

Monroe Mountain Aspen Ecosystems Restoration
Objection #16-04-08-0002-OB218 Review Response
WildEarth Guardians et. al.

Objection Issue 1: Violation of the 2001 Roadless Rule, the NEPA and the APA (pp.6-9)

1. The Forests checklist with boxes that are either empty or occupied by an "X". This document and the related documents along with the EIS, together, constitute knowing and generally negligent failure to demonstrate, at a minimum, compliance with the Roadless Rule and failure to take NEPA's requisite hard look at this issue. In reality it's more substantial as evidence of knowing, arbitrary, and capricious violation of the NEPA, RACR, and APA.
2. Cutting inside IRA is contrary to the Roadless Rule. The cutting and removal of any and all mid and large diameter trees in these IRA forests is in plain violation of the RACR; it provides for no exceptions for such logging. It only has exceptions for limited logging of generally small diameter trees, which is exceeded here. Specific justification for the four exceptions under the RACR is missing and inadequate (under NEPA, the RACR, and the APA). (p. 11)
3. The FEIS mentions the Roadless Rule only twice (pages 26 and 34). In each case it repeats the same statement that a RACR consistency review was done and is in the project record. There is no cite to such a review on either page in the FEIS, nor can that one review be found in the project record. This constitutes the DROD's arbitrary and capricious failures to demonstrate compliance with the Roadless Rule, the APA, as well as the NEPA's duties for full and accurate disclosure of key issues and to take NEPA's hard look at such impacts. (p. 10)

Proposed Relief: Relief Requested Objectors invite the appropriate Regional Office and Forest-level staff to a meeting to discuss more specific avenues towards resolution and/or withdrawal of this objection

RESPONSE TO OBJECTION 1:

1. The determination that the FEIS complied with the Roadless Rule did not rely on the check list as the Objector alleges. Rather the checklist reflects the analysis from the IRA Specialist Report as well as other analysis found throughout the project record.

The check list did state the following: No new permanent or temporary roads are proposed within the IRAs. Mechanical treatments and associated slash burning, and prescribed fire treatments are expected to improve roadless area characteristics by improving threatened, endangered, proposed, or sensitive species habitat (i.e. Northern goshawks, Bonneville cutthroat trout, Boreal toads), and maintaining or restoring the characteristic of ecosystem composition and structure (i.e. aspen ecosystems), such as to reduce the risk of uncharacteristic wildfire effects, within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period. In addition, the cutting, sale, or removal of timber is incidental to the

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implementation of management activities not otherwise prohibited.

(RO_Attachment_1_and_4_2001_Rule_and_Line_Officers_Compliance_02_27_2014)

A review of the project record found the FEIS complies with the Roadless Rule §294.13(b) in the following ways

(1)(i) *To improve threatened, endangered, proposed, or sensitive species habitat.*

Mechanical thinning treatments are proposed immediately adjacent to goshawk territories, Bonneville cutthroat trout and boreal toad habitat within the IRAs. These treatments allow the safe and effective implementation of prescribed fire treatments; (FEIS p. 55)

(ii) *To maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects;*

To help accomplish the purpose and need, the District has identified a need to address the conifer encroachment that occurs due to the reduced occurrence of wildland fire primarily due to an increase in wildland fire suppression (FEIS p. ii). Completing the thinning and prescribed fire treatments will reduce the risk for large scale, intense wildland fires. Removing conifers also results in improved aspen composition and structure, resulting in healthier aspen stands; and

(2) *The cutting, sale, or removal of timber is incidental to the implementation of a management activity.*

Incidental cutting of timber may be expected to occur along control lines designed to protect historical and cultural sites (FEIS p. 44) and around the perimeter of prescribed fire treatment areas. Construction of control lines would primarily remove smaller diameter trees averaging less than 8 inch DBH, limb larger diameter trees, remove 1000 hour fuels, and dig handline. Trees larger than 8 inch DBH that may pose a threat to the effectiveness of the control lines would also be removed. (FEIS p. 47)

2. The Objection alleges that the Roadless Rule allows no more than limited and infrequent cutting of “generally small diameter timber” and nothing more. In fact the Rule states “The cutting, sale, or removal of timber in these areas is expected to be infrequent. (1) The cutting, sale, or removal of general small diameter timber is needed for one of the following purposes identified in §294.13(b). §294.13(b)(2) is not subject to the “generally small diameter trees” but is expected to be infrequent, hence the removal is “incidental” to other management activities not otherwise prohibited.

The Roadless Rule §294.13(b)(1)(i) and (ii), states that harvest should be generally small diameter trees, but, by intention, does not define small diameter. The preamble (36 CFR Part 294, p. 3257) states: “Because of the great variation in stand characteristics between vegetation types in different areas, a description of what constitutes ‘small diameter timber’ is not specifically included in this rule. Such determinations are best made through project specific or land and resource management plan NEPA analysis, as guided by ecological considerations”

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Vegetation Specialist Report (Holsclaw 2015a) compares effects by cover type between Alternative 1 and Alternative 5 Options 1 (cutting all conifers- range in dbh) and 2 (cutting only 8 dbh or less) (beginning on page 49). This comparison shows that Option 1 (removing all tree sizes) better meets the purpose of restoring the characteristics of ecosystem composition and structure (2001 Roadless Rule 294.13 b(1) ii) by resulting in a more pure stand of aspen and creates or maintains an uneven-aged stand of trees in mixed conifer and spruce/fir. Furthermore, Figures 38 and 39 (pp. 52-53) show that smaller diameter trees are the majority of trees to be removed and thereby meets the “generally small diameter” clause. The Vegetation Specialist Report needs to clearly define “small diameter” but does infer that small diameter is less than 8”. The Report (p. 20) states “Option 2 is to remove all conifers 8 inches DBH and below in Inventoried Roadless Areas”. The Report, a few sentences later, goes on to state “removing the smaller trees will not likely have much of an impact on succession.” The Report gives the appearance of a connection between 8” DBH and small diameter trees, though it does not specifically state it that way.

3. The FEIS (p. 206) cites 2001 Roadless Area Conservation Rule consistency review in the project record (USFS 2014c; RACR). Additionally the document is listed in the references section on page 419 of the FEIS. The document is available in the project record as RO_Attachment1_5 Final Rule and the RO concurrence letter as Monroe Aspen RO IRA Concurrence letter 3-12-2014. The rationale for how the proposed cutting, sale, and removal of timber is consistent with the Roadless Rule exemptions found in Section 294.13(b)(1)(i), (ii), and 2 will be provided in the Final Record of Decision.

Instructions:

1. Of the 6,858 acres of mechanical treatment (timber harvest), identify which treatment type and vegetation community type and number of acres apply to each of the exemptions (§294.13(b)(1)(i),(ii) and 2). Acres that apply to exemption §294.13(b) 2: “The cutting, sale, or removal of timber is incidental to the implementation of a management activity not otherwise prohibited by this subpart” are not subject to the “generally small diameter” consideration.
2. The Final ROD should explain how the project complies with the Roadless Rule parts §294.13(b)(1)(i) and (ii), and (2) beyond stating that the project does comply. On page 26, the Draft ROD states “In addition, the District did a 2001 Roadless Area Conservation Rule (RACR) consistency review to determine compliance. The District determined this project complies with §294.13(b) (1) (i) and (ii), and (2) of the 2001 Roadless Rule. This review and supporting rationale are found in the project record. The Intermountain Regional Forester also concurred that this project complies with the 2001 RACR.” RO_Attachment1_5 FinalRule.pdf (pg. 3) has a statement of compliance with the Roadless Rule which shows that the whole project complies with §294.13(b)(1)(i),(ii).
3. Define “small diameter” for this project. In Alternative 5, Option 1, there is not a discussion in the Vegetation Specialist Report of the average diameter of trees removed, however Figures 38 and 39 (pgs. 52 and 53) visually depict that the majority of trees to

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be removed are less than 8" DBH. It is the objectors opinion that small diameter constitutes 9 inch trees. The Vegetation Specialist Report needs to be updated to clearly define "smaller diameter" so that there is no question as to what the meaning of "smaller diameter" is. This definition of "smaller diameter" may be different and needed for each species or it may be the same for all species. Along with this, to substantiate the applicability of this project under the Roadless Rule Exemption of cutting "generally smaller diameter trees", a table showing the percentage of the trees harvested that fall into each diameter class is needed. This would help to clarify the treatment in spruce/fir and mixed conifer stands as well, to ensure that these treatments are legal under the Roadless Rule.

4. Analysis should clearly state how this project is improving habitat conditions for sensitive wildlife species if this is to remain as a justification for treatments within Roadless.
5. Explain how the spruce/fir and mixed conifer treatments are meeting the requirements of 294.13(b)(1)ii. Better describe that the purpose and need of aspen restoration cannot be met without the spruce/fir and mixed conifer treatments because the treatments are necessary "to use fire in a safe and effective manner" as a tool to restore aspen.

Objection Issue 2:

Violation of 36 CFR 294.11 defines inventoried roadless areas as the areas identified in the set of inventoried roadless area maps in volume 2 of the November 2000 RACR FEIS, or any subsequent update thereof.

There is no such update of the IRA maps on the Fishlake

RESPONSE TO OBJECTION 2:

The objector did not raise this issue during scoping or the draft comment period. However, the GIS data from 2000 RACR FEIS Volume 2 maps were used for this FEIS analysis. The Fishlake NF has not made any updates or revisions to inventoried roadless areas and therefore no updated maps exist.

Objection Issue 3: Failure to Meet Intent of NEPA for Analysis of Cumulative Effects

Aspen and Water Developments: Neither the Monroe Mountain Livestock Improvement Project (MMLIP) nor this FEIS analyzed the impacts of livestock concentrations around water developments.

Flooding and Erosion: The analysis ignored the effects of livestock grazing, roads, or timber harvest in the affected watersheds. A basic analysis would have considered the ground cover and residual vegetation, and soil compaction that affects infiltration and runoff as well as the

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condition of riparian vegetation (willows, grasses, rushes, sedges) and slope steepness. This was not done for those watersheds, nor were the effects of livestock grazing on soil cover, riparian vegetation and bank stability analyzed. There was no road density analysis, slope percentages, or timber harvest areas. Failure to fully analyze the current condition of watersheds, riparian areas and the impacts of livestock grazing, past vegetation treatments, wildfires is a violation of the Hard Look and Cumulative Effects Analysis requirements of NEPA.

Past Treatments, Fires and Watersheds: There was no analysis of the effects of livestock grazing on understory herbaceous vegetation and aspen (utilization, trend, soil cover, aspen browse, proximity to water sources), nor changes in relative amounts of aspen and conifer. Now, the FEIS has failed to analyze the factors leading to the current condition of these past treatments or burned areas and how its management affected these.

RESPONSE TO OBJECTION 3:

Aspen and Water Developments: The Monroe Mountain Livestock Improvement Project (MMLIP) began implementation in 2013 and sufficient impacts analyses for that project are not yet available. The expected outcome from the decision was benefits to vegetation communities due to dispersed livestock grazing. Therefore cumulative effects statements in FEIS (p. 384-385) apply to this project.

Appendix A of Range Report (Partridge 2015) provides acres treated in past, present, and reasonably foreseeable future actions including Swift Springs Water Development Project and MMLIP. The FEIS (p. 384-385) provides acres of treatments and states that “The past treatments in the aspen communities have been relatively small and the aspen regeneration (sprouts) have suffered from the effects of grazing, as animals keyed in on those small treatments which produced more and better forage.... Approximately 49,000 (28 percent of National Forest System acres on Monroe Mountain) acres of vegetation (mixed vegetation types) have been or will be treated from 1969 through 2015 (46 years) a little over 1,000 acres per year. Alternative 5 would treat almost that many acres (42,000) in the aspen ecosystem in a 10-year period (4,200 acres per year). ... When added with the past, present and reasonably foreseeable actions the cumulative effect that Alternative 5 would have on the environment is that approximately 52 percent of the National Forest System acres on Monroe Mountain would have better forage conditions.”

The Vegetation Specialist Report (pp. 19, 20, 27-29, 37-39, 47-49, 57-59, and 71) discusses cumulative effects. Alternatives 2-5 have adequate discussions of cumulative effects, taking into consideration past treatments and expected future treatments. Tables, such as Table 7 in the Vegetation Specialist Report (p. 27), do a good job showing the past and present and foreseeable future actions in each of the alternatives 2-5.

Flooding and Erosion: Cumulative effects for watershed and riparian/aquatic resources are provided within the project record. The Hydrology/Soils Specialist Report includes discussion on combined impacts that have caused lakes and streams within the project area to be impaired and on the State 303(d) list as impaired for water quality issues (pH, dissolved oxygen, total phosphorous, mesotrophic) (FEIS Vol. III pp. 28). Maps 1-4 (FEIS Vol.III pp. 34-37) show the

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combined proposed management treatment areas with past treatments within the HUC6 and sub-HUC6 delineations used for analysis. Effects of 11 other projects that occurred between 2011-2015 are discussed for their potential to cumulatively impact hydrologic/watershed resources (FEIS Vol.III pp.50-51). These projects include timber harvest, vegetation management, prescribed fire and wildfire.

Detailed cumulative effects analysis is within the Aquatic Species Specialist Report and Appendix H to that report (FEIS Vol.II pp. 312-314, 342-347, 440-449). Combined impacts of cattle grazing, vegetation treatment projects, wildfires, recreation activities, travel management, special uses and water management are discussed in the main report. Appendix H contains cumulative effects modelling using Region 5 Cumulative Off-site Watershed Effects Analysis. This model provides quantitative analyses of cumulative effects within all project watershed areas by adjusting forms of soil disturbance to an equivalent road area (ERA). Forms of soil disturbance analyzed in the model include roads, trails, fire, timber and vegetation management activities, and livestock grazing. A summary of the Equivalent Roaded Area Analysis (ERA) with discussion impacts of other past and future projects is provided (Vol.III pp. 312-314).

Objection Issue 4: Aspen Response Options are insufficient and poorly defined.

It is clear that Monroe Mountain is significantly overstocked. The current livestock grazing permits exceed the carrying capacity of the area and is a fundamental cause of the current degraded conditions and failure of aspen regeneration. (p. 13)

- a. Adaptive management requires a clear if X, then Y process not just a list of vague possibilities
- b. ROD lacks site specific plan implementation duties established by APA, NEPA and FNF LRMP/ROD/NFMA

Proposed Remedy:

Revise the DROD to include a clear set of actions based on monitoring results. For example, after livestock return to a treatment area (and importantly if livestock control actions like herding and temporary electric fence are not effective) AUM's would be reduced proportionately to the level of browse threshold exceedance. (p. 13)

RESPONSE TO OBJECTION ISSUE 4:

The Range Specialist Report identifies that without some kind of disturbance (i.e. fire or logging) aspen will eventually be replaced by late successional species. Grazing of aspen by animals tends to speed up the succession process because some of the aspen seedlings don't survive after being grazed. Stable aspen is not replaced by late successional species, but in the lack of disturbance to stimulate it to sprout, the aspen may die. (p. 17) The report also recognizes that the above changes have resulted in a smaller forage base for livestock and wildlife. Historically, there were over 300,000 acres of aspen on the Fishlake National Forest, but today, aspen occupies only

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about 150,000 acres (Bartos and Campbell 1998). As aspen communities have been converted to conifers, approximately 150,000 AUMs (Animal Unit Months) have been lost on the Fishlake and historic cattle and sheep use on Monroe Mountain was much higher than current use. (p. 18) (See Response to Objection Issue 5 for further discussion)

According to the adaptive management guidelines under 36 CFR 220.5(e)(2) “The proposed action and one or more alternatives to the proposed action may include adaptive management. An adaptive management proposal or alternative must clearly identify the adjustment(s) that may be made when monitoring during project implementation indicates that the action is not having its intended effect, or is causing unintended and undesirable effects. The EIS must disclose not only the effect of the proposed action or alternative but also the effect of the adjustment. Such proposal or alternative must also describe the monitoring that would take place to inform the responsible official during implementation whether the action is having its intended effect.”

While the FEIS and ROD do not use the term “adaptive management” the essence of “adaptive management” is captured in the thresholds and response management actions. The FEIS Vol I (pp. 55-63) and the DROD (pp. 20-24, 41-47 and 63-64) outline the browse thresholds for specific treatments and the responding responses. The Adaptive Management discussion originates in the document entitled “Browsing Thresholds and Adaptive Management Pursuant to Aspen Restoration on Monroe Mountain”, submitted by the Monroe Mountain Working Group. The Forest took the recommendations for thresholds and incorporated them into the FEIS and Draft ROD with some modifications. The FEIS identifies a range of specific actions that may be implemented if the thresholds are exceeded while allowing flexibility as to which action may be used for specific situations. The FEIS in Chapter 2 and the Range Specialist Report (p. 14) adequately discusses the existing monitoring plan, the baseline data that has been collected, and the potential for additional monitoring transects to be installed. This is the monitoring plan upon which the determination of whether thresholds have been exceeded will be based.

Objection Issue 5: NEPA’s Requirement for Analysis of Reasonable Range of Alternatives and a Hard Look

“A large portion of the proposed treatment area is in a 4B management strategy according to the Fishlake Land and Resource Management Plan. This management strategy gives preference to wildlife if competition for forage becomes a management concern for MIS.” The failure to address this forage issue via an alternative that addressed livestock grazing fully violates this 4B criterion. Failure to do this analysis also violates NEPA’s requirement for a “hard look”.

Livestock grazing rates, overstocking and over-browsing not addressed via any alternative

Consequently: failure to address this project’s foundational issue of Aspen upland and riparian communities and watersheds not addressed (grazing is the reason for needing Aspen Regeneration project)

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RESPONSE TO OBJECTION ISSUE 5:

LRMP 4(b) Management Prescription Range Resource Management (D02) 2 states “Modify split between wildlife and livestock so needs of management indicator species are met.” Figure 5, page 8 of the FEIS Vol I, along with Table 1 on the same page and the wildlife report shows that the needs for management indicator species are being met with stable populations. Forage availability analysis is not necessary for this project, because as utilization standards are met livestock are removed from the area.

The need to address aspen decline on Monroe Mountain is to (1) address the conifer encroachment that occurs due to the reduced occurrence of wildland fire primarily due to an increase in wildland fire suppression, and (2) address aspen overbrowsing by domestic and wild ungulates (FEIS p. 27). Chapter 2 of the FEIS provides an adequate range of alternatives with respect to vegetation treatments, including one the no action alternative and four action alternatives (FEIS p. 65-108) that address the purpose and need for the project and were analyzed in detail (FEIS Chapter 3). Livestock and wildlife impacts on aspen regeneration would be addressed using design criteria (p. 45) and establishment of treatment monitoring and aspen overbrowsing thresholds (p. 55- 61). Domestic livestock would be removed from treatment areas or stable aspen areas for two to three growing seasons. Discussions on how to best rest the treated areas would occur directly with the permittees and methods incorporated into AOIs. Adjustments to the antlerless hunt would be recommended to UDWR and is outside the decision authority of the Forest Service. In addition six alternatives were considered but not analyzed in detail for reason specified in the FEIS (p. 115-125). (See Response to Objection Issue 4 for further discussion)

The Range Specialist Report and Wildlife Specialist Report provide analysis of impacts including browsing by domestic and wild ungulates. The FEIS (Pages 3-27) includes information about vegetation, livestock and wildlife AUMs, stable aspen conditions, aspen understory conditions, ground cover, and aspen browse.

Available data on utilization pertaining to this project is presented on page 27 of the FEIS.

Deer winter range is identified in Figure 86 of the FEIS (p. 366).

**Objection Issue 6: Livestock ‘rest’ is insufficient to meet objectives
(p. 11-13)**

DROD fails to provide criteria for 2-3 year rest. The two or even three years is insufficient to result in regen above browse height and constitutes arbitrary and capricious decision making that lacks minimum requisite specificity required for site-specific plan implementation duties established by the APA and the NEPA as well as those found in the LRMP/ROD and the NFMA.

Proposed Remedy:

Given the widespread failures in previous aspen treatments throughout the mountain and the short time window for successful regeneration, the Forest needs to err on the side of caution. As

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such, pastures with treatments need to be rested until trees are above browse height. As a much higher risk alternative, the rest should be a three year minimum.

If the Forest refuses to take a path with less risk, by putting the wishes of permittees above the needs of the ecosystem then at a very minimum the Forest needs to provide criteria for the choice of two or three years. (p. 15)

RESPONSE TO OBJECTION ISSUE 6:

The issue of the DROD failing to provide criteria to distinguish between two or three years of rest from grazing after implementation is addressed in the FEIS section 2.6.1 Areas Proposed for Mechanical and/or Prescribed Fire Treatments. However this objection issue was not specifically addressed in the previous comment letters by the objectors. Therefore this issue has been set aside from review as per CFR 218.8(c) "Issues raised in objections must be based on previously submitted specific written comments regarding the proposed project or activity and attributed to the objector, unless the issue is based on new information that arose after the opportunities for comment."

Objection Issue 7: Livestock 'herding' is insufficient to meet objectives (p. 15)

- Herding costs permittees money and as a result herding is never done
- Herding requirements have a long history of failure
- EIS fails to discuss the effectiveness of this mitigation measure
- EIS fails to discuss how this mitigation would be implemented and verified

This objection issue constitutes arbitrary and capricious decision making that lacks minimum requisite specificity required for site-specific plan implementation duties established by the APA and the NEPA as well as those found in the LRMP/ROD and the NFMA.

RESPONSE TO OBJECTION ISSUE 7:

The District would ensure the resting of treatment areas, herding, and electric fences are incorporated into Annual Operating Instructions. These actions would help ensure that permittees are in the communication loop and would give them enough time to plan for the resources they need to continue their operations. (FEIS p. 45) The FEIS (p. 374) recognized that herding and fencing may not be sufficient and states that if herding and fencing are insufficient then complete rest of the allotment/pasture would be considered.

The planning and implementation of livestock grazing rest for treatment areas will require a solid working relationship between the Forest Service and livestock grazing permittees. This working relationship will play a key role in the success of this aspen restoration project. (FEIS p. 374, Range Specialist Report p. 23)

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Objection Issue 8: Monitoring is undefined.

The DROD discusses aquatic monitoring but merely points to Appendix F which the Forest states “provides an example of a monitoring plan” not the monitoring plan required by the ROD itself. This constitutes arbitrary and capricious decision making that lacks minimum requisite specificity required for site-specific plan implementation duties established by the APA and the NEPA as well as those found in the LRMP (as emphasized by explicit commitments in its ROD) and the NFMA. (p. 15-16)

Proposed Remedy:

Revise ROD to include ROD-level commitments to implement a specific monitoring plan that is coupled with explicit thresholds that, when reached, result in clear and meaningful management changes.

RESPONSE TO OBJECTION ISSUE 8:

Aquatic monitoring is identified in the Draft ROD p. 15-18; FEIS Vol. I, p. 48-51, 351; Aquatics Specialist Report p. 15-22, 110, 113, 117, 126-128, Appendix J & D and Table F-1; Aquatics BA BE, p. 19-23 and FEIS Vol II.

There are two components to aquatic monitoring: 1. boreal toad monitoring and 2. Additional fish population, streamflow, water turbidity, basic water chemistry, and aquatic macroinvertebrates monitoring.

1. Appendix F (p 126) states that current monitoring is not adequate to determine trend (K. Wheeler, UDWR Native Aquatics biologist, email communication 7/28/14), not to mention survival rates, movements, habitat use, or identification of key habitat features needing protection. While the exact nature of the monitoring program has not yet been designed, and needs future interagency coordination and cooperation to determine funding sources, personnel, and responsibilities before it can be finalized, **Appendix J** provides an example monitoring plan that would be sufficient to meet this need. Appendix J is a detailed monitoring proposal designed to meet boreal toad monitoring needs. Monitoring for boreal toad (Aquatic Specialist Report, Appendix J) is tied back to specific management actions for where boreal toads are found and has details with specific objectives, actions and reporting.

Appendix J recommends the actual monitoring plan should be developed through interagency coordination and recognizes that while it may vary somewhat from the detailed plan in Appendix J it should be of a similar scale and address AIS control measures and annual review and reporting requirements. (Appendix J p.1)

2. The additional fish population (Aquatic Specialist Report p. 127), streamflow, water turbidity, basic water chemistry, and aquatic macroinvertebrates monitoring was identified to help validate design features and lead to better future project design, validate the effects analysis, and generally provide feedback to improve project planning and implementation to reduce aquatic biota impacts on other areas where landscape scale treatments are undertaken.