

# Response to Comment, Apache-Sitgreaves National Forests Monitoring Transition

Apache-Sitgreaves National Forests  
Springerville, Arizona, June 21, 2016

## INTRODUCTION

The Apache-Sitgreaves National Forests (ASNFs) have begun implementing their newly revised Land Management Plan, which was written under the terms of the 1982 Planning Rule. Because of a requirement in the Forest Service's new 2012 Planning Rule, we recently proposed changes to the monitoring chapter of our plan that will bring it into compliance with the new Rule. To present and explain the proposed changes, we produced a document entitled "Monitoring Transition Proposed Changes" and developed a "Monitoring Transition White Paper," both of which were published on our website on April 19, 2016. We requested public comment on these changes until May 19, 2016. This Response to Comments documents the Forests' consideration of comments received and changes we made in response.

## COMMENTERS

We received 13 comments from members of the public (Table 1) during the comment period. An additional comment was received from the San Carlos Apache Tribe after the end of the comment period. It is also addressed here. A number of the issues brought forward by commenters were unrelated to monitoring transition, but instead addressed other aspects of the management of the forests, implementation of the plan, or other issues. Because this comment period was specific to monitoring transition issues, those comments are not addressed in this document. Comments relevant to other aspects of the management of the forests have been forwarded to the appropriate officials for consideration during project-level planning and decisionmaking.

## CONTENT ANALYSIS PROCESS

We assigned a unique commenter code to each letter or email (Table 1). We then identified all relevant comments in each letter and email and grouped similar comments together. Finally, we summarized each group of similar comments in a concern statement. Concern statements below are followed by the commenter codes of all commenters who raised the same issue. Forest Service responses follow each concern statement.

**Table 1. List of commenters with commenter codes and the commenter's organization (if any).**

Commenter Code	Commenter	Organization
01	Michele Anderson	
02	Dave Dorum	Arizona Game and Fish Department
03	LeeAnn Bennett	
04	K. R. Gregg	
05	Jim Holder	Holder Ranch
06	William Josephs	
07	Ken and Shelley Moore	
08	Sherry Oster	

Commenter Code	Commenter	Organization
09	Ryan Reinhold	
10	Rebecca Rodrigues	Tucson Electric Power
11	R. J. Sauer	
12	Shielda Trotter	
13	Spencer Vermuele	
14	Vernelda J. Grant, THPO	San Carlos Apache Tribe

## ISSUES

**Concern Statement: Monitoring needs to be annual, not periodic (2, 5, 10-year intervals) in order to catch unfavorable trends in time to correct them. (01, 04, 08)**

**Response:** The ASNFs' updated Monitoring Strategy has 33 questions with a mix of measurement/evaluation intervals. Of these 33, 13 are measured annually, 4 are measured biennially, 15 are measured every 5 years, and 1 is measured every decade. These different intervals were chosen for several reasons. Annual monitoring intervals were set for resources whose status can change rapidly and for which managers can address concerns relatively quickly. Annual monitoring is required, for example, for soil health and productivity, trends in threatened and endangered species habitats, trends of ecological indicators and focal species, and effects of recreational use on natural resources.

Biennial and 5-year evaluation intervals were set for some resources requiring annual data collection but for which periodic evaluation was deemed sufficient to detect and, if necessary, address, trends away from desired conditions. Generally, these are variables that change more slowly and for which annual evaluations are not necessary for detecting trends. Examples include questions related to reforestation, recreation infrastructure, and timber sales.

Answering other questions with monitoring intervals longer than 1 year requires ASNFs to use external data sources that are only updated at longer intervals. Examples of these include questions relying on mid-scale vegetation assessments, which are conducted periodically, and those that rely on climate change vulnerability assessments, which are planned on a 5-year cycle.

In response to this concern, we added the following statement to the Monitoring Strategy section of the Monitoring Strategy chapter: "Monitoring intervals were chosen based on data availability and rate of change of variables to be measured. Some questions with evaluations occurring at monitoring intervals longer than 1 year may require annual data collection." We also made the following change to the column 3 header in table 12: replace "Frequency of Measurement" with "Monitoring Interval."

**Concern Statement: Monitoring needs to be tied to management changes to be effective. (01, 04, 05)**

**Response:** Monitoring is part of adaptive management, and is therefore tied by Forest Service regulations (36 CFR 219.12) (USDA-Forest Service, 2012) to management actions. The 2012 Planning Rule states that "[t]he responsible official shall develop a monitoring program for the plan area and include it in the plan. Monitoring information should enable the responsible official to determine if a change in plan components or other plan content that guide management of resources on the plan area may be needed." (36 CFR 219.12(a)(1)) Monitoring questions and indicators were developed to be able to identify trends and help inform management actions.

The ASNFs will be developing a Monitoring Implementation Guide which will describe how management actions will be evaluated in light of the results of monitoring.

**Concern Statement: Failure to carry American pronghorn forward as a focal species will limit the ability of the forests to evaluate the results of management actions on grassland ecosystems. (02)**

**Response:** The ANSFs agree that American pronghorn is an appropriate focal species for grassland ecosystems. In response to this concern, we added pronghorn as a focal species; the final white paper (USDA-Forest Service, 2016) contains the rationale for this change.

**Concern Statement: Monitoring should evaluate agency effectiveness at conserving biological diversity, site productivity, and sustainable flows of renewable resources. (04)**

**Response:** The ASNFs agree that these are important objectives of the forests' monitoring program. The updated Monitoring Strategy contains several questions directly or indirectly focused on each of these issues. For example, the following question directly addresses the conservation of biological diversity: "Are habitats for threatened, endangered, sensitive, and other species for the forests being maintained or enhanced; meeting recovery objectives; moving toward desired conditions; and contributing to species viability?" Likewise, the following question directly addresses the sustainable flow of renewable resources: "Are outputs of goods and services being produced at a rate consistent with projections?" Because the concern is adequately covered, no additional changes to the Monitoring Strategy are needed in response to this concern.

**Concern Statement: How does ASNFs monitor cultural resources, prehistoric sites, ARPA violations, and looting? (14)**

**Response:** The Land Management Plan (LMP) discusses the issue of damage, vandalism, and pilfering and acknowledges, as required by law and policy, that forest management practices are to minimize or avoid impacts to cultural resources. In addition the LMP has a desired condition that states "Significant cultural resources (i.e. archaeological, historic, traditional cultural properties (TCPs), known American Indian sacred sites) are preserved and protected for their cultural importance and are free from adverse impacts," along with an objective that states "Every 2 years or according to Southwestern Region Heritage Program standards, National Register sites and priority cultural resources are inspected." In keeping with meeting the desired condition and objective we agree a monitoring question should be added to monitor the protection of cultural resources. Therefore, we added the following question to address this issue: "What is the condition of archaeological sites and traditional cultural properties on ASNFs?"

## **REFERENCES**

USDA-Forest Service, 2012. National Forest System Land Management Planning. *Federal Register*, 77(68), pp. 21162-21276.

USDA-Forest Service, 2016. *Transition of Monitoring Strategy to Comply with 2012 Planning Rule*, Springerville, AZ: USDA-Forest Service Apache-Sitgreaves National Forests.