



**ROCKY MOUNTAIN
ELK FOUNDATION**

November 7, 2019

Ashley National Forest
Attn: Cathleen Neelan
355 North Vernal Ave
Vernal, UT 84078

Re: Ashley National Forest Plan Revision: Need for Change

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the draft of the Ashley National Forest Plan Revision Need for Change (Plan). The mission of RMEF is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. RMEF's 234,000+ members include hunters, ranchers, guides, outfitters, other business owners, wildlife enthusiasts, and other conservationists who have both recreational and economic interests in hunting and enjoying elk on National Forests. Since its creation in 1984, RMEF has permanently protected and enhanced more than 7.6 million acres of North America's most vital habitat for elk and other wildlife, including over 1.1 million acres in Utah. As such, RMEF has an interest in ensuring the future productivity of elk and other wildlife in Utah.

RMEF recognizes that the Forest Plan Revision Process under the 2012 planning rule is designed to emphasize restoration of natural resources to make our National Forests more resilient to climate change, protect water resources, and improve forest health. We request that the following general recommendations be incorporated into the Forest Plan and in subsequent project design and implementation:

Inclusion of elk and elk habitat in planning efforts:

- Healthy, free-roaming elk herds contribute to and are intermingled with the social well-being, ecological integrity, and cultural and economic goals of the Forest. Because of this, RMEF suggests that elk and elk habitat be considered a focus for management planning efforts. Elk and other big game serve 'distinct roles and contributions' to multiple user types on the Forest (viewing, hunting, etc.) and the Forest Plan plays an important role in supporting future big game populations.

Coordination with state wildlife agencies:

- RMEF works closely with each state's wildlife agency. These agencies are our vital partners. In setting new management directions for elk habitat in forest plans and project design, we encourage that the forest planning effort be coordinated with state wildlife agencies and that state agency goals for elk be integrated into the Plan. RMEF encourages the Forest Service to utilize State Comprehensive Wildlife Plans and data in developing desired outcomes and monitoring results related to the management of elk and other wildlife species on the National Forest.

Actively managed landscapes:

- Past and recent research has identified several challenges to North America's elk country, including unnaturally dense forests, invasions of noxious weeds, lack of dependable water sources, and many others. RMEF supports use of the past 25+ years of research from the Starkey Project and other studies that have laid the groundwork for managing healthy elk habitat (Quigley and Wisdom 2015). More recent research on ungulate migration (Sawyer et al. 2013, Middleton et al. 2013), nutrition (Cook et al. 2013, Wisdom et al. 2018), and elk security (Ranglack et al. 2017, Wisdom et al. 2018) continue to build on this foundation. RMEF recommends that the Plan incorporate recent research on the benefits of actively managed landscapes and relevant components of Executive Order 13855 on active management on America's forests (2018).
- Early seral forest provides important habitat for elk and other wildlife and is often achieved following disturbance such as fire and mechanical thinning. Decades of fire suppression have reduced early successional stages across the National Forest System. RMEF supports the use of mechanical thinning and prescribed burning to encourage growth of grasses, forbs, young shrubs, and trees that provide critical forage and cover for elk and other species (Swanson et al. 2011). Prescribed burns not only improve elk habitat, but also can help reduce the threat of catastrophic wildfire in the future. RMEF supports this work which complements Forest Service fire, fuels and vegetation management goals.
- RMEF supports balanced use of timber production and encourages consideration of wildlife habitat enhancement through timber production activities. Opportunities for timber production which can provide greater flexibility in using the full array of active vegetation management activities are more effective at meeting desired vegetative conditions.
- RMEF is very supportive of active management on our public lands to benefit wildlife habitat and fire risk management. Wilderness designation presents a concern, as these acres are not eligible for various active management activities. As such, RMEF supports management directions that limit additional Wilderness acreages.
- Noxious and invasive plants are slowly replacing native forage for elk and other species. RMEF encourages the Forest Service to actively manage landscapes to control and reduce noxious weeds through an integrated weed management approach (biological, mechanical, chemical, and outreach). Early detection and rapid response remains a critical component of effective weed management (Westbrooks 2004); RMEF encourages this collaborative approach for prompt containment and treatment of noxious and invasive plants. Native plant communities provide the highest nutritional value, thus RMEF encourages the use of native plant seed mixes.
- Managed livestock grazing can improve the health of rangelands and forest meadows if the system is designed with habitat values for elk and other wildlife in mind. An effective range management program between the agency and permittees is essential to maintaining the economic base and lifestyle that have helped keep private lands across elk country as working ranches. RMEF encourages the Forest Service to employ grazing management systems and techniques compatible with maintaining desired levels of elk and other wildlife.

Resource management and land protection across land ownership:

- Public lands are where the majority of the public hunts and otherwise enjoys elk. In some places a growing portion of elk are using private land. Where elk populations are at or over population objectives, RMEF suggests considering elk occurrence specific to USFS lands. In many situations, the geographic units used to monitor elk population objectives are comprised of varying amounts of private ownership. The numbers may not reflect elk use of USFS lands. An area can be over objective, with relatively low occurrence of elk on National Forests. RMEF recognizes that some factors affecting elk distribution off of Forest Service lands are not due to Forest Service management. While multiple factors can affect distribution of elk and other big game across public and private lands, RMEF recommends inclusion of Desired Conditions (DCs) that emphasize coordination between the National Forest, state wildlife agencies, private landowners, and others to provide habitat conditions that support year-round presence of elk and other big game on the Forest.
- Each year, our National Forests become more critical to elk and other wildlife due to habitat loss on private land. When privately owned wildlife habitat within or immediately adjacent to the National Forest becomes available for purchase, we urge the National Forest to work with RMEF and other national and local conservation groups to acquire parcels, enter into land exchanges, or obtain conservation easements to secure more elk habitat for the future.
- Wildlife connectivity is increasingly threatened by habitat loss and degradation as well as development activities. RMEF recommends Plan components that recognize the importance of big game migration corridors and include management direction for protecting corridors across National Forest and neighboring lands.

Management of motorized and non-motorized recreation:

- Elk and many other wildlife species are sensitive to human travel patterns, especially motorized use. Research from the Starkey Project has done much to quantify effects of roads, trails, and associated motorized (Wisdom et al. 2005) and non-motorized traffic on elk (Wisdom et al. 2018). RMEF supports a balanced approach regarding the Recreation Opportunity Spectrum. Multi-use activities occur year-round, and RMEF recommends that the Forest provide access for those seeking varied experiences (primitive and roaded). However, RMEF also recommends inclusion of Desired Conditions, Goals, and/or Guidelines that provide seasonal protection (during critical times) for elk and other wildlife from impacts of recreation (via roads, trails and associated motorized and non-motorized traffic).

Public access and hunting heritage:

- For many hunter-conservationists, public lands provide the best opportunity to pursue their hunting heritage. These activities deliver economic benefits for local communities, as well as cultural and social benefits. RMEF recommends inclusion of hunting, fishing, trapping and shooting sports as contributing to local economies and the well-being and quality of life of National Forest users. The Forest Plan should provide for the continuation of these activities as a valid and vital component of the recreation spectrum. The Federal Lands Hunting, Fishing & Shooting Sports Roundtable MOU between the U.S. Department of Agriculture, the U.S. Department of the Army, and the U.S. Department of the Interior (2011) develops and expands a framework of cooperation among the parties at all levels for planning and

implementing mutually beneficial projects and activities related to hunting, fishing, trapping and shooting sports conducted on federal land.

- Identified as the largest barrier to maintaining hunting and angling participation, access to public land plays a critical role in ensuring the future of our hunting heritage. RMEF recommends consideration of public land access needs in forest planning efforts, including close collaboration with state wildlife agencies to create or maintain access points to the National Forest that are important for managing wildlife. In addition, RMEF recommends inclusion of relevant components within Executive Order 13443 on facilitation of hunting heritage and wildlife conservation (2007) and the John D. Dingell, Jr. Conservation, Management, and Recreation Act (2019).

RMEF appreciates the opportunity to engage in the Forest Planning efforts of the Ashley National Forest. We look forward to reviewing the Draft Plan, when available.

Sincerely,

A handwritten signature in black ink, appearing to read "Blake L. Henning". The signature is fluid and cursive, with a large, stylized flourish at the end.

Blake L. Henning
Chief Conservation Officer

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