United States Department of the Interior
FISH AND WILDLIFE SERVICE
UTAH FIELD OFFICE
2369 WEST ORTON CIRCLE, SUITE 50
WEST VALLEY CITY, UTAH 84119

In Reply Refer To
FWS/R6
ES/UT
03-0948

July 14, 2003

Robert S. Gardner, District Ranger
Fillmore Ranger District
390 South Main
PO Box 265
Fillmore, UT 84601

RE: Pahvant Interagency Fuels Reduction Project

Dear Mr. Gardner:

The U.S. Fish and Wildlife Service (FWS) has reviewed your letter of June 24, 2003, the Environmental Assessment (EA), and the Finding of No Significant Impact (FONSI) statement. The purpose of the 14,329-acre project is to change the fire behavior conditions near communities to reduce the risk of uncharacteristically intense and severe wildfire and secondary effects. The Forest Service (FS) and Bureau of Land Management (BLM) propose to treat areas through cutting vegetation by hand, piling or scattering cut vegetation, burning cut vegetation by hand or helicopter, and broadcast burning by hand or helicopter. Broadcast burning would provide a desired mosaic of vegetative communities, with 40-80 percent of the vegetation within areas being treated. Vegetation to be treated includes sagebrush-grasslands, pinyon-juniper, and Gambel oak.
Prescribed burn areas would be seeded with a noxious weed-free seed mix to promote recovery of ground cover.

Consistent with NEPA regulation 40 CFR § 1503.1(a)(1) that the action agency shall obtain the comments of any Federal agency which has jurisdiction by law or special expertise with respect to any environmental impact involved, we are responding to your request for concerns and comments on this project. In this letter we convey recommendations that should be addressed in the final EA and FONSI documents for this project.

The proposed study area is comprised of 7 treatment areas (Grabalt, Wild Goose, Holden Springs, Pioneer, Frampton Heights, Horse Hollow, and Meadow) totaling 14,329 acres within the Filmore Ranger District of the Fishlake National Forest and the Fillmore Field Office of the BLM. These sites occur within and near historic pygmy rabbit habitat. Surveys should be done to assess whether or not this species occur within the proposed treatment areas. Potential project benefits and impacts to pygmy rabbits should be evaluated. Project planning and implementation should strive to provide a mosaic of habitats and connectivity to support these and other native

wildlife species, based on available scientific information. For example, retaining an untreated mature sagebrush component may be important for retention of suitable pygmy rabbit habitat if the species occur in the project area. We recommend that you coordinate with the Utah Division of Wildlife Resources sensitive species biologist during project planning. Post project monitoring should be included to determine success of habitat manipulations for pygmy rabbits. Limited information is available for pygmy rabbit habitat requirements; if this species occurs in the project area, post-project monitoring will also be essential toward furthering our knowledge of the species and our ability to effectively manage habitats across its range.

The final EA documentation should discuss the future vegetation communities created in treatment areas and the impacts, both positive and negative, to wildlife resulting from changes in the extent, distribution, and composition of vegetative communities. We recommend that native plant species be seeded so as to avoid the potential risks associated with non-native seed, such as introducing potential noxious weeds, loss of biodiversity, and the reduced distribution of native vegetation and use in the area. Through time, animals and vertebrate have adapted to utilize the native plant species available. When non-native plants are introduced, there may be deleterious effects to the localized ecosystem. We recommend that the final EA documentation contain a list of species that may be used to seed the prescribed burn areas.

We recommend that inventory for invasive plant species becomes part of the final EA document. Detailed inventory and mapping of invasive species, such as cheat grass and knapweed, in and near treatment areas could identify potential problems. The fuels reduction treatment should be evaluated with regard to the potential for increased spread of invasive species and describe the measures to be taken to avoid and/or control invasive plant species.

We appreciate the opportunity to provide these comments. If you need further assistance, please contact Bekee Megown, Fish and Wildlife Biologist, at the letterhead address or (801) 975-3330 ext. 146.

Sincerely,

For Henry R. Maddux
Utah Field Supervisor