



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Denver Federal Center, Building 56, Room 1003  
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Denver, Colorado 80225-0007



August 28, 2007

9043.1  
ER 07/0622

Faye L. Krueger  
Forest Supervisor  
8236 Federal Building  
125 South State Street  
Salt Lake City, UT 84138

Dear Ms. Krueger,

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement for the Big Creek Vegetation Treatment Project, Wasatch-Cache National Forest (DEIS) and offers the following comments.

## **SPECIFIC COMMENTS**

### **Section 3.12, Wildlife (Terrestrial), pages 3-106 through 3-154**

There are many statements that reference surveys conducted for various species in the analysis area and statements of fact about species. It would benefit the public if the EIS included available supporting references regarding these surveys. Where a reference cannot be cited for a particular survey, information should be provided, such as who conducted the survey, when it was done, and where results can be found, even if the results are stored in project files. It would also benefit the public if the final environmental impact statement (FEIS) listed the criteria that were used to select the three terrestrial wildlife management indicator species listed on page 3-113 (the goshawk, snowshoe hare, and beaver). Additionally, we suggest that the FEIS include available supporting references regarding statements of fact about species in the project area. Examples of these include, but are not limited to the following:

- "It [northern goshawk] typically nests in mature and old forests...Observations of foraging goshawks show that they hunt in many forest conditions...Specific habitat attributes used by these species include snags, downed logs and woody debris, large trees, herbaceous and shrubby understories, and a mixture of various forest vegetation structural stages." (page 3-114)
- "In 1999-2001, [Canada] lynx hair snares were established throughout Utah and other western states. No lynx hair samples occurred in northern Utah during this effort." (page 3-139)

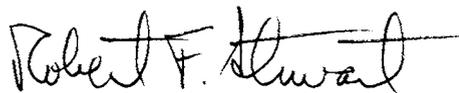
- "Great gray owl surveys have been conducted on the Ogden Ranger District. Data collected from these surveys yielded no evidence of great gray owls. In general, it is felt that these winter vagrants only occasionally visit Utah." (pages 3-144 - 3-145)
- "Recent research has documented population declines of this species [Greater sage grouse]...Sagebrush is the predominant plant of quality habitat. Where there is no sagebrush, there are no sage grouse." (page 3-148)
- "Surveys for the sage grouse have been conducted by UDWR for several years..." (page 3-148)
- "On July 7, 2005 a survey for pygmy rabbits was conducted in the vicinity of Big Crawford Spring...On February 23, 2006, a survey of the northeastern portion of the Ogden Ranger District was conducted for the presence or absence of pygmy rabbits." (page 3-149)

The DEIS includes a discussion on Townsend's Big-eared bats (pages 3-146 and 3-147). However, within that section, the DEIS starts discussing habitat and roosting requirements of Western big-eared bats. It is unclear if this discussion was intended to address the former species. Additionally, the DEIS states that, "...most bat species tend to utilize riparian habitats due to the presence [of] water and abundance of insects." Because the discussion involves the Townsend's Big-eared bats, we recommend that the FEIS identify and provide references for the food requirements of this specific species.

The DEIS states that a combination of mechanical treatments, prescribed fire, and/or herbicide treatment is proposed across the project area. For the most part, however, the document does not explicitly discuss the potential impacts resulting from herbicide treatments nor discuss the potential need for mitigation measures for terrestrial wildlife species. Only one statement regarding a mitigation measure for herbicide treatment for a group of species was found on page 3-150, "...To minimize effects to neotropical birds mechanical and herbicide vegetation treatment of shrublands will occur prior to May 1 or in late summer or fall to avoid affecting nests, eggs, and nestlings." It would benefit the public if the FEIS included a holistic analysis of species-specific potential impacts from herbicide treatments, including an analysis of trophic level interactions, as well as proposed appropriate mitigation measures based on available scientific studies with supporting references.

Thank you for the opportunity to review and comment on this draft EIS. If you have any questions concerning our comments, please contact Lloyd Woosley, Chief of the USGS Environmental Affairs Program, at (703) 648-5028 or at [lwoosley@usgs.gov](mailto:lwoosley@usgs.gov).

Sincerely,



Robert F. Stewart  
Regional Environmental Officer

cc: Chip Sibbernsen, District Ranger