan recognizes that native ungulate migration corridors are present throughout the planning area, and management may consider the effects (beneficial and/or adverse) from proposed management actions to known native ungulate migration corridors (see DEIS, App. E, p.108), the Proposed Action, Alternative B, falls short of providing explicit plan direction for preserving migratory habitats and only vague references to the need to maintain habitat connectivity.In order to maintain the integrity and functionality of these priority habitats, the Final Revised Plan for the Ashley National Forest should administratively designate appropriate lands as Wildlife Management Areas (WMA) with specific plan components for wildlife that limit surface disturbance in known migration corridors and associated seasonal habitats while allowing for the broader forest plan to balance other multiple uses. The Grand Mesa, Uncompahgre, and Gunnison National Forests[rsquo] (GMUG) Draft Revised Forest Plan and Draft Environmental Impact Statement (Draft Plan/DEIS) released in 2021 can serve as model for using Wildlife Management Areas as a tool to protect wildlife habitat. In that planning process, the Forest Service worked closely with Colorado Parks and Wildlife to ensure that the WMA[rsquo]s benefit big game species and their habitat, but that they also provide improved outcomes for a host of other species.Recommended Desired Conditions to address big game habitat and connectivityThe Draft Plan currently acknowledges that the plan area [ldquo]provides habitat that is needed for feeding, breeding, and sheltering by native species, particularly during periods of high energy demands, such as reproductive seasons and winter[rdquo] (DEIS, App. E, p.34), but the Proposed Action, Alternative B, includes no explicit recommended Desired Condition statement to address the conservation of these migratory habitats and connectivity.In order to maintain the integrity and functionality of seasonal and migratory habitat, the Ashley[rsquo]s Final Revised Plan should include a forest-wide Desired Condition that the ecological conditions for habitat connectivity are present on the forest in known migration corridors. This desired condition could focus on maintaining or restoring undisturbed blocks of core habitat, migration corridors and associated stopover habitat sites throughout the forest that provide functional security,

abundant forage and cover for populations of big game and other migratory species to move throughout the landscape. These core habitat blocks and their associated migration corridors should be avoided by roads and trails and provide effective cover to allow for relatively unabated movement of big game species across the landscape preserving connectivity throughout the forest.Additionally, Objectives to remove barriers to connectivity, improve forage conditions, protect intact landscapes, and restore habitat function should be prioritized.Recommended Standards and Guidelines to address big game habitat and connectivityThe Draft Plan currently recommends that [ldquo]management activities should avoid, minimize, or mitigate surface disturbance on native ungulate (animals with hooves) winter ranges during the winter season, generally considered to be November 15 through April 30[rdquo] (DEIS, App. E, p.34), but the Proposed Action, Alternative B, falls short of providing any specific standards and guidelines that prioritize the identification and conservation of big game migration corridors and associated habitats.In order to maintain forest wide connectivity and the integrity and functionality of seasonal and migratory habitat, the Ashley[rsquo]s Final Revised Plan should include Standards and Guidelines that prioritize the identification and conservation of stopover habitat sites, crucial ranges, birthing grounds, areas utilized by multiple herds and/or species, migration bottlenecks, and other areas where sensitive behaviors occur. In known migration corridors, uses that could impair ecological conditions necessary for forest-wide connectivity should be limited.We recommend plan components within recommended WMAs, or forest-wide, include those that:1. Prohibit ground disturbance activities in identified migration corridors and key habitat areas during occupancy and use by big game.2. Restrict commercial timber harvesting within WMAs unless such harvesting is designed in a way that provides a benefit to wildlife habitat.3. Collaborate with UDWR to identify additional priority blocks of core seasonal habitats, stopover habitat, and the migration corridors necessary to connect them.4. Initiate projects that restore and enhance habitat conditions within the WMAs and identified migration corridors.5. Decommission or seasonally close roads that impact migration corridors and associated seasonal habitat.Pew appreciates your consideration of our comments on the Ashley National Forest planning process and we look forward to continued engagement. Please don[rsquo]t hesitate to reach out should you have any questions about these comments.Sincerely,Blake Busse Principal Associate U.S. Public Lands and Rivers Conservation The Pew Charitable Trustsbbusse@pewtrusts.org720-822-5998