USDA United States Department of Agriculture | Forest Service | San Juan National Forest | 15 Burnett Court Durango, CO 81301

File Code: 1920
Date: May 19, 2016

Dear Interested Party,

I am approving the administrative changes to *Chapter Four: Monitoring Plans* of the 2013 San Juan National Forest Land and Resource Management Plan (Forest Plan) to comply with the requirements of the 2012 National Forest System Land Management Planning Rule (2012 Planning Rule).

The 2012 Planning Rule, codified at 36 Code of Federal Regulations Part 219 (36 CFR 219), requires all National Forests to update their respective monitoring plans and to consider public comment on the proposed changes. The revised Monitoring Plan and supporting information can be found at:

San Juan National Forest Revised Monitoring Plan:
http://www.fs.usda.gov/detail/sanjuan/landmanagement/planning/?cid=stelprdb5432707

2012 Planning Rule:
http://www.fs.usda.gov/detail/planningrule/home/?cid=stelprdb5359471

The modifications to the Monitoring Plan are being conducted under the administrative change procedures at 36 CFR 219.13(c), and are not subject to appeal, objection, or other administrative review.

Background

The 2012 Planning Rule requires that monitoring items appear in the form of a question and that monitoring indicators are developed to address each question posed. Monitoring items should incorporate best available scientific information, but need to remain within the fiscal and technical capabilities of the affected National Forest. The Planning Rule also requires that forest plan monitoring be reported biennially (every two years), starting from the date of the monitoring plan transition.

Questions and indicators contained in the San Juan National Forest's proposed Monitoring Plan were developed by an interdisciplinary team to inform the management of resources by 1) testing relevant assumptions; 2) tracking relevant changes; and 3) measuring management effectiveness and progress toward achieving or maintaining the desired conditions or objectives in the Forest Plan. Monitoring questions and indicators were also developed to address the eight monitoring categories outlined in the 2012 Planning Rule at 36 CFR 219.12(a)(5).

As we developed the proposed Monitoring Plan, we reevaluated existing monitoring items contained in the Forest Plan and considered new items that more effectively address the Forest Plan's desired conditions and objectives. Several existing monitoring items were removed because they are ineffective or too expensive to consistently implement. Some monitoring items have been retained with modification and others are newly added with the goal of more

accurately and efficiently monitoring changes to National Forest System lands within the San Juan National Forest.

Public Comments and Forest Service Responses

A 30-day solicitation for public comments on the proposed Monitoring Plan ran from March 22 to April 22, 2016. The proposed Monitoring Plan was posted on the San Juan Forest Plan website, notification was sent to the Forest Plan mailing list, and letters were sent to the San Juan National Forest's 26 consulting tribes. The San Juan National Forest received two comment letters, which did result in some changes to the Monitoring Plan. Comments and responses are provided in the table below.

Comment	Forest Service Response
Comments from Intermountain Forest Association	
Monitoring Category ii, Question 1: this monitoring question, the desired conditions and objectives, and the indicators mix several related, but different, details of forest plan monitoring. We recommend rewording Question 1 to: "Is the San Juan NF moving toward desired forest conditions?" We recommend adding the following as Question 2: "What are the status and trends of insects and disease in the SJNF?"	The suggested revisions essentially break one monitoring question into two separate questions, and drop the mention of old-growth monitoring. Due to high local public interest in the condition of old-growth stands within the SJNF, we have retained mention of this resource in the monitoring question, and we feel the resources are sufficiently related to warrant combining them in one monitoring question.
Monitoring Category ii, Question 1: We recommend retaining Desired Condition DC 2.2.6 as written, and deleting DC 2.2.7, since the forest conditions in DC 2.2.7 are already included in DC 2.2.6 and Table 2.2.1.	Because monitoring of old-growth stands is explicitly stated in the monitoring question, it is appropriate to retain DC 2.2.7.
Monitoring Category ii, Question 1: We recommend rewording the Indicator as "Trends in Habitat Structural Stages" and adding the following indicator: "Trends in mortality from insects, diseases, and fire."	The indicators have been revised as suggested. Trends in habitat structural stages may be measured on a less frequent basis because of the slow rate of change typical for structural stages, or as needed based on major events such as a disease outbreak or fire.
Monitoring Category ii, Question 1: We recommend adding the following Desired Condition: "2.2.9 Terrestrial ecosystems, including habitat for special status plant species, are productive, sustainable, and resilient, and provide goods and services over the long-term."	This Desired Condition has been added to the monitoring plan.
Monitoring Category iii: We recommend adding a focal species for early to mid-successional forests and the habitat provided by those forest conditions. 219.9 requires that forest plans provide for the diversity of ecosystems and habitat types, therefore, the monitoring plan should include a mechanism for monitoring that diversity of ecosystems and habitat types.	The SJNF is currently in the process of identifying focal species as required by the 2012 Planning Rule. This will be finalized through a forest plan amendment. Because a decision identifying focal species has not yet been approved, some of the Forest Plan's current management indicator species are still referenced in the Monitoring Plan. The Monitoring Plan will be revised when a decision identifying focal species is approved.
Monitoring Category iv, Question 1: Since there is no requirement in the 2012 Planning Rule that all wildlife populations are viable, the monitoring plan should not include that as a monitoring question. Further, there is a disconnect between Monitoring Question 1, the Desired Conditions and Objectives, and the indicators, and we	The 2012 Planning Rule does require that the monitoring plan contain a monitoring question addressing "the status of a select set of the ecological conditions required under § 219.9 to contribute to the recovery of federally listed threatened and endangered species, conserve

recommend you rework those.	proposed and candidate species, and maintain a viable population of each species of conservation concern" (36 CFR 219.12[a][5][iv]).
Monitoring Category iv: Since sensitive species are not a forest plan requirement, the forest plan monitoring plan should not include a requirement to monitor sensitive species.	The species that would be considered "sensitive species" in Monitoring Category iv could also qualify as species of conservation concern, which the 2012 Planning Rule requires be addressed in the Monitoring Plan (see 36 CFR 219.12[a][5][iv]). The San Juan will designate specific species as "species of conservation concern" at a later date.
Monitoring Category iv, Question 3: We recommend rewriting Question 3 as "Do management actions contribute to the recovery of Canada lynx?" Further, we are not convinced that monitoring a combination of early successional conifer forests and late seral spruce-fir forests will indicate anything about lynx recovery. The problem with monitoring for just early successional conifer forests and late seral spruce fir is that neither of those forest conditions is static. Early successional conifer forests don't stay early successional forever and late seral spruce-fir forests are subject to numerous disturbance events. We recommend monitoring for a mosaic of habitat conditions, as generally contained in SRLA VEG 01. We also recommend that the Indicators be rewritten to recognize that the SRLA direction for lynx habitat includes specific habitat levels, and does not require maximizing either early successional conifer or late seral spruce fir, and certainly not both.	We have revised this monitoring question to tie specifically to guidance for the management of lynx habitat. We have changed our monitoring indicator to remove reference to early successional and late seral spruce-fir forests. The forest will be evaluating the extent of a mosaic of habitat types used by lynx during periodic review and update of our forest-wide lynx habitat maps.
Monitoring Category vii, Question 3: We concur with monitoring forest management outputs, especially timber products.	Thank you for your comment.
Monitoring Category vii, Question 4: We recommend rewording as: "Is fire being effectively used to achieve desired conditions?" We recommend adding the following as indicators: Number of naturally ignited wildfires not managed for resource benefit, number of acres burned by fires managed for resource benefit, number and acres of prescribed fire, and how fire effectively contributed to achieving desired conditions.	We agree that the suggested revisions help clarify this monitoring question and make it more meaningful. This monitoring question has been revised to reflect the essence of the commenter's suggestions.
Colorado Parks and Wildlife	
Two Desired Conditions associated with the MIS species elk are missing from the Monitoring Plan. These are important Desired Conditions for elk management across the forest. We would like to see Indicators developed for these two desired conditions in the Monitoring Plan.	The SJNF is currently in the process of identifying focal species as required by the 2012 Planning Rule. These focal species will effectively replace MIS species, although there may be some overlap. This will be finalized through a forest plan amendment. Because a decision identifying focal species has not yet been approved, some of the Forest Plan's current management indicator species are still referenced in the Monitoring Plan. The Monitoring Plan will be revised when a decision identifying focal species is approved.

Approval of Monitoring Transition

Based on the proposed Monitoring Plan transition discussed in my March 22, 2016 letter requesting public comment, the comments that were received, and changes suggested by the San Juan National Forest interdisciplinary team, I approve the administrative changes to *Chapter Four: Monitoring Plans* of the 2013 San Juan Forest Plan. The new Monitoring Plan now aligns with the 2012 Planning Rule. The attached changes replace the San Juan National Forest monitoring portion of Chapter 4 of the Forest Plan in its entirety.

If you have questions about these administrative changes or would like more information, please contact Mark Lambert (mblambert@fs.fed.us; 970-385-1240). Thank you for your interest in the management of the San Juan National Forest.

Sincerely,

Kara L Chadwick

KARA L. CHADWICK
Forest Supervisor

Attachment