



State of Utah

Department of
Natural Resources

Division of
Wildlife Resources

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February 2, 2004

Fishlake National Forest
Attn: Diane Freeman
South Fork Vegetation Treatment Project Team Leader
115 East 900 North
Richfield, UT 84701

Subject: RDCC Project #3638; USDA/Forest Service – Fishlake National Forest: East Fork South Fork Vegetation Treatment Project

Dear Ms. Freeman:

The Utah Division of Wildlife Resources (UDWR) has reviewed the proposed South Fork Vegetation Treatment Project. We provide the following comments for your consideration.

The UDWR compliments the Beaver Ranger District of the Dixie National Forest for its attempts to establish a diverse vegetative stand composition and structure composed of a mosaic of native plant communities in the project area. This proposed project would conduct salvage and sanitation treatments on approximately 2000 acres of dead or at risk Engelmann spruce and subalpine fir forest.

The UDWR has the following issue-specific recommendations on the proposed action:

- Ecosystem restoration relies on certain presumptions concerning historical landscape conditions. Therefore, the historical basis for restoration, and the anticipated alterations to landscape structure and composition, biogeochemical processes and the disturbance regime should be clearly evaluated prior to project implementation: these include changes to tree density, floor depth and fuel loading; soil moisture and nutrient availability; growth and diversity of both woody and herbaceous plants; tree mortality; stream and spring flows; and the spatial and temporal characteristics of the fire regime. This evaluation will require a landscape-scale reconstruction of past forest structure and fire disturbance history in the project area.
- Importantly, the project area contains high-priority summer range for mule deer, elk, Merriam's wild turkey and Rio Grande wild turkey, yearlong habitat for blue grouse and snowshoe hare, and habitat for numerous small

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birds, cavity nesters, small mammals and raptors. Therefore, we suggest that the Forest Service use information about wildlife movement patterns, distribution and concentration to plan timing of timber cuts and placement of roads. For protection of deer and elk, we recommend leaving visual tree buffers along roads, and preserving tree cover for travel corridors, especially along ridges and forest rims, and adjacent to riparian areas. Large spruce and fir trees along ridge lines and rim areas are important wintering sites for blue grouse and should be conserved. Depending on tree density, protection corridors should be 100 to 300 feet wide.

- In addition to the species listed above, two cavity nesters, the northern flying squirrel (*Glaucomys sabrinus*) and three-toed woodpecker (*Picoides tridactylus*), are found in the project area. The latter is on the *Utah Sensitive Species List*. UDWR supports the retention of snags and downed wood in the treatment areas at historical densities set for each particular vegetative community. These landscape components provide valuable habitat for these cavity nesters and other birds, mammals, amphibians, reptiles and insects.
- We suggest that riparian areas along perennial streams be protected with a 100-foot no-treatment buffer. Riparian areas along ephemeral streams could be thinned, but piling and burning should occur at least 50 feet away from channels. Also, heavy disturbance and stream clearing may be as damaging to forests as fire suppression and should be prohibited unless proven effective and beneficial as part of the broader restoration project.
- Ward's Cache Pond is stocked yearly with Bonneville Cutthroat Trout by the UDWR. We request that precautions be taken to preserve water quality and yield in this Pond.
- The UDWR strongly supports a reduction in road density in the treatment area. In particular, this vegetative management project will provide a tremendous opportunity to analyze the existing road network, decommission excess roads after treatment, and reclaim these closed roadbeds with native vegetation. We recommend that road densities in the project analysis area be set at or below the Fishlake National Forest Land and Resource Management Plan guideline of two miles of road per square mile (*Dixie and Fishlake Roads Analysis Report, Forest Wide Roads Analysis, Draft 11/08/02*). We suggest that gates be used to close any decommissioned roads in the project area to ensure proper rehabilitation of vegetation.
- The control of noxious and invasive plant species is essential for the protection and enhancement of wildlife habitat. These species can alter plant communities, with a subsequent decline in the presence of native species and a resultant change in critical ecosystem processes. Importantly,

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activities that result in surface disturbance can increase the rate of invasive species establishment.

- If livestock graze the treatment areas, we recommend a rest from this livestock grazing for at least two growing seasons, and the implementation of a rest-rotation grazing prescription that will allow grasses to grow throughout the spring during rest years and put energy into root systems and seed. Grazing reform on the appropriate allotments must include cooperative agreements to provide monitoring of range conditions and utilization rates.
- At the conclusion of this rest period, the treatment areas should be reevaluated for herbaceous recovery and overall range readiness before any resumption in grazing. We encourage the Forest Service to include specific time frames for the achievement of these objectives, with requirements to revise plans when applicable.
- Decommissioned, reseeded roads could provide additional foraging sites for blue grouse, wild turkey and neotropical migratory songbirds by using a mixture of large-seeded grasses and green forage preferred by gallinaceous birds. Seeding suggestions can be provided by UDWR.
- A raptor clearance should be conducted by your biologists to locate and protect any nest sites of various hawks and owls. Appropriate buffer zones around any nest sites should be provided. Cutting and hauling activities should be limited or eliminated between 2/15 - 7/15 to protect the main period of nesting and young-rearing for birds and mammals.
- This restoration project will also provide ample opportunity to monitor the responses of vegetative structure, species composition, and wildlife to changes in the larger landscape mosaic. The following plant community characteristics should be evaluated prior to the treatments and monitored following the treatments: cover and nested frequency for grass, forb and shrub species, vegetation, litter, rock, pavement, cryptogams and bare ground; shrub density; shrub age class distribution; shrub form and vigor; shrub height and crown dimensions; tree density and tree age class distribution; soil depth; soil temperature and soil chemistry. In addition, this project could provide a basis for the development of sampling regimes to detect changes in the density and occurrence of habitat and wildlife species diversity across different trophic levels.

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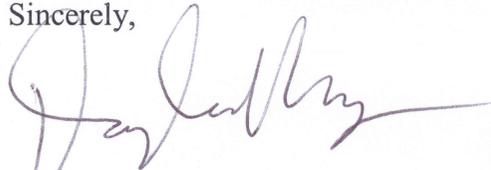
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UDWR looks forward to working with the Forest Service in the identification of critical wildlife habitat and lifecycle issues in future vegetative management projects.

Thank you for the opportunity to review this proposed management project and provide comment. If you have any questions, please contact Donald Auer, Habitat Biologist, in our Cedar City office (435-865-6112).

Sincerely,

A handwritten signature in dark ink, appearing to read "Douglas Messerly", with a long horizontal flourish extending to the right.

Douglas Messerly
Regional Supervisor

DM/dpa

cc: Val Payne, UDNR
Mike Canning, UDWR
Bruce Bonebrake, UDWR
Sean Kelly, UDWR