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Comments: Please see attachment. Thank you.

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Ashley National Forest

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Comments submitted electronically at: <https://www.fs.usda.gov/project/?project=49606>

November 8, 2019

RE: Comments on the Ashley National Forest - Forest Plan Revision #49606

Wild Utah Project is a 501(3)c non-profit conservation organization based in Salt Lake City, Utah. Our mission is to provide science-based strategies for wildlife and land conservation. For 23 years, we have applied the principles of conservation science to land and wildlife management. We bring together community science volunteers, wildlife and habitat studies, technical support, and computer mapping analysis using Geographic Information Systems (GIS) to conservation partners in our region. Wild Utah Project works with state and federal agencies to fill critical wildlife and habitat data gaps necessary to make more informed management decisions about our public resources.

We appreciate the opportunity to provide comment to the Ashley National Forest (ANF or the Forest) Plan revision. Our comments focus on actions that impact wildlife resources and their habitats.

Comments on the Preliminary Need to Change the Ashley National Forest Land Management Plan

The Need to Change documents the primary focus topics for resource management in the forest plan as:

1. Sustainable Recreation
2. Economic Resiliency
3. Managing Traditional Resources
4. Tribal Relations and Cultural Resources
5. Managing for Resilient Ecosystems and Watersheds
 - a. Protect and Restore Terrestrial Ecosystems
 - b. Protect and Restore Aquatic, Riparian and Groundwater Dependent
 - c. Reduce Conifer Encroachment into Non-Forest Communities

Need to Change Comment 1

Page 4

Consider removing "oil and gas" as a traditional resource on the Forest. Oil and gas development is currently addressed under "2. Economic Resiliency" and should not be considered a "traditional" resource on the Forest.

Need to Change Comment 2

Page 5

Consider removing "Reduce Conifer Encroachment into Non-Forest Communities" as one of three focus topics under "Managing for Resilient Ecosystems and Watersheds." The Draft Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest does not identify conifer encroachment as a priority topic on the ANF. Many other priority topics fall under "a. Protect and Restore Terrestrial Ecosystems" and "b. Protect and Restore Aquatic, Riparian and Groundwater Dependent." Based on the Assessment and best-available science, please consider air quality, carbon sequestration, habitat fragmentation/migration corridors, and species diversity as focus topics instead of conifer encroachment.

Comments on the Assessment Reports

Species at Risk Report Comment 1

Please note there is a discrepancy in the "Potential wildlife and fish species of conservation concern located on the Ashley National Forest" listed in the Species at Risk Report and between the species listed in the Proposal to Revise the Land Management Plan for the Ashley National Forest. Please clarify and revise in both the Assessment Report and the Proposal to Revise the Land Management Plan for the Ashley National Forest.

Comments on the Proposal to Revise the Land Management Plan for the Ashley National Forest

Overall Comment 1

Comment related to all resource sections. Please consider developing Objectives for every resource topic and ensure they are concise, measurable, and time-specific.

Overall Comment 2

Comment related to all Guidelines in all resource sections. Consider replacing the word "should" with "shall." Our rationale is that in order to meet the definition, Guidelines need to be considered a "constraint" in order to achieve or maintain a desired condition or conditions, to avoid or mitigate undesirable effects, or to meet applicable legal requirements. Making Guidelines clear with definitive words will avoid confusion during future project-specific permitting. This will make projects-specific planning and impact analysis more certain for both ANF planners and permittees.

Soils

Soil Comment 1

Page 11 states:

03 Where natural site conditions allow, biological soil crusts are present or encouraged to reestablish and to improve nutrient cycling and stabilize soils (including areas of desert-shrub, rangelands, sagebrush, and alpine ecosystems).

Suggested revision:

03 Biological soil crusts are present or encouraged to reestablish and to improve nutrient cycling and stabilize soils (including areas of desert-shrub, rangelands, sagebrush, and alpine ecosystems).

Soil Comment 2

Page 11

Consider adding an Objective, as identified from the Ashley National Forest Assessment for Air, Soil, and Watershed Resources:

"Collect quantitative data on current soil resource condition, trends, and soil productivity."

Soil Comment 3

Page 12

01 For vegetation management activities that include use of ground-based equipment, the cumulative management activities in an activity area should not result in detrimental soil disturbance (see glossary) on more than 15 percent of the area following completion of activities. In an activity area where the preexisting conditions of detrimental disturbance exceed 15 percent of the activity area, management activities should include mitigation and post-project restoration so the activity area is moving toward establishment of a cumulative 15 percent or less detrimentally disturbed soils. Recognizing different forms of soil disturbance require varying time

frames to be remediated. Areas that have restoration that provides for soil stability and adequate ground cover are considered to be improving soil quality.

Where it says "ground cover" consider replacing with "cover of desirable plant species."

Soil Comment 4

Page 12

Consider adding a Guideline:

"Require design features or mitigation measures to reduce impacts of management actions (compaction, displacement, increased bare soil) on all soils disturbed by the development and production of energy and minerals, timber, infrastructure, transportation, and other species uses where soils are impacted."

Watershed and Aquatic Ecosystems

Watershed and Aquatic Ecosystems Comment 1

The ecosystem services provided in the watersheds originating in the Ashley National Forest are significant. As such, we request the Ashley National Forest prepare a separate and detailed Watershed and Riparian Conservation Strategy based on the findings of the Riparian and wetland ecosystems of the Ashley National Forest¹, Assessment of Watershed Vulnerability to Climate Change for the Uinta-Wasatch-Cache

¹ Smith, D. Max; Driscoll, Katelyn P.; Finch, Deborah M. 2018. Riparian and wetland ecosystems of the Ashley National Forest: An assessment of current conditions in relation to natural range of variation. Gen. Tech. Rep. RMRS-GTR-378. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 101 p.

and Ashley National Forests, Utah², and the U.S. Forest Service's Watershed Condition Framework. The Watershed and Riparian Conservation Strategy should identify specific Desired Conditions; how to protect and restore ecological integrity of watersheds, riparian areas, and water quality and water resources; and identify priority watershed(s) for protection, maintenance, and/or restoration.

² Rice, Janine; Bardsley, Tim; Gomben, Pete; Bambrough, Dustin; Weems, Stacey; Leahy, Sarah; Plunkett, Christopher; Condrat, Charles; Joyce, Linda A. 2017. Assessment of watershed vulnerability to climate change for the Uinta-Wasatch-Cache and Ashley National Forests, Utah. Gen. Tech. Rep. RMRS-GTR-362. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 111 p.

Watershed and Aquatic Ecosystems Comment 2

Page 14

01 Watersheds and watershed features (including streams, lakes, riparian areas, and wetlands) retain their ability to respond and adjust to disturbance without long-term, adverse effects to their physical or biological integrity. Watershed resilience to higher air temperatures, reduced snowpack, erratic runoff timing and other effects of climate change is maintained or restored.

Consider revising to state:

"01 Watersheds and watershed features (including streams, lakes, riparian areas, and wetlands) retain their ability to respond and adjust to disturbance without long-term, adverse effects to their physical or biological integrity."

Watershed and Aquatic Ecosystems Comment 3

Page 14

04 Streams, seeps, and wetlands having the potential to support native and desirable nonnative aquatic species provide habitat that is resilient to disturbance and projected warmer and drier climates.

Consider revising to state:

"04 Streams, seeps, and wetlands are resilient to disturbance and projected warmer and drier climates."

Watershed and Aquatic Ecosystems Comment 4

Page 14

09 Where appropriate and suitable habitat exists, beaver play a role in creating and maintaining riparian and wetland areas. These roles include increasing water residence time on the landscape, elevating water tables, connecting streams to the valley floor and floodplain, providing aquatic habitats, increasing over-bank floods, attenuating sediment, and dissipating flood flows.

Consider revising to state:

"09 Beaver play a role in creating and maintaining riparian and wetland areas. These roles include increasing

water residence time on the landscape, elevating water tables, connecting streams to the valley floor and floodplain, providing aquatic habitats, increasing over-bank floods, attenuating sediment, and dissipating flood flows."

Watershed and Aquatic Ecosystems Comment 5

Page 14

03 Aquatic habitat connectivity and ecological conditions, within or between watersheds, support self-sustaining populations of native and desirable nonnative aquatic and riparian species.

Consider revising to:

"03 Aquatic habitat connectivity and ecological conditions, within or and between watersheds, support self-sustaining populations of native and desirable nonnative aquatic and riparian species."

Watershed and Aquatic Ecosystems Comment 6

Page 15

15 Streambeds should contain less than 20 percent fines (sand, silt, clay) in fish spawning habitat.

Consider revising to state:

"5 Streambeds contain less than 20 percent fines (sand, silt, clay) in fish spawning habitat." (also see Overall Comment 2)

Watershed and Aquatic Ecosystems Comment 7

Page 15

16 Sediment producing management activities should be avoided during critical fish spawning periods.

Consider moving this to the "Guidelines" section, as is currently not worded as a Desired Condition.

Consider revising to state:

"16 Sediment producing management activities shall be avoided during critical fish spawning periods."

Watershed and Aquatic Ecosystems Comment 8

Page 15

Consider adding the following Desired Conditions:

"The quality of water emanating from the national forest is sufficient to provide for State-designated beneficial uses, including human uses."

"Water quality in streams within the Forest meets applicable State, local, and tribal water quality criteria."

Watershed and Aquatic Ecosystems Comment 9

Page 15

01 Complete at least one project per year with design features to restore habitat or populations of aquatic species.

02 Improve 10 stream miles of aquatic species habitat every 5 years.

Consider merging the two objectives, increasing the performance metric, and revising to state:

"01 Complete at least 20 miles of stream improvement projects every 5 years. Projects will have design features to restore habitat and populations of aquatic and riparian species."

Riparian Management Zones

Riparian areas are very important to the ecosystem and most wildlife species rely on riparian habitats for some portion of their lifecycle³. Riparian habitats are a priority resource to protect under Wild Utah Project's mission.

3 Theobald, D.M., D.M. Merritt, and J.B. Norman, III. 2010. Assessment of Threats to Riparian Ecosystems in the Western U.S. A report presented to The Western Environmental Threats Assessment Center, Prineville, OR by The U.S.D.A. Stream Systems Technology Center and Colorado State University, Fort Collins, CO, 61p.

Riparian Management Zones Comment 1

Page 16

Consider adding these Desired Conditions:

"The condition of riparian vegetation, including riparian species composition, stand density, and fuel loading, is consistent with healthy riparian systems and reduces risks from high-intensity wildfire in the watershed."

Riparian Management Zones Comment 2

Page 16

02 Riparian management zones accommodate key riparian functions, including streambank stability, desired inputs of organic matter, dispersal of flood flow, sediment capture and filtration, moderation of stream

temperature, and maintenance of water quality.

Consider revising to:

"02 Riparian management zones accommodate key riparian functions, including streambank stability, desired inputs of organic matter, dispersal of flood flow, sediment capture and filtration, moderation of stream temperature, maintenance of water quality, and connectivity (i.e., habitat and flow) between and among terrestrial and aquatic ecosystems and watersheds."

Riparian Management Zones Comment 3

Page 16-17

Table 2. Consider revising to state the following distances. Rationale is that these distances are standard in other post-2012 Forest Plans revisions. We recognize riparian habitats as one of the most important habitats on the Forest.

Riparian Management Zone Type

Default Riparian Management Zone Distance From Feature

Perennial streams, natural ponds,
300 feet on each side of the stream,

lakes, open water wetlands, seeps, springs and reservoirs
measured from the bankfull edge of the stream

Intermittent seasonally flowing channels/waterbodies supporting riparian vegetation.
150 feet on each side of the stream, measured from the bankfull edge of the stream

Ephemeral stream channels/waterbodies, unstable or potentially unstable areas.
150 feet on each side of the stream, measured from the bankfull edge of the stream/waterbody

Riparian Management Zones Comment 4

Page 17

04 The refueling, equipment maintenance, and storage of fuels and toxicants should be avoided within a riparian management zone to protect water quality. Where such actions are necessary (for example, operations for fire suppression or refueling at developed sites and marinas) they should occur in designated areas and have appropriate spill containment provisions onsite.

Consider revising to state:

04 The refueling, equipment maintenance, and storage of fuels and toxicants shall be avoided within a riparian management zone to protect water quality. Where such actions are necessary (for example, operations for fire suppression or refueling at developed sites and marinas) they shall occur in designated areas and have appropriate spill containment provisions onsite.

Riparian Management Zones Comment 5

Page 17

05 New landings, designated skid trails, and log decks should be located outside riparian management zones to maintain and protect aquatic resources and water quality, unless associated with projects to maintain or improve riparian management zone conditions and alternative locations would result in greater risk to resources.

Exceptions may be considered where existing system roads are within the riparian management zone and site specific analysis and implementation of mitigation measures are determined appropriate by a Forest aquatic specialist to protect aquatic and riparian resources. Within the riparian management zone, such features shall be of minimum size, located outside the active floodplain - and designed to minimize negative effects to stream shading, wood recruitment, bank integrity, and stream sediment levels.

Consider revising to:

"05 New landings, designated skid trails, and log decks should shall be located outside riparian management

zones to maintain and protect aquatic resources and water quality, unless associated with projects to maintain or improve riparian management zone conditions and alternative locations would result in greater risk to resources. Exceptions may consider where existing system roads are within the riparian management zone and site specific analysis and implementation of mitigation measures are determined appropriate by a Forest aquatic specialist to protect aquatic and riparian resources. Within the riparian management zone, such features shall be of minimum size, located

outside the active floodplain - and designed to minimize negative effects to stream shading, wood recruitment, bank integrity, and stream sediment levels."

Riparian Management Zones Comment 6

Page 16

06 Construction of new roads, temporary roads, and motorized trails should be avoided in riparian management zones to maintain and protect aquatic resources and water quality, except: [hellip]

Consider revising to:

"06 Construction of new roads, temporary roads, and motorized trails should be avoided in riparian management zones to maintain and protect aquatic resources and water quality, except: [hellip]"

Riparian Management Zones Comment 7

Page 16

Consider adding the following Objectives, at minimum.

"Restore the vegetation structure and composition of at least 500 acres in riparian management zones every 5 years. Priority shall be given to zones that are at most risk from large-scale high-intensity fire, flooding events associated with climate change, or associated with streams listed as 303(d): Impaired Waters."

Terrestrial Vegetation

Terrestrial Vegetation Comment 1

Page 18

02 Ecological processes that drive ecological conditions are present and functioning in a manner that sustains ecological integrity and resilience. Ecosystems respond to and recover from natural disturbances and management practices, concurrent with other existing and foreseeable drivers and stressors without long-term adverse changes in condition and trend.

Consider revising to state:

"02 Ecological processes that drive ecological conditions are present and functioning in a manner that sustains ecological integrity and resilience to climate change. Ecosystems respond to and recover from natural disturbances and management practices, concurrent with other existing and foreseeable drivers and stressors without long-term adverse changes in condition and trend."

Terrestrial Vegetation Comment 2

Page 20

Consider adding specific Standards for the other At-Risk plant species, specifically those that are listed in the Species at Risk Report, Table 3.

Terrestrial Vegetation Comment 3

Page 21

Consider revising entire Aspen section, especially based on the findings from Assessment of aspen ecosystem vulnerability to climate change for the Uinta-Wasatch-Cache and Ashley National Forests⁴.

4 Rice, Janine; Bardsley, Tim; Gomben, Pete; Bambrough, Dustin; Weems, Stacey; Huber, Allen; Joyce, Linda A. 2017. Assessment of aspen ecosystem vulnerability to climate change for the Uinta-Wasatch-Cache and Ashley National Forests, Utah. Gen. Tech. Rep. RMRS-GTR-366. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 67 p.

5 Kitchen, Stanley G.; Behrens, Patrick N.; Goodrich, Sherel K.; Green, Ashley; Guyon, John; O'Brien, Mary; Tart, David. 2019. Guidelines for aspen restoration in Utah with applicability to the Intermountain West. Gen. Tech. Rep. RMRS-GTR-390. Fort Collins CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 55 p.

For example, FW-DC-FVA-01 states that "Aspen stands may consist of one, two, or multiple age or height classes of trees." Aspen stands consisting of only one or two age or height classes are likely to not persist and is

at odds with best available science⁵.

Note that as currently drafted, the Desired Conditions are better characterized as objectives.

Consider revising Desired Conditions (FW-DC-FVA) to:

"01 The structure, function, and distribution of aspen are within the natural range of variation; there is a wide age and size class distribution of aspen and it is contributing to habitat and biodiversity.

02 Aspen stands are resilient to stressors such as disease, grazing, fire that are exacerbated by the adverse effects of climate change. Aspen is successfully regenerated from disturbances such as fires.

03 Aspen groves contribute to social and economic sustainability by supporting recreational, cultural, and economic opportunities. Aspen groves add visual interest, variety and contrasts in the landscape, providing spiritual respite and enjoyment."

Consider revising the Objectives (FW-OB-FVA) and/or Guidelines to meet the management strategies reported by Rice et al. 2017, see "Management Strategies" section and Table 4) and/or Kitchen et al. (2019).

Terrestrial Vegetation Comment 4

Page 22

Ensure Desired Conditions for pinyon-juniper woodlands do not apply to sagebrush vegetation.

Terrestrial Vegetation Comment 5

Page 22

01 Pinyon-juniper woodlands are represented across montane landscapes within its suitable thermal and precipitation zone. Colorado pinyon and Utah juniper are co-dominants, but Utah juniper becomes dominant at lower elevations[mdash]outside this zone[mdash]where environments are drier and colder. Numerous successional or structural stages are represented within the vegetation type (table 3). Plant species composition and richness is variable and dependent upon tree canopy cover, tree density, or vegetation structural stage (Huber and others 1999, Huber and Goodrich 2010). Communities are dominated by plants of moderate to high resource value, which means 60 percent or

greater in relative cover. Invasive plant species might be present, but these do not disrupt ecological processes nor diminish community resilience. Total ground cover is equal to or greater than 85 percent of potential.

Consider revising to:

"01 Numerous successional or structural stages are represented within the pinyon-juniper vegetation type (table 3). Plant species composition and richness is variable and dependent upon tree canopy cover, tree density, or vegetation structural stage (Huber and others 1999, Huber and Goodrich 2010). Communities are dominated by plants of moderate to high resource value, which means 60 percent or greater in relative cover. Invasive plant species might be present, but these do not disrupt ecological processes nor diminish community resilience. Total ground cover is equal to or greater than 85 percent of potential, based on United States Department of Agriculture Natural Resources Conservation Service Ecological Site Descriptions.

Terrestrial Vegetation Comment 6

Page 22

01 Depending upon vegetation community conditions, do one of three things: restore ecological function, integrity, and resilience; initiate upward trend; or maintain desired condition of 500 acres of burned pinyon-juniper woodlands compromised by invasive plants every 5 years during the life of the plan.

Consider revising to:

"01 Restore ecological function, integrity, and resilience; or initiate upward trend of 500 acres of burned pinyon-juniper woodlands compromised by invasive plants every 5 years during the life of the plan."

Rationale is that, as drafted, this allows selection of 500 acres of burned pinyon-juniper woodlands that are in desired condition to be "maintained" which may mean no action. As drafted, this objective may not support restoration of burned pinyon-juniper woodlands compromised by invasive plants.

Terrestrial Vegetation Comment 7

Page 22

01 Use post-treatment seeding (after activities like mechanical thinning and mastication) where invasive plant species are present or have high potential to spread into a treated area of persistent pinyon-juniper.

Consider revising to state:

01 Use post-treatment seeding after activities like mechanical thinning and mastication of pinyon-juniper.

Rationale: Vegetation treatments in pinyon-juniper have the high potential for invasion by invasive and non-desirable species and post-treatment seeding should be considered a best management practice⁶.

6 Havrilla, C., Faist, A., Barger, N., 2017. Understory Plant Community Responses to Fuel-Reduction Treatments and Seeding in an Upland Pinyon-Juniper Woodland. *Rangeland Ecology & Management* 70.

<https://doi.org/10.1016/j.rama.2017.04.002>

Terrestrial Vegetation Comment 8

Page 28

01 Restore ecological function, integrity, and resilience; move toward upward trend; or maintain desired condition of 2,500 acres (on average) annually of nonforest vegetation during the life of the plan that are threatened by conifer encroachment or invasive plants.

Consider revising to:

01 Restore ecological function, integrity, and resilience of 2,500 acres annually of sagebrush vegetation that are threatened by conifer encroachment, invasive plants, or degraded conditions.

Terrestrial Vegetation Comment 9

Page 29

Consider removing:

02 Within the Anthro Plateau land type association, change no less than 200 acres of mountain big sagebrush every 5 years during the life of the plan from 20 percent or greater canopy cover, to less than 5 percent canopy cover to enhance brood rearing and summer habitat for greater sage-grouse.

Rationale is that this is not in accordance with the metrics from current greater sage-grouse management recommendations.

Wildlife

The U.S. Forest Service has the authority to support diversity and management of wildlife, not just wildlife habitat. During the period of the Revised Plan, increasing recreation and development in the region will make the Forest even more important for wildlife in the Plan area and the region. Our comments reflect these concerns.

Wildlife Comment 1

Page 33

Plan components for the conservation of greater sage-grouse were added to the current forest plan through a plan amendment in 2015 (Greater Sage-Grouse Record of Decision, Utah Plans Amendment 2015). In 2017, the Forest Service initiated another plan amendment process to change several of those plan components to incorporate new information. The purpose was also to improve the clarity, efficiency, and implementation of the 2015 amendment. This includes better alignment with BLM and State plans to benefit greater sage-grouse conservation on a landscape scale.

Consider adding the following to the paragraph above in order to complete the timeline of events related to management of greater sage-grouse on the ANF:

"The Plan Amendment was released in August 2019. In October 2019, the U.S. District Court enjoined the U.S. Bureau of Land Management and the U.S. Forest Service from implementing the 2019 Sage-Grouse Plan Amendments. Therefore, the 2015 Amendments are reinstated for activities on U.S. Bureau of Land Management and the U.S. Forest Service lands."

We acknowledge the challenges preparing a revised Plan under these conditions. However, please revise the Plan to include Desired Conditions, Objectives, and Guidelines that are in line with the 2015 Greater Sage-Grouse Record of Decision, Utah Plans Amendment, as it is currently reinstated.

Wildlife Comment 2

Page 33

Breeding populations of federally listed threatened, endangered, proposed, and candidate species have not been documented on the Ashley. Thus, there are few specific plan components for those species.

Please revise to include specific Guidelines for the protection of suitable habitat for North American wolverine and yellow-billed cuckoo, similar to what has been done for the Canada Lynx (FW-GL-WL 11). Rationale is that the Endangered Species Act protects all or portions of suitable habitat for listed species. The Species at Risk Report states there is suitable habitat for these species, albeit that known occurrences of these species are few.

Wildlife Comment 3

Page 33

The Assessment Report identified the following species of conservation concern on the Ashley: greater sage-grouse, black-rosy finch, peregrine falcon, fringed myotis, bighorn sheep, pygmy rabbit, and Eureka mountain snail.

Please note that the Species at Risk Report lists potential wildlife and fish species of conservation concern in Table 1 that are different from the Assessment Report. Please clarify why the list differ and revise both documents accordingly.

Wildlife Comment 4

Page 34

03 The Ashley National Forest contributes to the habitat needs (feeding, breeding and sheltering) and the long-term persistence of species of conservation concern and those populations of threatened and endangered species that occur on the Ashley National Forest.

Consider revising to:

"03 The Ashley National Forest contributes to the habitat needs (feeding, breeding, sheltering) and the survival, recovery, and long-term persistence of species of conservation concern, populations of threatened and endangered species, and bald and golden eagles that occur on the Ashley National Forest. Forest conditions preclude the need for listing new species; and conditions allow for species of conservation concern and native species to be sustained."

Wildlife Comment 5

Page 34

06 Vegetation management activities and prescribed fires should avoid or mitigate known Eureka Mountain snail sites.

Consider revising to:

"06 Vegetation management activities and prescribed fires avoid known Eureka Mountain snail sites."

Rationale is that because of the rarity of this species and limited number of known sites in the ANF, mitigation for impacts to known Eureka Mountain snail sites is not likely feasible.

Wildlife Comment 6

Page 33-34

Consider adding the following Desired Conditions:

"Sustainable populations of native and desirable nonnative, plant and animal species are supported by healthy ecosystems, essential ecological processes, and land stewardship activities, and reflect the diversity, quantity, quality, and capability of natural habitats."

"Land management activities are designed to maintain or enhance sustainable populations of both common and uncommon species and consider the relationship of threats (including site-specific threats) to species survival."

"The Ashley National Forest provides for high quality hunting, fishing, and wildlife watching opportunities."

Wildlife Comment 7

Page 34

03 Vegetation management activities should avoid, minimize, or mitigate removal of known raptor nests and habitat degradation within a 30-acre buffer of the nest. This guideline does not apply to unoccupied nests unlikely

to be used in the future because the nest is in poor condition, habitat components around the nest have changed (such as by wildfire, beetle epidemic, or other natural cause) to an unsuitable condition, or if the length of inactivity indicates it is unlikely to be used. "Known raptor nests" are defined as those raptor nests that are known at the time the vegetation management activity is proposed.

Consider revising to:

"03 Vegetation management activities or disturbance to vegetation should avoid, minimize, or mitigate removal of known raptor nests and habitat degradation. No-disturbance buffers shall be based on season and species (see U.S. Fish and Wildlife Service Wyoming Ecological Field Office Recommendations for Raptors). This guideline does not apply to unoccupied nests unlikely to be used in the future based on an assessment by a qualified biologist. Prior to vegetation management activities being planned and initiated, raptor nests shall be located."

Wildlife Comment 8

Page 34-35

Consider adding the following Guidelines:

"Vegetation management activities or disturbance to vegetation shall follow best management practices to avoid and minimize impacts to migratory birds listed by the Migratory Bird Treaty Act."

Wildlife Comment 9

Page 34

In occupied pygmy rabbit habitat, vegetation management activities should be designed to maintain interconnected patches of tall dense sagebrush (average of $\frac{1}{12}$ acre in size).

Consider revising to state:

"In occupied or suitable pygmy rabbit habitat (as identified by the Wyoming Natural Diversity Database [Wyoming Game and Fish Department 2010] and The Nature Conservancy [Kiesecker et al. 2009]) vegetation management activities should be designed to maintain interconnected patches $\frac{1}{12}$ acre in size of big sagebrush (*Artemisia tridentata*) that are tall (greater than 50 centimeters) and dense (greater than 20 percent cover). 12,9,10

7 Wyoming Game and Fish Department. 2010. State wildlife action plan. Cheyenne, Wyoming Game and Fish Department. Available: http://wgfd.wyo.gov/web2011/Departments/Wildlife/pdfs/SWAP_2010_FULL_OCT0003090.pdf (October 2010).

8 Kiesecker JM, Copeland H, Pocerwicz A, Nibbelink N, McKenney B, Dahlke J, Holloran M, Stroud D. 2009. A framework for implementing biodiversity offsets: selecting sites and determining scale. *BioScience* 59:77-84.

9 Heady, Laura T. and Laundr[eacute], John W. (2005) "Habitat use patterns within the home range of pygmy rabbits (*Brachylagus idahoensis*) in southeastern Idaho," *Western North American Naturalist*: Vol. 65 : No. 4 , Article 7. Available at: <https://scholarsarchive.byu.edu/wnan/vol65/iss4/7>

10 Steve Germaine, Drew Ignizio, Doug Keinath, and Holly Copeland (2014) Predicting Occupancy for Pygmy Rabbits in Wyoming: An Independent Evaluation of Two Species Distribution Models. *Journal of Fish and Wildlife Management*: December 2014, Vol. 5, No. 2, pp. 298-314.

11 Wild Sheep Working Group. 2012. Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat. Western Association of Fish and Wildlife Agencies.

Wildlife Comment 10

Page 35

10 New permitted grazing by domestic sheep or goats should not be authorized unless: separation of domestic sheep or goats from bighorn sheep can be demonstrated, or research demonstrates risk of respiratory pathogen transfer from domestic sheep or goats to bighorn sheep can be avoided in another way, or research demonstrates respiratory pathogen transfer from domestics to bighorn sheep is no longer an issue.

Consider revising to:

"10 New permitted grazing by domestic sheep or goats should not be authorized in areas with habitat suitable for bighorn sheep"

Rationale is that it is recommended that land managers reduce risk of association by eliminating overlap of domestic sheep or goat allotments or grazing permits/tenures within wild sheep habitat.11

Social and Economic Sustainability

Social and Economic Sustainability Comment 1

Page 36

01 Key Ashley National Forest services contribute to the quality of life and sense of place for both present and future generations. These services include availability of forest products, support of aquatic and terrestrial ecosystems, clean air and water, aesthetic values, cultural heritage values, and recreation opportunities.

Consider revising to:

"01 Key Ashley National Forest services contribute to the quality of life and sense of place for both present and future generations. These services include support of aquatic and terrestrial ecosystems, clean air and water, aesthetic values, cultural heritage values, and recreation opportunities."

Rationale: FW-DC-SE 02 includes a full list of "extractive" resources including forest products, timber, energy resources, livestock forage, and infrastructure.

Social and Economic Sustainability Comment 2

Page 36

01 Develop memoranda of agreements or other protocols between the Ashley National Forest and local governments as appropriate to guide coordination processes and reflect local perspectives and interests.

Consider revising to:

"01 Develop memoranda of agreements or other protocols between the Ashley National Forest and local and state governments as appropriate to guide coordination processes and reflect local and regional perspectives and interests."

Livestock Grazing

Livestock Grazing Comment 1

Page 45

01 Sustainable rangelands provide forage for livestock grazing opportunities that contribute to the agricultural economy and, local employment, and support traditional lifestyles, cultural values, and generational ties to the land.

02 Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas.

Consider revising to:

"01 Sustainable rangelands provide forage for livestock grazing opportunities that contribute to the agricultural economy and, local employment, and support rural landscape, traditional lifestyles, cultural values, and generational ties to the land.

02 Livestock grazing and associated management activities are compatible with ecological functions and processes and the management of social resources, including designated areas."

"03 Forage, browse, and cover meet the needs of wildlife, and authorized livestock are managed in balance with available forage. Areas that are grazed have, or are trending toward having, satisfactory soils, functional hydrology, and biotic integrity."

Livestock Grazing Comment 2

Page 45

Guidelines (FW-GL-LGR)

01 Utilization of key forage species should be no greater than 50 percent of current year's growth, except where long-term monitoring demonstrates a different allowable use level that will meet desired conditions for soils and terrestrial vegetation.

02 Leave a four-inch or greater stubble height of herbaceous species at the end of the grazing season between greenline and bankfull of stream systems, except where long-term monitoring demonstrates a different stubble height that will meet desired conditions for soils, watershed, aquatic ecosystems, and riparian ecosystems.

Consider a revision of the Guidelines to consider the following resources and themes. We are most concerned about impacts to riparian and wetland habitats as a result of livestock grazing. Please update the utilization rate and stubble height guidelines. Consider further inclusion of mule deer, moose, and elk forage needs when determining livestock animal unit months on key winter range, migration routes, holding areas, and fawning areas. Please see the following resources when seeking input on revisions: Collaborative Group on Sustainable Grazing For U.S. Forest Service Lands in Southern Utah (201212), Straube (201713), Avertt et al. (201914), Clarry and Leininger (200015), Winward (200016), Hall and Bryant (199517), and Carter et al. (201118). We

also find the library of research at University of California Rangelands¹⁹ applicable to the ANF.

12 Collaborative Group on Sustainable Grazing for U.S. Forest Service Lands in Southern Utah. 2012. Final Report and Consensus Recommendations, December 2012. Accessed at:

<https://ag.utah.gov/documents/SustainableGrazingSoUtForests.pdf>

13 Straube, M. 2017. Collaborative groups related to sustainable grazing on public lands. *Human-Wildlife Interactions* 11(3):311-319, Winter 2017

14 Averett, J. P., Michael J. Wisdom, Bryan A. Endress. 2019. Livestock Riparian Guidelines May Not Promote Woody Species Recovery Where Wild Ungulate Populations Are High. *Rangeland Ecology & Management* 72 (2019) 145-149

15 Clary, W.P, and W. C. Leininger. 2000. Stubble height as a tool for management of riparian areas. *Journal of Range Management*. 53: 562-573.

16 Winward, Alma H. 2000. Monitoring the vegetation resources in riparian areas. Gen. Tech. Rep. RMRS-GTR-47. Ogden, UT: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 49 p.

17 Hall, F.C., and L. Bryant. 1995. Herbaceous Stubble Height as a Warning of Impending Cattle Grazing Damage to Riparian Areas. United States Department of Agriculture Forest Service Pacific Northwest Research Station General Technical Report PNW-GTR-362 September 1995.

18 Carter, J., et al. 2011. in Monaco, T.A. et al. comps. *Proceedings - Threats to Shrubland Ecosystem Integrity*; 2010 May 18-20; Logan, UT. Natural Resources and Environmental Issues, Volume XVII. S.J. and Jessie E. Quinney Natural Resources Research Library, Logan Utah, USA.

19 <http://rangelands.ucdavis.edu/>

We find the Inyo National Forest's approach to livestock and rangeland grazing to provide more clear Desired Conditions, Objectives, and Monitoring metrics, and are more in line with best available science. Recent literature has generally found that the 50% livestock grazing utilization threshold is often too high to ensure persistence and resiliency of many native perennial bunchgrass communities, especially in times of drought. Consider revising the ANF Plan to include specific utilization Standards and Guidelines for each grazing vegetation type.

Please consider the following vegetation

types, at minimum: wet meadow, moist meadow, dry meadow, sagebrush, subalpine meadow, aspen, and willow. Please refer to the document *Rangeland Management Supplemental Report Inyo National Forest Supplement to USDA Forest Service Pacific Southwest Region Rangeland Analysis and Planning Guide R5-EM-TP-004* when revising the Livestock Grazing section.

Livestock Grazing Comment 3

Page 45

Consider revising the Guidelines to include:

"Grazing after fire (planned and unplanned ignitions) should be managed so as not to cause a trend away from the native or desired nonnative species desired condition. This may include deferment for one or more growing seasons following unplanned fire, which will be defined at the project level when restoration needs are assessed."

"All new water developments shall provide for small mammal and bird escape and should be bat-friendly."

"All new or replacement fencing shall be wildlife friendly and allow the safe passage of both large and small wildlife species."

Energy and Minerals

Energy and Minerals Comment 1

Page 47

01 Exploration and development of energy and mineral resources contribute jobs, income, and raw materials to the local and national economy.

02 Environmental impacts from energy and mineral exploration and development activities are effectively avoided, minimized, or mitigated, consistent with valid existing rights.

Consider revising to

"01 Exploration and development of energy and mineral resources provide for public benefit, while avoiding and minimizing adverse environmental effects are compatible with protecting ecosystem integrity."

Energy and Minerals Comment 2

Page 48

07 Lands developed for mineral or energy resources (including locatable, leasable, and salable materials, and energy resources) are reclaimed in an appropriate manner when those lands are no longer needed for exploration, development, or production of mineral or energy resources.

08 Abandoned mineral or energy development sites are identified and returned to environmental conditions comparable to the surrounding area or conditions that existed prior to development.

Consider revising to:

"Plans of operation for energy and mineral development and (including locatable, leasable, and salable materials, and energy resources) shall include reclamation plans and reclamation bonds that address the costs of: removing facilities, equipment, and materials; isolating and neutralizing or removing toxic or potentially toxic materials. The reclamation plans shall include plans for restoration of the site to environmental conditions that are comparable to the natural surrounding area."

Energy and Minerals Comment 3

Page 47

Consider adding the following Guideline:

"Any development of wind energy and associated infrastructure within the Plan Area will consider and mitigate negative impacts to wildlife per the 2012 U.S. Fish and Wildlife Service's Land-Based Wind Energy Guidelines."

Energy and Minerals Comment 4

Page 48

01 New mineral material disposals or developments (for discretionary saleable minerals such as sand, stone, gravel, and clay) should not be authorized within the following areas, to protect the values for which those areas were created: Designated or recommended wilderness areas; Research natural areas; Within 500 feet of developed recreation or administrative sites, except as needed for internal Forest Service use.

Consider revising to:

"01 New mineral material disposals or developments (for discretionary saleable minerals such as sand, stone, gravel, and clay) shall not be authorized within the following areas, to protect the values for which those areas were created: Designated or recommended wilderness areas; Research natural areas; Within 500 feet of developed recreation or administrative sites (except as needed for internal Forest Service use); or within Riparian Management Zones."

Geologic Resources and Hazards

Geologic Resources and Hazards Comment 1

Page 50

05 Caves and other underground habitats provide undisturbed habitat for native bat species during the critical periods of maternity and hibernation. Caves and other underground habitats also provide undisturbed habitat for other cave-dependent terrestrial or aquatic species.

Consider revising to:

"05 Caves and other underground habitats provide undisturbed habitat for native bat species during the critical periods (e.g., maternity, hibernation, migration). The threats of white-noise syndrome to bats are reduced through best management practices. Caves and other underground habitats also provide undisturbed habitat for other cave-dependent terrestrial or aquatic species."

Transportation

Transportation Comment 1

Page 51

Consider adding the Desired Conditions:

"Both nonmotorized and motorized use is managed to respect ecological systems, including wildlife, and different user groups."

"Roads allow for safe and healthy wildlife movement throughout the Forest. Vehicular collisions with wildlife are minimized and rare."

Transportation Comment 2

Page 52

08 The creation of unauthorized roads and trails are prevented through Forest Service education, enforcement,

and partnerships with its users.

Consider revising to:

"08 The creation of unauthorized roads and trails are prevented through Forest Service education, enforcement, and partnerships with its users. Unauthorized roads and trails will be closed and revegetated."

Transportation Comment 3

Page 53

03 Consider impacts to streams when constructing, reconstructing, or maintaining roads. Where practical, implement mitigation that reduces sediment delivery to streams.

Consider revising to:

"03 Consider impacts to streams when constructing, reconstructing, or maintaining roads and implement mitigation that reduces sediment delivery to streams."

Recreation

Recreation Comment 1

Consider changing the title of this section to 'Sustainable Recreation' to acknowledge the terminology used in the U.S. Forest Services' Framework for Sustainable Recreation and the Preliminary Need to Change the Ashley National Forest Land Management Plan.

Note that the Recreation section contains many Desired Conditions, but very limited Objectives and Guidelines. Please revise to provide more detail on ways to achieve the Desired Conditions.

Recreation Comment 2

Note that wildlife is important to recreation users at the National Forests and 28.6% of users participated in "wildlife viewing" at National Forests from 2012-2016. The

20 U.S. Forest Service. U.S. Forest Service National Visitor Use Monitoring Survey Results National Summary Report

Data collected FY 2012 through FY

2016. <https://www.fs.fed.us/recreation/programs/nvum/pdf/5082016NationalSummaryReport062217.pdf> experience of this activity depends on proper management of wildlife and wildlife habitats.

Recreation Comment 3

Page 55

09 Semi-primitive motorized winter settings provide backcountry skiing and snowmobiling opportunities. Routes are typically ungroomed, but are often signed and marked. There are vast areas to travel cross-country, offering visitors an opportunity for exploration and challenge. Occasionally, historic cabins or yurts are available for short breaks or overnight use.

Consider revising to state:

"09 Semi-primitive motorized winter settings provide backcountry skiing and snowmobiling opportunities. Routes are typically ungroomed, but are often signed and marked. There are vast areas to travel cross-country, offering visitors an opportunity for exploration and challenge. Occasionally, historic cabins or yurts are available for short breaks or overnight use. Motorized winter use does negatively impact habitats critical for wintering wildlife."

Create a Guideline to support implementation of this desired condition.

Recreation Comment 4

Page 60

01 Recreation events provide opportunities to participate in competitions or highlight special occasions.

Consider revising to:

"Special (recreation) events are consistent with recreation settings, protect natural resources, cultural resources, and contribute to the economic sustainability of local communities."

Recreation Comment 5

Page 60

01 New recreation technologies contribute to visitor enjoyment and experiences, are consistent with recreation settings, and still allow for the enjoyment of other existing recreational opportunities.

Consider revising to:

"01 New recreation technologies contribute to visitor enjoyment and experiences, are consistent with recreation settings, allow for the enjoyment of other existing recreational opportunities, and do not negatively impact wildlife

or other natural resources."

Visitor Education and Interpretation

Visitor Education and Interpretation Comment 1

Page 61

Consider adding a new section or adding content about volunteers, partnerships and stewardships.

Visitor Education and Interpretation Comment 2

Page 61

Consider adding the following Desired Conditions:

"The Forest has a network of dependable partners and volunteers who provide additional capacity to effectively and efficiently meet plan desired conditions and deliver services to the public."

"The Forest uses partnerships to build local capacity for providing information and content using the best available methods, including, but not limited to, advances in technology."

"Forest Service projects and management actions, as well as the importance of ecosystem services, are communicated to the public in an understandable fashion to increase public awareness of nature and ecosystems."

Visitor Education and Interpretation Comment 3

Page 61

Consider adding the following Objectives:

"Work with neighboring communities, organizations, state and local agencies, tribes, and other federal agencies to sustain forest benefits to people across the broader landscape."

"Regularly design, fund, and report potential projects suitable for partnership and volunteer opportunities to the public."

"Work with site stewards, volunteers, tribal governments, local governments, state and federal agencies, schools and universities and non-profit groups to protect, rehabilitate and restore aquatic and terrestrial ecosystems."

Lands Special Uses

Lands Special Uses Comment 1

Page 64-65

Consider adding the following Desired Condition:

"Special uses contribute to ecological, social, and economic desired conditions consistent with law, regulation, and policy."

Protection Fire Management Area

Protection Fire Management Area Comment 1

Page 82

02 During the first 5 years of the plan, promote collaboration with private industry and outside interests to increase the percentage of fire resilient landscapes within the Protection Fire Management Area. Annually treat a minimum of 1,000 to 3,000 acres (based on current funding and capacity).

Consider revising to:

"02 Throughout the plan, promote collaboration with private industry and other interests to increase the percentage of fire resilient landscapes within the Protection Fire Management Area and Forest. Annually treat a minimum of 3,000 acres in the Protection Fire Management Area in order to create more fire resilient vegetation communities."

Monitoring

We note that monitoring is very important and needs to be fully developed, funded, implemented, and designed in a way they can inform adaptive management. In order to protect viable populations of species of conservation concern, and maintain and achieve Desired Conditions, monitoring on the ANF is critical. We also see a strong Monitoring Plan as an opportunity for the ANF to collaborate and partner with stakeholders. Wild Utah Project is very interested in providing additional capacity to support development of the Focal Species and Monitoring Plan.

Monitoring Comment 1

The identification of Forest Focal Species are important for effective monitoring. Currently the Plan only identifies one Focal Species: aspen. We believe that one Focal Species is not appropriate enough to monitor the health and integrity of the ANF. Please consider developing a list of Focal Species that represent the integrity of the ANF's important ecosystems.

Along with selection of appropriate Focal Species, we ask the ANF to consider assigning a priori trigger points in their Monitoring Plan. Trigger points will prompt a management response or review of the management decisions. While this is not an exhaustive list, Focal Species for the following ecosystems and Desired Conditions should be considered: stream and riparian, wetlands, landscape connectivity, aspen, sagebrush, alpine.

We recognize the selection of Focal Species requires careful thought. For example, even if a species is a good representation of the integrity of an ecosystem, it still must be abundant enough to effectively monitor and be able to make statistical inferences. There are several helpful documents related to the use and selection of Focal Species. We ask the ANF to consider the recommendations and guidelines in the following resources: Noon et al. (2009)²¹, Schultz et al. (2013)²², Hayward et al. (2016)²³, and National

²¹ Noon, B. R., K. S. McKelvey, and B. G. Dickson, 2009. Multispecies conservation planning on U.S. federal lands. Pages 51-84 in J. J. Millspaugh and F. R. Thompson, III, editors. Models for planning wildlife conservation in large landscapes. Academic Press, New York, New York, USA. Available online at:

https://www.sierraforestlegacy.org/Resources/Conservation/Biodiversity/BD-Noon-et-al_2009.pdf

²² Schultz, C.A. 2013. Wildlife Conservation Planning Under the United States Forest Service's 2012 Planning Rule. Journal of Wildlife Management 77(3):428-444. DOI: 10.1002/jwmg.513

²³ Hayward, G. D., C. H. Flather, M. M. Rowland, R. Terney, K. Mellen-McLean, K. D. Malcolm, C. McCarthy, and D. A. Boyce. 2016. Applying the 2012 Planning Rule to conserve species: a practitioner's reference.

Unpublished paper, USDA Forest Service, Washington, D.C., USA.

Advisory Committee for Implementation of the National Forest System Land Management Planning Rule (2018)²⁴.

²⁴ National Advisory Committee for Implementation of the National Forest System Land Management Planning Rule. 2018. Final Recommendations to the Secretary of Agriculture and the Chief of the Forest Service - February 3, 2018.

²⁵ Stacey, P.B, A.L. Jones, J.C. Catlin, D.A. Duff, L.E. Stevens, and C. Gourley. 2006. User's Guide for the Rapid Assessment of the Functional Condition of Stream Riparian Ecosystems in the American Southwest

We feel creation of a list of Focal Species is beyond the scope of our capacity for this Public Comment period.

We ask that the ANF consider holding a workshop or other public meeting with their staff biologists and other interested stakeholders to identify Focal Species and fully develop the Monitoring Plan. We, as an organization involved with using Citizen Scientists to collect data on other rare species of concern in Utah (i.e. black rosy finch and boreal toad), would be interested in being involved with such a workshop for the ANF.

Monitoring Comment 2

Page 87, Table 20

We note under Terrestrial Vegetation there are detailed ecological indicators for sagebrush habitat (i.e., conifer encroachment), please provided detailed indicators for other vegetation communities.

Monitoring Comment 3

Page 88, Table 20

Please consider updating the monitoring question and indicators for "Wildlife, TEPC species and species of conservation concern" to acres of occupied habitat, number in population, or another metric that directly relates to the presence of the species of interest.

Monitoring Comment 4

Page 88, Table 20

Please consider defining what the "Wildlife, species of interest" are and provide specific indicators for each species.

Monitoring Comment 5

Page 88-89, Table 20

For all wildlife related topics, please consider adding "Forest Species-specific Monitoring and Studies" and "Species Monitoring Studies Conducted in Collaborations with Partnerships" in the "Potential Data Sources."

Monitoring Comment 6

Page 88-89, Table 20

We have found stream and riparian condition monitoring using the Rapid Stream Riparian Assessment²⁵ is an effective method for our restoration and program work. Consider if this is appropriate for monitoring on the ANF.

Sincerely,

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