

Appendix 7.
Suggestion letter.

The Nature Conservancy

69-COO-E-11

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March 12, 1985

Sonny O'Neil
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Dear Sonny:

Enclosed you will find two sets of comments from The Nature Conservancy regarding the Proposed Plan and DEIS for the Medicine Bow National Forest.

We focus our comments on the Plan's treatment of natural diversity as it occurs on the forest. We feel that there are some serious shortcomings in this treatment, related to insufficient inventory of forest resources and inflexibility in Management Area Prescriptions.

We realize, however, that such deficiencies are not peculiar to the Medicine Bow, and that it will take years of cooperative effort between the Forest Service and such organizations as The Nature Conservancy to correct them. We hope that the enclosed comments will prove to be a start in the right direction, and we hope to supplement them in the near future with fieldwork and further data about natural diversity on the Medicine Bow National Forest from our Rocky Mountain Heritage database.

In the meantime, the Forest Service could make one change fairly easily that would create a framework for beginning to satisfy our concerns. Other forests in Region II, such as the Bighorn National Forest, do include Management Area Prescription 10C for Special Interest Areas. We believe that your plan could profit from using this prescription, and we have provided a list of candidate areas based on the workings of the Natural Area Needs Conference. We will make the Proceedings of that conference available to your staff as soon as possible and certainly within the time needed for inclusion in the Final Plan and FEIS.

A

69-A
We have added Prescription 10C to the final Plan.

In the meantime, we urge you to consult with the Region II Research Natural Areas Committee and with the Rocky Mountain Forest and Range Experiment Station to coordinate research needs and diversity representation needs with candidate areas. We will provide a copy of these comments to both those offices.

VI-134

Planning Problem Statement #5 addresses some of our diversity concerns, but it does not focus as clearly as it might on the requirements for vegetative diversity. Admittedly, these requirements as stated in the National Forest Management Act are vague, but we think they could be focussed better if planners began with the recommendations from the Natural Areas Conference and from the Region II RNA Committee. These recommendations include, of course, the formal RNA candidates, which we heartily endorse as part of the Preferred Alternative:

Savage Run (950 acres) lodgepole pine
 Huston Park (40 acres) sphagnum bog
 We also support continued protection for the Snow Range (771 acres) Englemann spruce site.

In Chapter III, Pp. III-1 ff., there is a discussion of the major vegetation zones on the forest. While we find this an accurate if generalized way of describing natural diversity as it occurs on the forest, we also think it could and should be supplemented by the site-specific, species-specific data from the database of the Rocky Mountain Regional Task Force, located at 1370 Pennsylvania St., #190, Denver, CO 80203. This database gives valuable regional and global perspectives to questions of the relative rarity of animals, plants, and plant communities.

These same comments about the general treatment of vegetative diversity apply to the discussion on III-48. Close cooperation with the Region II RNA Committee and The Nature Conservancy could improve this aspect of the plan over time.

THE PROPOSED FOREST PLAN

At II-36, vegetative diversity should be treated both on its own (answering the question "What inventory do we have?") and also as a function of management activities in Planning Problem Statement #5.

In Planning Problem Statement #14, RNAs' and SIAs' site values are mentioned, but the discussion seems confusing, since SIA's are not presently an option for planners without adding IOC. This oversight is repeated at III-13 ff.

II-46 ff "Research Needs" provides a beginning, but we fail to see a connection between these needs as stated here in the abstract and the present or proposed RNA's on the forest. We believe these needs are serious and urgent. They are the kinds of local issues that should percolate up through the Resource Planning and Assessment process to the national level, where hard targets for achieving them should be assigned to each forest through the regional RNA Committees and the Experiment Stations. These research needs could and should provide planners with the kinds of hard targets needed to drive a comprehensive RNA/SIA system for the forest and for the region. A wish list is not enough.

Planners should consult with the RNA Committee and with the Experiment Station to be sure these and other questions relative to natural diversity are answered in a systematic way. The "Standards and Guidelines" discussion under Management Requirements at III-13 would be the place to quantify such concerns.

69-C

We believe that vegetative diversity can be achieved through management, including treatment of vegetation in the various ecosystems within the National Forest System. As you state, the requirements of the National Forest Management Act are somewhat vague relative to diversity. However, we do not think that designating a number of Research Natural Areas or Special Interest Areas can provide a real measure of horizontal, vertical, and species diversity which will benefit both wildlife and mankind.

69-D,E

We appreciate your concern regarding the generalized presentations on vegetation and wildlife. The degree of specificity presented in the Plan and FEIS is related to the needs of the decision being made. Forest Service data bases contain much more specific information than was presented in documents you reviewed.

69-F

We generally agree with your point; however, Planning Problem Statements were developed from public issues and concerns. Vegetation diversity did not surface to any degree during scoping. The subject was addressed because of the Forest's concerns relative to improving vertical, horizontal and species diversity of the vegetation resource.

69-G

Special Interest Areas (Management Area IOC) have been added to the Forest Plan.

69-H

The abstract has been revised to reflect changes in the Forest Plan and EIS. It should be pointed out that Research Natural Areas are designated by the Chief of the Forest Service on recommendations by the Regional Forester and Research Station Director. RNA's are not usually duplicated on other forests. For example, it would not be appropriate to recommend an RNA for a Ponderosa Pine ecosystem if the same ecosystem existed on an adjacent forest.

COMMENT 69 (cont.)

Finally, Appendix D, Table D-1, lists the application by prescription of stipulations for mineral leasing. This table demonstrates one of the reasons why Research Natural Areas are not the best tool for managing natural diversity on the forest, since they are quite restrictive. To this table should be added prescription 10C, with the appropriate columns showing a manager's options under SIA designation. Such flexibility would lessen potential conflicts between diversity concerns and mineral leasing.

We also agree with your management prescriptions and plans for the virgin Ponderosa pine stands in the Laramie Peak area. These stands are of great botanical interest. They are located near Art Fawcett's old house near Rock Mountain on Horseshoe Creek. See the Esterbrook Quad map, T27N, R71W, sections 29 and 32. Timber harvest in this immediate area is not appropriate, and I understand from a August 10, 1984 letter from forest planner Ron Olsen that this area will be managed as semi-primitive dispersed recreation. Recreationists ought to have a chance to look at these stands, so SIA designation ought to be considered.

We also commented earlier on the Ted Creek Drainage, which we feel is an important site for the protection of Salmo clarki pleuriticus. We would like to repeat those concerns here. Present and potential water development in the immediate area poses great hazards to the viability of this watershed. We encourage the Forest Service to continue its cooperation with the Wyoming Game & Fish Department in managing this site to protect the fisheries. The parts of Ted Creek in Sections 22 & 23, above the present water development work, should be carefully monitored for adverse impacts.

February 25, 1985

MEDICINE BOW NATIONAL FOREST PLAN

Preface: In November of 1984, The Nature Conservancy and the principal land use agencies at work in Wyoming co-sponsored a Natural Area Needs Conference. As of this writing, the Proceedings of that conference are still in preparation. In order to facilitate their introduction into the forest planning process, we have excerpted these comments from those proceedings. We also wish to provide this information in a timely manner to abide by the provisions of public comment on the Medicine Bow Forest Plan and DEIS. As understood by all the conference participants and co-sponsors, the results of the conference imply no official sanction for the recommendations contained herein. They must bear their own weight because they represent the consensus of the best biological knowledge of the present-day land use situation in Wyoming.

Many of the sites recommended will require more fieldwork and research before they can be designated Special Interest Areas or Research Natural Areas. Given the constraints of the forest planning process, however, we felt that these sites should receive some protection until it can be determined whether they merit full designation.

FOREST SERVICE RESPONSE

69-I
Table D-1 has been modified to add Prescription 10C.

69-J
In response to public comments, an area in the Ashenfelder Basin has been designated a Special Interest Area (10C Prescription).

69-K
The State of Wyoming and the Forest Service recognize the Colorado River cutthroat trout as a sensitive species. In addition, the fish is considered a management indicator species. We believe the direction in the Forest Plan will provide sufficient protection for the species. In addition, other populations exist outside of Ted Creek, and it is our intention to improve habitat conditions where the fish exists to expand the range.

VI-137

COMMENT 69 (cont.)

FOREST SERVICE RESPONSE

In this regard, it seems unfortunate that the Medicine Bow Draft Forest Plan lacks an important category present in other Region II forest plans: 10C, the Special Interest Area category. We hope that this category can be added in the final plan to accommodate some of the sites mentioned here and to make room for more in the ongoing forest planning process as research and further documentation make candidacies for designation stronger.

The Natural Areas Conference divided its work into Working Groups, which then ranked sites statewide according to their particular area of interest. While those rankings are not yet available, the following comments do reflect the working group divisions.

69-L

We have added the category of Special Interest Areas.

FOREST AND WOODLANDS

1) Ashenfelder Basin

This site is located on the north side of Laramie Peak at T27, R71, sections 25,19,18. It is a complete and undisturbed watershed which has as its focus of biological interest a conifer basin containing the following series: Pinus ponderosa, P. contorta, Abies lasiocarpa, Picea engelmannii, and Populus tremuloides. The finest stands present are the unlogged ponderosa stands. The rare plant Aquilegia laramiensis is probably also present in the nearby rocky crevices. There is quantitative data available from Professor Dennis Knight at the University of Wyoming Botany Department.

Recommendation: There is enough data to qualify this site as a Special Interest Area for Botanical Concerns.

2) Cinnabar Park

This site focuses on ribbon forests, snow glades, and recent burns. Professor Dennis Knight has done research here on nutrient recycling. The site is located at T15, R79, section 36.

Recommendation: This site should be managed to protect its biological interests and to preserve further research options.

3) Dry Park

A good example of the lodgepole pine series. Contact: Dennis Knight. Location: T14, R79, section 22.

Recommendation: same as #2.

AQUATIC AND RIPARIAN

1) Encampment River

This is a pristine canyon of great biological interest. It is located at T14,13,12; R84.

Recommendation: This area should be considered as either a Research Natural Area or a Special Interest Area. If the former, then further work is needed to focus interest on special parts of the canyon.

COMMENT 69 (cont.)

2) Libby Flats

There is nothing else like this site on the Medicine Bow. It is the focus of Billings' publication on ribbon forests and on subalpine palustrine elements. Location: T16, R79.

Recommendation: Special Interest Area.

RARE PLANTS

1) Brady Rock

This isolated rockpile is accessible only by foot. It is located at T14, R71, sections 8 and 17. Its focus is on three ferns and a fern ally: Asplenium septentrionale, A. trichomanes, Polypodium vulgare, and Selaginella underwoodii, respectively.

Recommendation: Given its inaccessibility, this site should simply be managed appropriately for its botanical interests.

2) Lost Creek

This area in the Sierra Madre contains three species of interest: a) Cypripedium fasciculatum--a glacial relict lady's slipper on the southeast of its normal range; b) Mertensia brevistyla--a species whose normal range is much further south; c) Trillium ovatum--another glacial relict. The location of this site is T14, R86, Section 33.

Recommendation: this site should be managed to protect its unusual botanical values.

3) Medicine Bow Peak

This is the best example of alpine tundra in the Medicine Bow National Forest. Located at T16, R79, sections 17,18, it contains the unusual and rare species Carex arapahoensis, Agrostis borealis, Chionocharis jamesii, and Haplopappus pygmaeus.

Recommendation: This site should be managed to protect its botanical values.

SHRUBS AND GRASSLANDS

1) Quercus gambellii. This is an unusual community for Wyoming, since it is usually found much farther south. Scattered along the buttes and ridges on the west slope of the Sierra Madres, it is found near the Sandstone Ranger Station at T13, R87, sections 9,10. It is also found on Battle Mountain at T12, R88, sections 3,10.

Recommendation: These sites should be surveyed further and managed to protect these botanical resources.

FOREST SERVICE RESPONSE

69-M

Areas within the following have been designated to be managed under Prescription IOC:

Ashenfelder Basin
Cinnabar Park
Dry Park
Libby Flats (example of ribbon forest)
Medicine Bow Peak
Gambel Oak Community (Battle Mountain area)

Encampment River, Brady Rock and Lost Creek were not included. The Forest Service does not believe that the areas are significantly unique or need additional designation to preserve their characteristics or features.

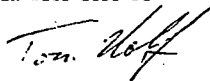
COMMENT 69 (cont.)

FOREST SERVICE RESPONSE

NB: The above recommendations are those of The Nature Conservancy, since conference participants generally did not make management/designation recommendations.

Comments submitted as part of The Nature Conservancy's comments on the Draft Forest Plan for the Medicine Bow National Forest. Further remarks on the role of natural diversity in the Medicine Bow plan will also be submitted.

Thank you for the opportunity to comment.


Tom Wolf
Protection Planner