

## **5.2 APPENDIX B – COMMENTS AND RESPONSES FOR THE WEST FORK BLACKS FORK GRAZING ALLOTMENT ENVIRONMENTAL IMPACT STATEMENT** \_\_\_\_\_

This chapter provides the Forest Service response to comments received on the DEIS. The Draft Environmental Impact Statement (DEIS) for the West Fork Blacks Fork Allotment was released for public review on August 2005. Copies were sent to interested parties identified during the scoping process and to local, state and federal agencies.

Twenty-four letters were received during the comment period, which ended on October 2, 2005. All letters were reviewed and summarized by the interdisciplinary team members. All summarized comments are included in this chapter for public review. Individual letters are on file in the project record.

Changes in the Final Environmental Impact Statement (FEIS) were based on the comments received on the DEIS and further analysis by the Forest Service.

Letter Number	Name	Comment	Response to Comment
1.1 letter	WWP	Some of the information and analysis on the West Fork Blacks Fork that must be included in the EIS so that Interested Parties and Decision-makers can be informed as NEPA intended....	
1.1a, 1.1d, 1.1e	WWP	This includes maps, descriptions, and acres of vegetation and range types. The description should include actual and potential species, productivity, and ground cover data, and should consider a range of annual precipitation.	The FEIS contains sufficient information to provide a correct of level analysis for the decision maker. Monitoring studies and inspection reports are available in FEIS Section 5.1 Appendix A- Literature Cited [Zobell and Goodrich (2005) - All Studies Pertaining to West Fk-Blacks Fk Allotment].
1.1b	WWP	The EIS must include maps, descriptions, and acres of soils and geology types.	Extensive information about the soil and geology resources is contained within the soil specialist report for the FEIS prepared by Oprandy and Flood. To clarify this, a reference to this report has been added to FEIS section 3.1.
1.1c, 1.1f	WWP	The EIS must include maps of capable/uncapable lands, and a calculation of available forage with the number of livestock and wildlife that this will support.	FEIS Chapter 1, Section 1.8.2.2 of FEIS includes and updated description of the process used to determine capable and suitable range acres within the allotment.
1.1g, 1.1h	WWP	The EIS must include an analysis of historic livestock use and range studies. The analysis should include a discussion of present trends and changes in condition from management changes.	FEIS Chapter 1, Section 1.8.2.3.6, Grazing Capacity/ Stocking Rates/Utilization Monitoring has been added to the FEIS. It indicates that the permitted use on the allotment was as high as 4,661 sheep months in 1916. Currently 2580 sheep months use are allowed on the allotment. All monitoring studies and inspection reports are available in FEIS Section 5.1 Appendix A- Literature Cited [Zobell and Goodrich (2005) - All Studies Pertaining

Letter Number	Name	Comment	Response to Comment
			to West Fk-Blacks Fk Allotment].
1.1h	WWP	The EIS must include an analysis of fisheries and stream habitat.	The analysis of the fish resources and their habitat is found in section 3.2.5 and 3.2.6 in the FEIS. Additional information, collected in 2005, was added to the FEIS.
1.1h, 1.1j, 1.1m	WWP	The EIS must include an analysis of water quality and stream bank condition. A model of the WFBF watershed should be made to determine the annual stream flow hydrograph for each alternative. An explanation of how continued livestock grazing will restore the watershed and clean water should also be included.	Water quality is analyzed in FEIS Section 1.8.2.3.3. Streambank condition is analyzed in FEIS section 1.8.2.3.4. A model of the WFBF watershed is not included in the analysis because it is not relevant to issues that have been identified.
1.1h, 1.1j, 1.1m	WWP	The EIS must include an analysis of wildlife population numbers, species and habitat. An explanation of how continued livestock grazing will ensure the viability of wildlife populations should also be included.	The Forest Service is not required to analyze all wildlife population numbers, species and habitat. This is the intent of MIS. MIS are covered in Section 3.2.2 of the FEIS. Section 3.2.1 discusses all terrestrial wildlife groups such as "big, small, avian and terrestrial wildlife"; bighorn sheep, wolf, Canada lynx, wolverine, and threatened, endangered, and sensitive species as discussed under Issue 2 in Chapter 1 of the FEIS. Aquatic species are discussed in Section 3.2.5 of the FEIS.
1.1i	WWP	The EIS must include a summary of past allotment management goals and the results of their implementation.	Past allotment the Revised Forest Plan Goals, Objectives, Standards and Guidelines have replaced management goals. They are found in the FEIS Section 1.6.
1.1k, 1.1l	WWP	The EIS must describe how the achievement of EIS vegetation and watershed related goals will be monitored.	140 monitoring studies are located on the West Fk-Blacks Fk Allotment. They are designed to monitor changes in resource conditions and to monitor for compliance with the Revised Forest Plan Standards and Guidelines (FEIS Section 5.1 Appendix A- Literature Cited [Zobell and Goodrich (2005) - All Studies Pertaining to West Fk-Blacks Fk Allotment]) The established studies will continued to be monitored. The Record of Decision specifies the monitoring that will be conducted in the future.

Letter Number	Name	Comment	Response to Comment
1.1m	WWP	The EIS must explain how continued livestock grazing will restore the watershed and ensure clean water	The intent of livestock grazing is not to restore the watershed. Forest-wide direction as described in Section 1.6.1.2 Goals, Forestwide Goal 2 – Watershed Health of the FEIS is to maintain and or restore overall watershed health. Water is clean as indicated by water in this watershed meeting Utah water quality standards as presented in Section 1.8.3.2 of the FEIS.
1.1n	WWP	Data provided in USDA (1999) shows that total ground cover decreased unacceptably between 1961 and 1997 on a key area of the allotment.	The 1961 study was a range analysis site analysis study that was not located on the same site as the 1997 Nested Frequency study. This was determined by examining range analysis aerial photos. The study methodology and the different sites make the data non-comparable for ground cover trend indication. However, FEIS, Appendix D, Synopsis of Study17-6A/BM No.4 explains that the ground cover measurements taken in 1965, 1966, 1967, and 1999 were conducted using the same methodology and in the same area. Ground cover in 1965, 1966, 1967, and 1998 measured 50%, 61%, 66%, and 70% respectively. This indicates a stable to upward trend in ground cover at this site. The Nested Frequency study, W17-6A, at this site measured 47.6% ground cover in 1997, 63% in 2004, and 63% in 2005, DEIS Table 3-2. This also indicates stable to increasing ground cover conditions. However, ground cover conditions at this site may be more of a factor of gopher activities and as such, ground cover conditions may follow the trend of gopher activities.
1.2a	WWP	The DEIS did not make a site specific determination of individual pasture capability, suitability, forage availability/allocation, or length of season for sheep grazing. No evidence was provided that Forest Planning provided an adequate enough analysis of these factors to allow for carryover to this project.	FEIS Chapter 1, Section 1.8.2.2 of FEIS includes and updated description of the process used to determine capable and suitable range acres within the allotment
1.2b	WWP	The DEIS did not provide an analysis of various soils and erosion characteristics.	A discussion of existing soil conditions, including erosion characteristics and causative agents, is contained within FEIS Sections 3.1.1 (Alpine Soils), 3.1.5 (Upland Soils and

Letter Number	Name	Comment	Response to Comment
			Wet Meadows).
1.2c	WWP	The DEIS did not provide an analysis of current and potential plant community distribution, species, and productivity; nor did it determine current range condition.	140 monitoring studies are located on the West Fk-Blacks Fk Allotment. They are designed to monitor changes in resource conditions and to monitor for compliance with the Revised Forest Plan Standards and Guidelines. All monitoring studies and inspection reports are available in Zobell and Goodrich (2005 - All Studies Pertaining to West Fk-Blacks Fk Allotment).
1.2d	WWP	The DEIS did not analyze forage competition between big game species and sheep grazing allowed under the action alternatives.	Section 3.2.4.1 of the FEIS discusses the environmental effects of the alternatives on big game.
1.2e	WWP	The DEIS clearly shows that the action alternatives do not allow for Revised Forest Plan DFC wilderness attributes to be achieved.	Summaries of Desired future conditions (DFCs) specifically for the High Uintas Wilderness were added to Chapter 1 of the FEIS for clarification. As presented in the Wasatch-Cache National Forest Revised Plan the DFCs are conditions that we are striving for but may not necessarily meet in the planning period of the Revised Forest Plan. Although the current conditions may not be meeting the DFC for all of the wilderness or watershed values, the trend appears to be maintaining or improving conditions and not trending downward. This is shown in Section 3.1.3.2 Effects on Alpine Soils, Proposed Action, where soil disturbance is expected to meet Forest Plan Guideline G4 and in Section 3.1.4.3 Effects on Alpine Plant Communities, Proposed Action, where ground cover conditions are expected to meet or exceed Forest Plan standard of 85% of potential. Wilderness attributes are analyzed in Section 3.3.

Letter Number	Name	Comment	Response to Comment
1.2f	WWP	The DEIS did not analyze and disclose the effects of past, present, and proposed grazing schemes on current range conditions, and in particular grazing sensitive plant species.	140 monitoring studies are located on the West Fk-Blacks Fk Allotment. They are designed to monitor changes in resource conditions and to monitor for compliance with the Revised Forest Plan Standards and Guidelines. Sensitive plant species are addressed in the biological evaluation, Goodrich 03 Jan 2006. This reference is included in the FEIS 5.1 Appendix A- Literature Cited. All monitoring studies and inspection reports are available in Zobell and Goodrich (2005 - All Studies Pertaining to West Fk-Blacks Fk Allotment).
1.2g	WWP	The DEIS did not address the effects of livestock grazing and trampling on plant production, soils, and nutrient cycling.	The FEIS provides extensive disclosure about the effects of the proposed action and its alternatives on plant composition, vigor and ground cover (sections 3.1.4 and 3.1.8). Impacts such as soils trampling, compaction, and erosion are discussed in the FEIS sections 3.1.3 and 3.1.7 (Direct and Indirect Effects). The effects of sheep grazing and trailing on overall soil quality and productivity can be found in the cumulative effect disclosures of FEIS sections 3.1.3 and 3.1.7.
1.2h	WWP	The DEIS does not report a quantitative measurement for usage of desirable/intermediate/undesirable forage species by sheep, and in particular on those upland areas preferred by sheep such as the alpine benches in unit 4.	FEIS Appendix C Utilization Summary summarizes utilization of key species for the lower three units for 10 different years, light to moderate use overall. It also reports green line stubble heights for 5 different, greenline stubble height >6". Unit Examination records R4-2200-15, 1997 thru 2003 indicate light to moderate use in lower 3 units. Range Specialist Report (Zobell 2004) estimates utilization of key species in the alpine to be light to moderate. Unit Examination records R4-2200-15, 1997 thru 2003 indicate primarily light use in the alpine and greenline stubble heights >6" in the alpine.
1.2i	WWP	The DEIS does not compare the respective amounts of damage that hikers, horse packers, sheep trailing, and permittees do to the trails in the allotment.	Trailing is addressed in FEIS cumulative effects sections.

Letter Number	Name	Comment	Response to Comment
1.2j	WWP	The DEIS needs to address whether "lost" sheep (sheep left behind after the grazing season ends) are considered predator losses.	Predator losses are tracked by APHIS Wildlife Services and not by the Forest Service. Data received from Wildlife Services for the 2005 field season have been added to Chapter 3. Predator control is analyzed in the FEIS, Chapter 3, Section 3.2.1.5 and 3.2.4.4.
1.2k	WWP	The DEIS does not analyze in detail the effects of domestic sheep on bighorn sheep, in particular within the context of the WFBF and surrounding watersheds.	Bighorn sheep are discussed in Section 1.8.2.1 of the EIS. Additions have been made to put the subject in context with the UDWR's Unit Management plan for the North Slope Unit (2004-2010).
1.2l	WWP	The DEIS does not analyze in detail the effects of domestic sheep on stream banks. The DEIS does not disclose the effects of vegetation removal, soil compactions, and no time for plant regrowth on accelerated stream flows during snow melt and rain storms.	FEIS section 1.8.2.3 "Issues Not Relevant to the Decision to be Made" contains a thorough analysis of stream conditions within the WFBF allotment, and reaches conclusions about the causative factors behind current conditions. The effects of vegetation removal (amount, timing, duration) by sheep grazing as a factor on stream conditions were evaluated as part of this analysis. As discussed in this section, and because the analysis found that these conditions were largely related to natural conditions, the issue of sheep grazing impacts on streams was not carried forward for further detailed analysis within the disclosure of environmental consequences for the proposed action and its alternatives.
1.2m	WWP	The DEIS does not explain why bank damage is occurring on smaller streams in the allotment that were not subject to the effects of historic tie hacking and avalanches.	FEIS section 1.8.2.3 .4 discusses the existing condition of small tributary streams within the allotment, finding that these streams have dense and vigorous vegetation growing along them and show very little signs of sheep grazing.
1.2n	WWP	The DEIS does not disclose the current distribution of rare plant species, whether these species occur in areas used by sheep, and if they are actually safe from grazing and trampling.	Sensitive plant species are addressed in the current biological evaluation, Goodrich 03 Jan 2006. This reference is included in the FEIS 5.1 Appendix A- Literature Cited.

Letter Number	Name	Comment	Response to Comment
1.2o	WWP	The DEIS does not disclose the cumulative impacts of sheep grazing and predator control in this allotment on the nearby watersheds that make up a Regionally Significant Wildlife Corridor. In particular, the DEIS did not analyze the impacts on lynx, wolverine, and snowshoe hare.	Predator control is addressed in the FEIS, Chapter 3, Section 3.2.1.5 and 3.2.4.4. Through the planning process there has been much discussion of the Uinta Mountains being a "Regionally Significant Wildlife Corridor. Whereas the Uinta Mountains are an important east-west corridor, the Wasatch-Cache does not recognize them as a "Regionally Significant Wildlife Corridor." The "Regionally Significant Wildlife Corridor" as put forth in the Revised Forest Plan refers to the narrow bottleneck on the Logan and Ogden Ranger Districts. This bottleneck connects the broad forested areas of northern Idaho, western Wyoming and Montana to the broader forested areas of the Wasatch Range going down into southern Utah, the Uinta Range and the southeasterly path through Book Cliffs into the forested areas of Colorado. By comparison, the Bear River Range through the Logan and Ogden Ranger Districts is 15-20 miles wide and well roadbed where the Uinta Mountains are 40-50 miles wide, with a backbone of wilderness bordered in many places with roadless areas. In the Revised Forest Plan reference to the "Regionally Significant Wildlife Corridor" is only discussed in sections on Bear, Cache/Box Elder, and North Wasatch/Ogden Valley Management Areas (pgs. 4-141, 4-132, 4-143). See Lynx (section 3.2.3.1), wolverine (section 3.2.3.2), and snowshoe hare (section 3.2.2.2) for analyses.
1.2p	WWP	The DEIS does not disclose the role of sheep in transmitting giardia or Q fever.	We agree with your comment. Information that discloses the risk of transmission of <i>Giardia</i> and Q fever to humans has been incorporated in section the FEIS 1.8.2.3.
1.2q	WWP	The DEIS does not disclose the relative effect of livestock grazing in the WFBF to local and regional economies, in comparison to economic values displaced by sheep grazing.	The FEIS Issue 5: Economic/Social Values, was narrow in scope only to discuss the economic impacts on Uinta County, Wyoming and the permittee. Broader values including ecological and recreation are discussed in the Chapter 3 of the FEIS.

Letter Number	Name	Comment	Response to Comment
1.2r	WWP	The DEIS failed to document where the snowbeds and gopher activity occur or their aerial extent within any mapping analysis.	We agree. Mapping of these sites have not been done. Several monitoring studies are located in snowbeds. These studies provide condition and trend without mapping. All monitoring studies and inspection reports are available in Zobell and Goodrich (2005 - All Studies Pertaining to West Fk-Blacks Fk Allotment).
1.2s	WWP	The DEIS failed to spell out the details of sheep trailing in terms of management, numbers, or days within the WFBF allotment.	Section 1.8.2.1, Sheep Trailing to Ashley National Forest, has been changed to include the number of sheep and days spent trailing across the West Fork Blacks Fork Allotment.
2a	WWC	Impacts of Ashley Sheep trailing through WFBF should be discussed in detail and an alternative that eliminates this use should be analyzed or reasons for not including this as an alternative should be disclosed.	Section 1.8.2.1, Issues Outside the Proposed Action, Page 1-12 FEIS addresses the Ashley sheep trailing as a non connected issue and as such no decision is being made from this analysis regarding that trailing. The Ashley trailing is administered under a grazing permit issued by the Ashley N.F. and as such trailing onto the Ashley N.F allotment is considered a connected action with that permit. The affects of trailing and grazing sheep on other allotments will be analyzed when the National Environmental Policy Act documents are completed for those allotments. Affects of the trailing Ashley herd across the allotment itself are disclosed under the cumulative effects portions of FEIS sections 3.1.4, 3.1.7, 3.1.8, 3.1.10, 3.1.11, as well as FEIS sections 3.1.6.3 and 3.1.6.4.
2b	WWC	Reasons why Alternative C is preferred (over Alternative A and over historic grazing regime), and what problems it will solve (in particular soil erosion), evidenced by literature (well reasoned and scientifically-grounded reasoning) should be discussed.	The FEIS Record of Decision will discuss the rationale behind the selection of either the proposed action or one of its alternatives. FEIS sections 3.1.1 and 3.1.6 provide a comprehensive discussion of the concern over current soil conditions and trends, supported by many references to scientific papers and studies.
2c	WWC	Questions the comparison with Amethyst Basin not including (?) the areas of soil erosion on the alpine benches stating that if they had, the conclusion would have been that ground cover standards weren't being met warranting a reduction or cessation of grazing on the benches.	The FEIS compares similar plant communities of Amethyst Basin with those of West Fk-Blacks Fk. Using the Amethyst sites as a reference indicates the grazed area is not different than the ungrazed area.

Letter Number	Name	Comment	Response to Comment
2d	WWC	The DEIS does not adequately address (not an appropriate level of sophistication) the relationships between grazing, gophers, geomorphic processes, and soil erosion. The DEIS does not take into account relevant research on the grazing and tunneling activities of gophers.	Evidence provided by monitoring studies indicates pocket gophers are the primary agent of reduced ground cover, and where sheep graze in the absence of gophers, ground cover has been maintained to near 100% (see FEIS Section 5.1 Appendix A- Literature Cited Goodrich and Zobell 2006-Feb.) Effects of pocket gophers is also included in a reference in the DEIS Appendix A -Literature Cited. In the FEIS this is found in 5.1 Appendix A - Literature Cited [Goodrich (2004) pages 5-8]. The FEIS concludes that Revised Forest Plan soil quality guidelines (guideline G4) are being met under the proposed action and its alternatives, i.e. that detrimental soil disturbances due to management activities do not occur on more than 15% of an activity area.
2e	WWC	Given the concerns about grazing's cause and effect on soil erosion, a capability and suitability analysis is warranted for the alpine basins.	FEIS Chapter 1, Section 1.8.2.2 of FEIS includes and updated description of the process used to determine capable and suitable range acres within the allotment
2f	WWC	Disagrees with DEIS (and/or USFWS) conclusion that there has never been a resident Canada lynx population in the state of Utah. Disagrees with conclusion that livestock grazing in WFBF is not detrimental to lynx.	Thank you for your comment.
2g	WWC	DEIS fails to address the importance of the Uinta Mountains as a linkage corridor for lynx.	See response to 1.2o, September 30, 2005.
2h	WWC	DEIS should address the cumulative effects on Canada lynx of livestock grazing in the WFBF combined with grazing across the entire Uinta Mountains	Discussion on lynx is summarized in Section 3.2.4.5 of the FEIS.

Letter Number	Name	Comment	Response to Comment
2i	WWC	DEIS does not adequately address whether grazing under Alternative C compromises wilderness characteristics. It fails to recognize any objective, non-arbitrary criteria that must be met by any grazing regime to protect wilderness characteristics. Asks whether "localized" effects add up to something that detracts from wilderness characteristics. References the Wilderness Act and the Revised Forest Plan as criteria for determining whether grazing is compromising wilderness characteristics.	Effects of grazing on wilderness characteristics are analyzed in the FEIS sections 3.4.2, "Wilderness and Back Country Recreation Experience and Values" and 3.4.3 "Current Situation-Effects on Recreational Experience and Values".
2j	WWC	Effects of grazing on recreation experiences is not adequately treated in the DEIS. Even though experiences are based on the views and values of the experience, it can be expected that those who seek a wilderness recreation experience generally will find the smells, sights and sounds resulting both immediately and after grazing to significantly impact their experience in a negative way. The significance of impacts is downplayed in the DEIS. [Uses the word "arbitrary" to describe the apparent decision, when there is such a large gap between the facts and the decision supposedly based on them.]	Effects of grazing on wilderness characteristics are analyzed in the FEIS sections 3.4.2, "Wilderness and Back Country Recreation Experience and Values" and 3.4.3 "Current Situation-Effects on Recreational Experience and Values".
2k	WWC	DEIS discounts any impacts that conflict with a pro-grazing alternative if they cannot be quantified- examples: probability of higher recreation use of WFBF if grazing was removed: People who seek wilderness experiences do seek them where the quality is likely to be high, therefore the probability is good and should not be dismissed.	Section 3.4.4.1 of the FEIS was expanded to discuss this point.
2l	WWC	DEIS neglects to discuss economic and social impacts of Alternative A other than those on the permittee, such as citizens who might recreate here in the absence of grazing and their potential economic activities in the nearby communities.	Section 3.4.4.1 of the FEIS was expanded to discuss this point.

Letter Number	Name	Comment	Response to Comment
2m	WWC	The Forest Service (government stewards of public land) could be more honest by not downplaying the impacts of grazing to watershed, wildlife, and wilderness, regardless of the decision it chooses to make.	The FEIS discloses the effects of grazing to watershed, wildlife and wilderness and other critical resources. The effects analysis is the work of interdisciplinary resource specialists and reflects their professional, honest evaluation.
3a	UEC	The EIS must be revised such that it treats water and the distribution, status, and trend of sensitive plant populations and habitats as sensitive issues.	We agree that water quality is an important resource within the WFBF allotment. Accordingly, FEIS section 1.8.2.3.3 treats water quality as an important resource within the analysis area, but that the effects on it from the proposed action are very minor or have been effectively mitigated. See answer to 3gg regarding plants.
3b	UEC	Because impacts of grazing to designated wilderness is a significant issue it is self evident that an alternative that proposes no permitted sheep inside the Wilderness (but permits sheep grazing outside the designated Wilderness) would need to be developed and analyzed.	Consideration of this alternative has been added to the Section "Alternatives Considered But Not Analyzed in Detail".
3c	UEC	The EIS is also insufficient under NEPA and NFMA because it holds the stream bank erosion is not relevant to the decision to be made.	We agree that streambank conditions are an important resource within the WFBF allotment. Accordingly, FEIS section 1.8.2.3.4 treats stream bank conditions as an important resource within the analysis area, but that the effects on it from the proposed action are very minor or have been effectively mitigated.
3d	UEC	Alternative D should not have been dismissed from detailed analysis in the EIS.	Alternative D is similar to the Proposed Action, Alternative C except that the alpine area (Unit 4) is grazed every year. This Alternative does not address concerns about effects of annual grazing on the alpine benches and does not adjust grazing to increase the potential for improved ground cover/soil conditions in these areas thus not meeting the purpose and need for action. NEPA does not require a separate analysis of alternatives which are not significantly distinguishable from alternatives actually considered, or which have substantially similar consequences. See FEIS, Chapter 2, Section 2.3.

Letter Number	Name	Comment	Response to Comment
3e	UEC	Both grazing alternatives (b and c) fail to adhere to the Forest Plan, NFMA, FSH/FSM, and Conservation Agreement direction for improving the distribution, status, and trend of populations and habitats of sensitive species such as Colorado River cutthroat trout (CRCT).	The FEIS is in compliance with the Revised Forest Plan, NFMA, and applicable Forest Service Handbook and Manual direction. Colorado River cutthroat trout (CRCT) are addressed in Chapter 3, section 3.2.5.
3f	UEC	An alternative that includes some grazing while achieving the reductions in fish spawning, riparian and TES/MIS prey species impacts realized in the no grazing alternative must be developed.	The Responsible Official has the option of modifying an alternative in her decision as long as the decision's effects are within those disclosed in the EIS.
3g	UEC	We believe that grazing alternative would meet issue 5 (economic/social stimulus) and all other issues, would allow permitted sheep grazing, would actually meet direction for aquatic, riparian, and sensitive species resources outlined above, would be environmentally preferable alternative, and would make an ideal alternative to select in the ROD.	Thanks you for your comment.
3h	UEC	The cumulative impact analysis to every issue and resource addressed in the DEIS is legally and substantively inadequate.	Cumulative impacts are addressed in Chapter 3.
3i	UEC	The body of scientific research suggests that annual adjustments in grazing intensity may do nothing significant to resolve the negative impacts of reduced water infiltration rates, which impacts wetlands, municipal watersheds, and thereby TES species/habitat, and other extraordinary circumstances.	Additional literature is included in the FEIS that addresses these issues. These include Molinar et al. 2001. Goodrich and Zobell (2006-Feb.) xx This literature indicates plant cover can be maintained or increased with light to moderate grazing which have resulted in negligible increases in soil erosion.
3j	UEC	In the case at hand with these grazing allotments that cover thousands of acres, extraordinary circumstances that are obviously significantly impacted include TES species and their habitat, floodplains, wetlands, municipal watersheds. The EIS fails to disclose or analyze these impacts.	Extraordinary circumstances are directly applicable to actions that are categorically excluded from documentation (See FSH 1909.15, Chapter 30). The EIS addresses resources that are pertinent to the proposed action and alternatives to it. TES is addressed in Chapter 3, section 3.2.3 and 3.2.5. Relevant issues to hydrology/riparian areas are addressed in Chapter 3.

Letter Number	Name	Comment	Response to Comment
3k	UEC	The NEPA document must not focus so much on describing the effects of the proposed action on range resources (e.g. fences and transitory range) as the DEIS does, but focus on disclosure and analysis of the effects "of" livestock on forest health, other extraordinary circumstances, soil, growth inducing effects, and the desired future conditions that are in the Forest Plan.	The reviewer must have confused this EIS with another one. No effects on fences and transitory range are discussed in the EIS. The EIS does disclose effects to important resources such as soil and vegetation, which are part of the desired condition outlined in the Revised Forest Plan.
3l	UEC	The combination of fire suppression, past high-grading, and livestock grazing together caused the overstocked condition of the stands in the analysis area. Grazing, fire suppression and logging cause cumulative effects that must be considered together in one environmental document prepared to analyze the proposed action to renew the grazing allotment as proposed, or in the alternatives.	Again, the reviewer must have confused this EIS with another one. There is no mention of overstocked stands within the allotment. The incremental impact of grazing in combination to other activities in the area has been disclosed under cumulative effects in Chapter 3.
3m	UEC	Livestock Effects from the proposed action on Plant Communities as they relate to forest health not adequately disclosed or analyzed in DEIS.	There are about 140 monitoring studies on the Allotment. These monitor condition and trend of plant communities as they relate to forest health. These are found in FEIS Section 5.1 Appendix A- Literature Cited [Zobell and Goodrich (2005) - All Studies Pertaining to West Fk-Blacks Fk Allotment]. FEIS Section 5.1 Appendix A- Literature Cited includes a summary of these studies (Goodrich and Zobell 2006-Jan).
3n	UEC	These cumulative effects between livestock grazing as outlined in the proposed action and alternatives in the DEIS and forested vegetation have resulted in serious and costly fire related issues and loss of wildlife habitat that are significant across the North slope and affected area of the Uintas.	Wildlife habitat has not been lost due to fire. It has been modified. These modifications have been beneficial to some wildlife species and detrimental to others. Effects to wildlife species relevant to the project area have been analyzed in Chapter 3.
3o	UEC	While Kay cites other research indicating that wildlife have impacts on aspen regeneration, he states that in all cases where aspen is protected from livestock, it successfully regenerated and formed multi-aged stands without fire or other disturbance.	The 1965 Allotment Management Plan summarized acres of vegetation types found on the allotment from a 1961 range analysis. No aspen is found on the allotment. Aspen is not expected to be found above the lowest elevation of the allotment 9,400 feet.

Letter Number	Name	Comment	Response to Comment
3p	UEC	Effects of Livestock Grazing in proposed action and alternatives in DEIS not meaningfully analyzed for Deer, Elk, and game birds, such as grouse species.	See Section 3.2 of the FEIS
3q	UEC	Effects of Livestock Grazing outlined in proposed action and alternatives in DEIS on Watersheds and Water Quality.	See comment Number 1.2L.
3r	UEC	Stream Channel Morphology is affected by grazing as outlined in the Proposed Action/alternatives and alternatives is avoided instead of treated as the significant issue that it is in the EIS (raised earlier as well).	See comment Number 1.2L.
3s	UEC	Sedimentation is increased due to grazing as outlined in the proposed action/alternative B but not adequately disclosed or analyzed in the DEIS.	Sedimentation is discussed in Section 1.8.2.3 of the FEIS. It identifies that the high sediment supply in West Fork Bear River is from natural delivery from the cirque headwalls and numerous tributaries of the drainage. Stream bank erosion is one of the main suppliers of sediment to a stream and Section 1.8.2.3 concludes that sheep have very little effect on the stream banks. The issue of sheep grazing impacts on streambanks was not carried forward for further detailed analysis within the disclosure of environmental consequences for the proposed action and its alternatives.
3t	UEC	Stream flow is affected by grazing as outlined in the proposed action/alternatives but that is not adequately disclosed or analyzed in the DEIS.	See comment Number 1.2L.
3u	UEC	Nutrient flow/concentrations are affected by grazing outlined in the proposed action/grazing alternative, but this is not disclosed or given meaningful analysis in the DEIS.	Water quality is discussed in Section 1.8.2.3.3 of the FEIS. Because this information shows that water in the watershed is meeting Utah state standards, no further detailed analysis was needed.

Letter Number	Name	Comment	Response to Comment
3v	UEC	Aquatic habitat/stream/river temperature is affected by grazing outlined in the proposed action/alternative B, but the DEIS disclosure, analysis, and alternative development in response to this significant issue is inadequate	Table 3.22 in the FEIS shows that all reaches are within acceptable temperature ranges. No alternative puts additional livestock in the allotment above the existing condition and thus no increase in water temperature is expected. Additional language will be added to FEIS sections 3.2.6.1, 3.2.6.2, and 3.2.6.3 to reflect this.
3w	UEC	Dissolved Oxygen is affected by grazing in the proposed action/alternative B but that also is not adequately disclosed or analyzed in the DEIS.	Dissolved oxygen is one of several parameters that are collected as part of the cooperative water quality monitoring program that the Wasatch-Cache National Forest has with the Utah Division of Water Quality. One of the water quality sampling sites is located on the West Fork Blacks Fork and dissolved oxygen sampled there has met Utah State dissolved oxygen water quality standards. As presented in Section 1.8.2.3.3. the water quality issue is not carried forward in a detailed analysis since water in the West Fork Blacks Fork is meeting Utah water quality standards.
3 x	UEC	Pathogens are increased by grazing of the kind specified in the proposed action/alternative B but that also is not adequately disclosed or analyzed in the DEIS.	We agree with your comment. Information that discloses the risk of transmission of pathogens such as <i>Giardia</i> and Q fever to humans has been incorporated in section the FEIS 1.8.2.3.
3 y	UEC	We ask that the research on grazing in the interior west and Utah outlined earlier be used and incorporated into the effects analysis in the EIS.	Thank you for the suggestion. However, this FEIS uses about 140 monitoring studies that provide site-specific information for this allotment. These monitoring studies and inspection reports are available in FEIS Section 5.1 Appendix A- Literature Cited [Zobell and Goodrich (2005) - All Studies Pertaining to West Fk-Blacks Fk Allotment].
3 z	UEC	Since habitat for mollusks amphibians and tall forbs are directly impacted by current and proposed grazing levels, the Forest needs to modify the proposed action such that it address and resolves all direct and indirect impacts to mollusks, native amphibians and tall forb communities and their habitat.	The no action alternative addresses this issue. We do not believe that the alternatives need to be changed to address these concerns. Mollusks and amphibians are discussed in Chapter 3 of the FEIS, Sections 3.2.6.1, 3.2.6.2, and 3.2.6.3. Vegetation is addressed in Chapter 3, Section 3.1.

Letter Number	Name	Comment	Response to Comment
3 aa	UEC	The reasons for selecting the management indicator species used in the EIS analysis in the project area are not clear, and for some of the MIS used, the EIS seems to say that the selected indicator species are not expected to respond to these management activities that significantly impacts the human environment.	MIS species are selected at the Forest Plan Level and not the project level. Additional wording is added to the FEIS to explain this. The selection criteria are identified in the Forest Plan as identified in FEIS section 3.2.2.
3 bb	UEC	Migratory Bird Treaty Act, Executive Order 13186, and Neotropical migrants not adequately addressed in effects analysis.	Neo-tropical migrants identified by Partners in Flight and the FWS Birds of Conservation Concern as species of concern that use the vegetation types found in the allotment are identified in Section 3.2.1.4. The species that resulted from that process are discussed. They are considered by alternative in Section 3.2.4.3.
3cc	UEC	The EA seems to dismiss one aspect of predator control.	You are correct. A statement on bears and mountain lions has been added to the FEIS, Chapter 3, Section 3.2.1.5 and 3.2.4.4.
3dd	UEC	There are many other impacts to wildlife that argue in favor of the removal of livestock from our public lands, or at the very least a very significant reduction in their numbers.	Thank you for your comment.
3ee	UEC	These two species (lynx and wolverine), along with other management indicator species contained within the Wasatch-Cache LMRP received very little attention in the EA.	Thank you for your comment. MIS is analyzed in Chapter 3, section 3.2.2.
3ff	UEC	The UEC is concerned about impacts to the Colorado cutthroat trout not only because it is a sensitive species, but because its range appears to be rapidly shrinking due to competition with non-native trout, roads, grazing, and logging. To not include a section in the EA providing the public with information regarding possible impacts to this species resulting from continued grazing in the WFBF was irresponsible.	The analysis of the fish resources and their habitat, including Colorado River cutthroat trout, is found in sections 3.2.5 and 3.2.6 in the FEIS. Additional information, collected in 2005, was added to the FEIS.

Letter Number	Name	Comment	Response to Comment
3gg	UEC	The UEC is extremely disappointed in the failure to analyze the impacts of grazing on the sensitive plant species arctic poppy, rockcress draba, brownie ladyslipper, and Uinta greenthread. We would add Uinta parrya, Uinta beardtongue, and Marsh cinquefoil to this list.	The Biological Evaluation for sensitive plants (FEIS 5.1 Appendix A -Literature Cited and FEIS Section 5.6 Appendix F) discusses Uinta poppy, rockcress draba, and brownie ladyslipper as sensitive species. Uinta greenthread is eliminated from that evaluation because there is no possibility for this sensitive plant on the allotment. Uinta parrya and Uinta beardtongue were once listed as sensitive, but information gathered on these species demonstrated that they should not be listed. Marsh cinquefoil is not found on the allotment.
3hh	UEC	The EA fails to analyze the potential negative economic impacts grazing may be having on the area due to reduced hunting and fishing opportunities resulting from livestock/wildlife competition.	The DEIS Issue 5: Economic/Social Values, was narrow in scope only to discuss the economic impacts on Uinta County, Wyoming and the permittee. Broader values including ecological and recreation are discussed in FEIS, Chapter 3.
3ii	UEC	The UEC suggests a fourth alternative that includes reducing the number of sheep to between 500 and 750 and closing unit 4 altogether.	This suggested alternative would be very similar to Alternative B. Alternative B has a stocking rate of 875 sheep. Differences in the effects between the 2 would be very minimal and thus do not warrant its inclusion in the FEIS. In addition, stocking rates can be adjusted annually through the annual operating plan based on range conditions.
3jj	UEC	The Forest service must begin to plan for the possible return of the wolf to Utah.	Thank you for your comment.
3kk	UEC	The UEC is troubled by the failure of the Forest Service to provide the public with a cumulative effects analysis of the impacts this proposal would have on both sensitive plant species that "may exist" on the allotment and the impacts on Colorado cutthroat trout.	The analysis of the fish resources and their habitat is found in sections 3.2.5 and 3.2.6 in the FEIS. Additional information, collected in 2005, was added to the FEIS. Sensitive plants are analyzed in section 1.8.2.3.2.
3ll	UEC	We ask that some effort be made to evaluate the economics of the proposed action. This analysis should include the benefits of functioning ecosystems that do not include sheep, revenues from permittee fees, and costs of managing the allotment.	The DEIS Issue 5: Economic/Social Values, was narrow in scope only to discuss the economic impacts on Uinta County, Wyoming and the permittee. Broader values including ecological and recreation are discussed in FEIS, Chapter 3.

Letter Number	Name	Comment	Response to Comment
3mm	UEC	The UEC endorses the no grazing alternative.	Thank you for your comment.
4a	HUPC	The DEIS dismisses an analysis of wilderness because grazing is allowed in designated wilderness and can't be arbitrarily terminated simply because of wilderness designation. [Grazing's] impact to wilderness should be clear and worthy of analysis.	Effects of grazing on wilderness is analyzed in the FEIS sections 3.4.2, "Wilderness and Back Country Recreation Experience and Values" and 3.4.3 "Current Situation-Effects on Recreational Experience and Values".
4b	HUPC	The DES only analyzes specific financial impacts to the permittee. The analysis fails to disclose the insignificance of this sheep operation to Uinta County and fails to show the elasticity breadth, and resiliency of the Uinta County economy. The DEIS fails to show the non-agriculture, public, socioeconomic benefits	The DEIS Issue 5: Economic/Social Values, was narrow in scope only to discuss the economic impacts on Uinta County, Wyoming and the permittee. Broader values including ecological and recreation are discussed in DEIS, Chapter 3.
4c	HUPC	The wilderness attributes are "analyzed" within the Recreation section of the DEIS which is a notable oversight. And even within the context of recreation the analysis is faulty. The impacts must be clearly defined and articulated within the whole wilderness not within grazing units or compartments. The standard of law is grazing can be terminated if wilderness attributes are negatively affected by continued grazing.	The writer is correct, documentation of the effects to wilderness attributes are within the Recreation section but they are nonetheless disclosed. The DEIS contains sufficient information to provide a correct level analysis for the decision maker. Effects of grazing on wilderness attributes are analyzed in the FEIS sections 3.4.2, "Wilderness and Back Country Recreation Experience and Values" and 3.4.3 "Current Situation-Effects on Recreational Experience and Values".
4d	HUPC	The DEIS dismisses stream bank erosion because the DEIS argues that natural geomorphic processes have created high sediment and debris loads that altered streambanks. Missing from the analysis is the impacts of domestic sheep grazing and movement of sheep on stream banks and in particular the areas most affected by natural geomorphic processes. Because of the fragility of the streambanks created by natural processes domestic sheep grazing impacts are far more disruptive and can't be rendered as not significant.	See comment Number 1.2L.

Letter Number	Name	Comment	Response to Comment
4e	HUPC	The DEIS argues that because there are areas of bare soil due to low natural productivity that it is ok to exceed detrimental disturbance thresholds by domestic sheep grazing. The DEIS fails to analyze the impacts of sheep grazing throughout these fragile areas.	DEIS Section 3.1.1 concluded only that soil disturbance was observed in amounts that exceed Revised Forest Plan Guidelines at locations rated "impaired", that this occurred at 17% of the locations assessed, and that this disturbance could be due to either natural or grazing conditions, or both. Text will be added to the FEIS to clarify this. The impacts of sheep grazing on soils are disclosed in FEIS sections 3.1.3, 3.1.7, and 3.1.11. The FEIS concludes that Revised Forest Plan soil quality guidelines (guideline G4) are being met under the proposed action and its alternatives, i.e. that detrimental soil disturbances due to management activities do not occur on more than 15% of an activity area.
4f	HUPC	Reports are largely literature searches augmented by observations and some short-term study sites. The conclusions drawn are often speculative or based on very short-term study sites. Specialists' reports reflect the decision to allow grazing to continue rather than analyze the effects of grazing.	The data available to specialists represents many years of thorough, documented monitoring and analyses. We believe it is adequate for the Responsible Official to make a reasoned decision.
4g	HUPC	DEIS dismisses bighorn sheep issues by arguing the issue is too broad. The WFBF is excellent bighorn sheep habitat and bighorns are residing only a few drainages away. This approach fails to consider issues and the cumulative effects to the WFBF.	See response to 1.2k, above.
4h	HUPC	The DEIS states that the impacts to wildlife are limited because they can move and avoid the impacts of grazing. The DEIS cannot dismiss this issue without a meaningful analysis because the dispersal habitat within and without of the WFBF for the very sensitive species is minimal.	Impacts to wildlife go further than the statement in the comment. Section 3.2 addresses the impacts of livestock grazing on native wildlife and fish habitats.
4i	HUPC	The DEIS can't dismiss predator control and its implications toward species like lynx and wolverine and still meet the standards, guidelines, goals and desired future conditions associated with the Revised Forest Plan with respect to wilderness.	Predator Control is addressed in the FEIS, Chapter 3, Section 3.2.1.5 and 3.2.4.4.

Letter Number	Name	Comment	Response to Comment
4j	HUPC	The issue of trailing the Ashley herd is deemed to be non-significant. The DEIS argues trailing is not a connected issue even though the WFBF is the sheep driveway for the resident herd and the trailing herd.	See response for comment 2a.
4k	HUPC	Domestic sheep grazing impacts are negative and profound yet are dismissed simply because they are compared to natural processes.	The FEIS acknowledges that grazing affects resources in the West Fork Black Fork and determined that these affects are within Forest Plan standards and guidelines.
5a	BRWC	The DEIS analysis did not include a full and complete evaluation of the impacts of sheep grazing and trailing, nor did it disclose the extent of damage at other locations where sheep trailing is occurring.	Chapter 3 of the Final Environmental Impact Statement provides a full evaluation of the impact of sheep grazing on those West Fork Blacks Fork resources reflected in the significant issues analyzed by the FEIS (FEIS section 1.8.1). Affects of the trailing Ashley herd across the allotment itself are disclosed under the cumulative effects portions of FEIS sections 3.1.4, 3.1.7, 3.1.8, 3.1.10, 3.1.11, 3.1.6.3 and 3.1.6.4. An analysis of the affects of trailing West Fk-Blacks Fk sheep across the National Forest to the allotment has been expanded in Section 1.8.2.3.7 of the FEIS.
5b	BRWC	The DEIS analysis did not include an analysis of the regional significance of the WFBF and other adjacent grazed watersheds, nor their significance to the regionally significant wildlife corridor of which these areas are a critical part.	See response to 1.2o, above.
6a	Keith Askers	Basically, I think that Alternative C is completely indefensible and I support Alternative A, the No Grazing Alternative, instead. The only problem I have with Alternative A is that it allows trailing of sheep through this area to other areas: in my opinion, trailing should be eliminated as well.	Thank you for your comment. Trailing of the West Fork Blacks Fork sheep is analyzed in the FEIS as a connected action. Trailing of other sheep through the West Fork Blacks Fork allotment is discussed, but is not part of the proposed action, and therefore is not part of this decision.
7a	Bill Laycock	The comparisons among Alternatives seem to be logical for the most part. An exception is the statement under "2. Native Wildlife and Fish Habitats" where, for Alternative C, that small game and small mammals are "more vulnerable to predation in grazed areas". I do not believe that the statement is true or that any data exist to validate this statement. The section on Small Mammals in Chapter 3, Native Wildlife and Fish	Thank you for your comment. We agree with you. The statement has been removed.

Letter Number	Name	Comment	Response to Comment
		Habitats (p. 30-31) does not mention this point or provide any information to validate this statement. Therefore, it should be removed from both places.	
7b	Bill Laycock	Non-significant Issues–Sheep Trailing to Ashley National Forest (p. 12): On my visits to the allotment, I believe that the concentrated movement of outside sheep while trailing through the allotment causes a great many of the objections raised by recreationists.	We agree.
7c	Bill Laycock	Issues Not Relevant to the Decision to be made: Stream Banks (p, 14-16): It would seem to be that the statement that “almost all of the stream bank instability is associated with natural conditions (1st full paragraph on p. 15) and the discussion of Avalanche Effects on Stream Banks (p. 165) are highly relevant to the decision.	See comment Number 3c.
7d	Bill Laycock	Issues Not Relevant to the Decision to be made: Livestock Effects on Streambanks (p. 15-16): Are the two areas where there is evidence of sheep impacts to streambanks a result of the resident herd of the permittee or caused by the trailing herds?	The two areas where there is evidence of sheep impacts to streambanks is a result of the resident herd. One is in the upper end of the Buck Pasture and the other is in Unit 4 B; they are documented in Studies 27-2 and 17-2H. 27-2 is located south the trailing route of the Ashley herd and 17-2H is located west (west side of the river) of the Ashley trailing herd route. Stream Banks are discussed in the FEIS, Chapter 1, Section 1.8.2.3.4.
7e	Bill Laycock	The narratives about stream bank instability being natural, the effects of avalanches on sediment loading of the stream and the lack of effect of sheep grazing on streambanks need to be moved from the section on “Irrelevant Issues” to the appropriate sections elsewhere in the DEIS.	See comment Number 3c.
7f	Bill Laycock	Comparison of Greenline Vegetation (p. 16-17): This information might need a little more explanation. The narrative does not seem to adequately explain the numbers.	The classification of early and late seral communities is from Winward (2000). In general the higher percent of late seral communities along the greenline indicates higher streambank stability.

Letter Number	Name	Comment	Response to Comment
7g	Bill Laycock	Comparison of Greenline Vegetation (p. 16-17) Wouldn't the 96% for first order streams and the 91% for WFBF above avalanche be classified as Climax or Potential Natural Community (PNC) instead of Late Seral?	We agree some of these could be listed as Potential Natural Community. However, these ratings are taken from Winward (2000) in which only early and late seral ratings are listed.
7h	Bill Laycock	Mitigation and Management Requirements Common to All Alternatives (2-1) Percent utilization (Table 2-1): Why is Crested Wheatgrass listed in this table?	The Table is from the Wasatch-Cache Revised Forest Plan. Crested Wheatgrass does not occur on this allotment, but it does occur on other sites of the Wasatch-Cache N.F.
7i	Bill Laycock	It might be useful to the reader to give a definition of Riparian Classes I, II and III for those who don't have access to the Forest Plan and are not familiar with the classifications.	Definitions of Class I, II, and III have been added to the FEIS, Section 5.5 Glossary.
7j	Bill Laycock	Mitigation and management Requirements Common to Grazing Alternatives B and C: Herder Camps (p. 9): This requires that garbage be packed out by the permittee. Are there similar requirements for recreationists and hunters? Obviously there are serious consequences if the permittee does not conform to this requirement. Are there similar consequences for hunters or recreationists who do not pack their garbage out?	Special Order #04 19 43 specifically requires wilderness visitors, whether permittees or recreationalists, to pack out their garbage or face being punished with "a fine of not more than \$5,000 or imprisonment for not more than 6 months or both. (Title 16 USC 551)."
7k	Bill Laycock	Alpine Plant Communities p. 3-7 and also the section on Effects on Alpine Plant Communities [p.13-16]: In previous documents, the desirability of erecting a take-down enclosure in one of the alpine communities was proposed. Why was this enclosure proposal not included here?	The possibility of erecting an enclosure in the alpine was considered to help determine the on site ground cover potential at Study Site W17-6A. Continued monitoring and literature search has yielded sufficient information to be able to make ground cover potential estimates in the alpine. See FEIS, Table 3-2.
7l	Bill Laycock	Literature to support any connection between pocket gopher populations and sheep grazing because this has been a contention of many critics, i.e., that sheep grazing causes pocket gopher populations to increase. No published or unpublished scientific evidence exists to validate this opinion.	This is generally indicated in the literature available to us. FEIS (5.1 Appendix -A Literature Cited) relationships between livestock grazing and gophers are discussed in the following: Goodrich (2005-CN), Goodrich (2006-LP), Goodrich and Huber (2005-JP), Goodrich and Huber (2005-PT), Goodrich and Zobell (2006-BF), Goodrich and Zobell (2005-HF), Goodrich and Zobell (2006-Feb.), Goodrich (2006-PG).

Letter Number	Name	Comment	Response to Comment
7m	Bill Laycock	Effects on Upland Soils Alternative B--Discontinue Grazing Unit 4 and C-Proposed Action--Direct and Indirect Effects (p. 21): The statement that "Soil structure in bare ground areas will continue to be broken down during dry conditions and wet soils will continue to be detrimentally compacted by trampling" has no basis. I think that this should be removed as does Dr. Skinner.	We agree. The FEIS will be edited to reflect this.
7n	Bill Laycock	Effects on Upland Soils Cumulative Effects (p. 21-22): The statement (p. 22) that continued recreation trail use and grazing "will continue to be agents of loosening dry surface soil over this activity area" seems to be such an insignificant effect that it hardly seems worthy of mention.	Thank you for your comment. We prefer to retain all disclosures of effects, no matter how minor they may be, within the FEIS.
7o	Bill Laycock	Effects on Upland Plant Communities: Alternative C--Proposed Action--Direct and Indirect Effects and Cumulative Effects (p. 25): The point is made under "Cumulative Effects" that the trailing sheep and recreational horses are part of the cause for any small problem areas but this point could be made stronger and more prominent.	Thank you for your comment; we believe the emphasis made on this point is appropriate.
8a	Quentin Skinner	Chapter 1. Purpose and Need for Action, Page 2 - paragraph 5 (See Non-Significant Issues in the last section of this DEIS Chapter). The discussion of the streambank, stream channel, and watershed conditions presented is excellent. I would hope that the final EIS would do more to emphasize this segment as I do not see it as a non-significant issue but as a way of setting precedence for considering science instead of opinion in preparation of future EIS documents.	See comment Number 3c.
8b	Quentin Skinner	Chapter 1. Purpose and Need for Action Page 5 - paragraph 3-5 are acceptable outcomes for managing riparian zone values. Woody debris in alpine and sub-alpine areas is hard to come by. Storage of woody debris in high gradient, larger streams like the WF-BF which has been shown to be fed by avalanche snow pack will also be hard to come by. As long as these factors are considered, storing all the woody debris as is possible is a great goal.	Thank you for your comment.

Letter Number	Name	Comment	Response to Comment
8c	Quentin Skinner	Chapter 1. Purpose and Need for Action - Page 7 - Watershed: I would argue that you have admitted that the WF-BF channel has been altered but are not giving your agency credit for bringing the stream back to a PFC considering that you are given the lack of a fine sediment supply, no or little transport of larger gravel and cobble across flat gradient reaches, and the continued input and movement of a small gravel component caused by headwater avalanches. I would argue that restoration is a mute point and that you are in the mode of restoring the WF-BF in a natural and best way, without high input structural treatments, and all that is needed is your current management and time and the WF-BF will become what it is to become, which is likely what it is now.	Thank you for your comment.
8d	Quentin Skinner	Chapter 1. Purpose and Need for Action Page 14 - Issues Not Relevant to the Decision to be made (stream banks). The public needs to read and understand this information, and to put it in issues not relevant to the decision of how to continue managing this landscape, is in my opinion a serious error in judgment and a poor use of forest service personnel talent.	See comment Number 3c.
8e	Quentin Skinner	Chapter 3 Affected Environment and Environmental Consequences - Page 16. Wet Meadows. Instead of saying they are usually not considered well drained, it may be best to say that they receive groundwater runoff from the surrounding watershed because they are generally located at the bottom of their individual drainage basins, and are therefore relative wet most of the frost free summer. Although compaction of the surface area of these wetter meadows could only occur with excessive hoof impact beyond anything that would ever be allowed, this compaction would be eliminated each year because of freezing and frost action. Therefore, why is the word compaction even used, when it is stated that field observations show any physical impact is minimum.	Thank you for your comment. We believe soil compaction to be a potential effect of the proposed action, and therefore appropriate for inclusion in EIS sections that address the disclosure of environmental consequences, no matter how minimal they might be.

Letter Number	Name	Comment	Response to Comment
8f	Quentin Skinner	Chapter 3 Affected Environment and Environmental Consequences - Page 21 Direct and Indirect Effects. .... and wet soils will continue to be detrimentally compacted by trampling. Kalus, T.S. 1999. Soil Compaction and Livestock in Riparian Zones, M.S. Thesis, Department of Renewable Resources, University of Wyoming, Laramie, Wyoming suggests that it requires a high and significant amount of trampling to cause compaction as measured by a change in bulk density of wet riparian zone soils. Follow up of Kalus's study showed that the effect of compaction of wet soils under heavy treatments was eliminated by a single freeze cycle of winter. My point is to just assume that wet meadow compaction will occur in the grazing alternatives is just using a wild guess, and I argue that you would never use a wet meadow complex to anywhere close to what we did in Kalus's 1999 study. Why not get rid of the compaction statement as it adds nothing to the EIS document.	Although your comment may well apply to riparian areas and wet meadows, the DEIS statement you are commenting on is associated with upland soil types. As such, we believe the statement accurately discloses the potential affects on compaction of upland soils being grazed under seasonally saturated or wet conditions.
8g	Quentin Skinner	Chapter 3 Affected Environment and Environmental Consequences, Page 39 Beaver - Riparian - It appears that there is little beaver activity and that small willow habitat will keep beaver activity at about the same level in no grazing and grazing alternatives.	We agree with your statement.
8h	Quentin Skinner	Chapter 3 Affected Environment and Environmental Consequences, Page 69 Alternative C, Direct and Indirect Effects - Detailed fishery habitat surveys and modeling efforts attempt to quantify impact caused by the grazing alternatives. Bank damage and sediment loading to spawning habitat from crossings are utilized to evaluate potential impact. It is apparent that this impact should be compared to the impact caused by debris loading caused by avalanche activity year to year. I argue that crossings for sheep and recreation have little if no effect on the spawning and pool habitat conditions of WF-BF system compared to inputs by the high elevation avalanche system and this should be covered in the fish habitat section and direct impacts to put issue in perspective.	The avalanche is discussed in section 1.8.2.3 of the DEIS. It was, as far as we can tell, a single event that carried into the channel primarily large wood. Little evidence of sediment was seen when the site was walked through in 2005. The slide is however almost 20 years old. Additional wording has been added to FEIS sections 3.2.6.1, 3.2.6.2 and 3.2.6.3 that clarifies the discussion of the avalanche.

Letter Number	Name	Comment	Response to Comment
9a	Wasatch Mountain Club	There is no value associated with uses other than grazing in high altitude pastures. The degradation of recreation enjoyment appears to have no place in the analysis.	Effects of grazing on recreation experiences are documented in the FEIS sections 3.4.2, "Wilderness and Back Country Recreation Experience and Values" and 3.4.3 "Current Situation-Effects on Recreational Experience and Values".
10a	Wayne McCormick	Each of the analyzed alternatives contemplate the possibility of further restrictions of grazing starting with the upper elevations, so the decision make could more aggressively phase out grazing. Because the DEIS does not portray a wide array of choices, it could be challenged as inadequate.	The statement of underlying purpose and need determines the range of alternatives in the EIS.
11a	Vince Desimone	Grazing has significant negative impacts on wilderness values and natural environmental processes.	Effects of grazing on wilderness is analyzed in the FEIS sections 3.4.2, "Wilderness and Back Country Recreation Experience and Values" and 3.4.3 "Current Situation-Effects on Recreational Experience and Values".
11b	Vince Desimone	It is not appropriate to allow grazing at the expense of wilderness values and natural environmental processes	Wording has been added to Section 1.8.2.2 of the FEIS to clarify the point that grazing of domestic livestock will continue in Wilderness. It is the Forest Services responsibility to mitigate the impacts. Those impacts are documented in the FEIS in section 3.4.2 "Wilderness and Back Country Recreation Experience and Values" and 3.4.3 "Current Situation-Effects on Recreational Experience and Values."
11c	Vince Desimone	Social and economic values include experience of the human visitor to wilderness and should be considered.	Social and economic resources were analyzed in section 3.5. Experience of human visitors was analyzed in the FEIS in section 3.4.2 "Wilderness and Back Country Recreation Experience and Values" and 3.4.3 "Current Situation-Effects on Recreational Experience and Values."
11d	Vince Desimone	Phase out grazing giving wilderness values and natural environmental processes high priority.	Thank you for your comment.
12e	Margaret Pettis	Where is the protection for the elusive lynx?	Protection for the lynx is covered in the "Canada Lynx Conservation Assessment and Strategy" which was incorporated into standards and guidelines of the Revised Forest Plan.

Letter Number	Name	Comment	Response to Comment
12f	Margaret Pettis	The fact that you allow Wildlife Services free reign, with little or no guidance on the forest is another poor indication of your concern for wildlife communities on the Uintas—particularly the predators.	As of May 1995, (See Forest Service Manual, Chapter 2650), the Forest Service recognizes the Animal and Plant Health Inspection Service (APHIS) - Animal Damage Control (now entitled the Wildlife Services Agency (WS)) program and State agencies as having the authority and expertise to conduct predator control on National Forest System lands, to determine livestock losses, and to determine methodology for animal damage management. APHIS is the lead agency in preparing environmental documentation for predator control and other animal damage management activities initiated by APHIS on National Forest System lands.
12g	Margaret Pettis	Curtailing then eliminating grazing here is the only way to resolve this major impact on the Uintas.	The FEIS acknowledges that grazing affects resources in the West Fork Black Fork and determined that these affects are within Forest Plan standards and guidelines.
12h	Margaret Pettis	The Forest has not issued the necessary limitations on sheep numbers over the years that could have resulted in a lighter impact on the range we all share.	FEIS Chapter 1, Section 1.8.2.3.6, Grazing Capacity/ Stocking Rates/Utilization Monitoring has been added to the FEIS. It indicates that the permitted use on the allotment was as high as 4661 sheep months in 1916. Currently 2580 sheep months use are allowed on the allotment.
13a	James W. Thompson	I think alternative A is the best choice. As a go between amidst traditional grazing uses and wilderness values, I believe alternative B is okay.	Thank you for your comment.
14a	Kirk Jensen	I support Alternative A, the No Grazing Alternative and further support the cessation of trailing of thousands of sheep thru this sensitive watershed	Thank you for your comment.
14b	Kirk Jensen	Those sheep trail to other locations where damage is also occurring, and your analysis did not include those	An analysis of the affects of trailing W fk-Blacks Fk sheep across the National Forest to the allotment has been expanded in Section 1.8.2.3.7 of the FEIS. The affects of trailing and grazing sheep on other allotments (such as Ashley National Forest Allotments) will be analyzed when the National Environmental Policy Act documents are completed for those allotments.

Letter Number	Name	Comment	Response to Comment
14c	Kirk Jensen	Your analysis also did not address the regional significance of the West Fork Black's Fork and the adjacent grazed watersheds within the Wilderness or their importance to the regionally significant wildlife corridor of which these areas are a critical part.	See response to 1.2o.
15a	Marshall Atwell	Your analysis did not include the trailing of thousands of sheep through this sensitive watershed.	See response for comment 14b.
15b	Marshall Atwell	Your analysis did not include the significance of the West Fork Black Forks and adjacent grazed watersheds within the Wilderness.	Grazing allotments that are adjacent to the West Fork Blacks Fork were not included in the analysis unless there was a connection with them based on the resource of concern. For instance, the discussion in Section 3.2.1, Terrestrial Wildlife in the FEIS includes information for areas across the North Slope of the Uinta Mountains because it the herd unit is delineated across this broad area.
15c	Marshall Atwell	Your analysis did not include the importance to the regionally significant wildlife corridor of which these areas are a critical part.	See response to 1.2o.
16a	Mike Hudak	Supports Alternative A because Alternative C continues damage to watershed and wilderness values while A corrects these over time with sheep grazing discontinued.	Thank you for your comment.
16b	Mike Hudak	Analysis did not address trailing to other locations through sensitive watersheds.	See response for comment 14b.
16c	Mike Hudak	Analysis did not address importance of West Fork Black's Fork and adjacent grazed watersheds within the Wilderness and their importance as critical part of the regionally significant wildlife corridor.	See response to 1.2o.
17a	Joan Zacharias	I support Alternative A, the No Grazing Alternative, and further support the cessation of trailing of thousands of sheep through this sensitive watershed. Those sheep trail to other locations where damage is also occurring and your analysis did not include those.	See response for comment 14b.

Letter Number	Name	Comment	Response to Comment
17b	Joan Zacharias	Your analysis also did not address the regional significance of the West Fork Black's Fork and the adjacent grazed watersheds within the Wilderness or their importance to the regionally significant wildlife corridor of which these areas are a critical part.	See response to 1.2o.
17c	Joan Zacharias	The DEIS did not provide a full and complete evaluation of the impacts of sheep grazing and trailing in the West Fork Blacks Fork.	See response for comment 5a.
18a	Bryan Brown	I strongly support alternative A in the DEIS.	Thank you for your comment.
18b	Bryan Brown	The DEIS admits that the action alternatives do not allow for Revised Forest Plan DFC wilderness and watershed values to be achieved.	Summaries of Desired future conditions (DFCs) specifically for the High Uintas Wilderness were added to Chapter 1 of the FEIS for clarification. As presented in the Wasatch-Cache National Forest Revised Plan the DFCs are conditions that we are striving for but may not necessarily meet in the planning period of the Revised Forest Plan. Although the current conditions may not be meeting the DFC for all of the wilderness or watershed values, the trend appears to be maintaining or improving conditions and not trending downward. This is shown in Section 3.1.3.2 Effects on Alpine Soils, Proposed Action, where soil disturbance is expected to meet Forest Plan Guideline G4 and in Section 3.1.4.3 Effects on Alpine Plant Communities, Proposed Action, where ground cover conditions are expected to meet or exceed Forest Plan standard of 85% of potential.
19a	FWS	We recommend the preferred alternative be modified to include the permanent closure of Unit 4a to sheep grazing	You describe Alternative B. The Responsible Official has the option of choosing this alternative as her decision.
19b	FWS	... and that sufficient monitoring be implemented (or continued to be implemented) in order to document the subsequent changes in plant community structure, riparian health, stream morphology, sheep operation success, and visitor satisfaction.	140 monitoring studies are located on the West Fk-Blacks Fk Allotment. They are designed to monitor changes in resource conditions and to monitor for compliance with the Revised Forest Plan Standards and Guidelines. Annual meetings are held with the permittee to develop grazing strategies to meet Forest Plan Standards and Guidelines, minimize impacts to visitors, and help the sheep operation

Letter Number	Name	Comment	Response to Comment
			be successful on the N.F. Wilderness visitors can leave comments at registration box.
20a	Jim Catlin - Wild Utah Project	The DEIS fails to provide key information needed for the public to provide fully informed comments on the proposed decision. The DEIS should report through text and maps those areas that meet desired conditions and those areas that fail to meet the required conditions.	Desired conditions were established in the Revised Forest Plan as a point in time in the future. It is not a requirement that every acre of the Wasatch-Cache NF currently be in desired condition; rather, our goal is to meet or be moving towards desired condition. It is required that we meet all standards established in the Forest Plan. We believe the information presented in the FEIS is adequate for informed public review.
20b	Jim Catlin	The stocking level allowed by the proposed permit (number of stock and period of use) appears to be arbitrary and unsupported by analysis. There is no range capacity analysis based on current conditions.	FEIS Chapter 1, Section 1.8.2.3.6, Grazing Capacity/ Stocking Rates/Utilization Monitoring has been added to the FEIS. This section explains how the tentative grazing capacity of the allotment was determined.
20c	Jim Catlin	The analysis is based on grazing use less than that which will be permitted. The analysis provided in the DEIS is for an alternative not described in the DEIS that is graving levels that matches actual grazing use.	2,580 sheep months have been allowed to graze on the allotment each year 1999 thru 2005 (Annual Operating Instructions 1999 thru 2005). Section 2.2.5 Alternative C, DEIS, indicates that approximately 1,075 ewes with their lambs are grazed from approximately July 6 to September 15 (emphasis added). The average actual use over those seven years is 2,526 sheep months (Actual Use Reports, 1999 thru 2005). This is 98% of the allowed sheep months. This indicates that the analysis provided in the DEIS for Alternative C closely matches actual grazing use from 1999 thru 2005.
20d	Jim Catlin	The EIS should consider an alternative that assesses range capacity consistent with the Forest Plan and the need to prevent impairment of range productivity. We ask that a multiple use alternative be analyzed that assesses the amount of grazing that can be allowed consistent with range science, legal requirements and current range conditions.	FEIS Chapter 1, Section 1.8.2.3.6, Grazing Capacity/ Stocking Rates/Utilization Monitoring has been added to the FEIS. We believe the two action alternatives are consistent with the standards and guidelines in the Forest Plan, range science, legal requirements and current range conditions.

Letter Number	Name	Comment	Response to Comment
20e	Jim Catlin	Range conditions today indicate that the range productivity is impaired. Forage productivity for this allotment should be reassessed and included in a range capacity analysis. Utilization levels would be 20% because of the degraded nature of the range. Permitted numbers would be determined by the results of the capacity analysis.	The FEIS acknowledges that grazing affects resources in the West Fork Black Fork and determined that these affects are within Forest Plan standards and guidelines. Tentative grazing capacity was determined in 1962 (see FEIS Chapter 1, Section 1.8.2.3.6) This tentative capacity has been confirmed as correct thru Unit Examination records (R42200-15), utilization studies, and about 140 monitoring studies (FEIS Appendix C; FEIS Section 5.1 Appendix A- Literature Cited).
20f	Jim Catlin	A forage allocation should be assigned to the trailing of livestock.	Summarization of utilization measurements in Appendix C indicates light to moderate utilization of key species. Ocular utilization estimates recorded on Unit Examination Records R4-2200-15, indicate light to moderate utilization of key species. Range Specialist Reports (USDA Forest Service. 2000, 2004. Unpublished report, Range Specialist Report, Richard Zobell) indicate overall light to moderate key species utilization levels. This information indicates that the allotment contains adequate forage for both the Ashley trail herd and the allotment permitted herd without exceeding Forest Plan utilization standards.
20g	Jim Catlin	There is no indication that the forage needs for wildlife were considered in the proposed alternative. The analysis should consider the forage needs for game wildlife.	Winter and summer range for big game is discussed in Section 3.2 the FEIS. The allotment is all on summer range. There are over 500,000 acres of deer and elk summer range on the North Slope hunt unit. The allotment is 16,500 acres (3% of all summer range). The herd objective for deer and elk on the unit is 5,300 and 1,600 respectively. Utilization monitoring on the North Slope of the Uintas shows that grazing is within the Forest Plan guidelines.
20h	Jim Catlin	For lands at their potential a utilization level of 15% can be supported by literature. We request that the Forest Service provide the scientific analysis that supports the utilization rates used in the DEIS.	The utilization standards are from the Revised Forest Plan. These standards were taken from the Rangeland Health FEIS, which contains scientific reasoning for the utilization standards found in the Revised Forest Plan.
20i	Jim Catlin	An alternative should be considered that would eliminate sheep trailing in the drainage.	See response for comment 14b.

Letter Number	Name	Comment	Response to Comment
20j	Jim Catlin	There is no rationale for preferring Alternative C.	Thank you for your comment.
20k	Jim Catlin	The DEIS provides no scientific evidence or field data from past practices that validates the proposed benefits from rest-rotation prescriptions. There appeared to be no reason for the designation of Units 1, 2 and 3. The DEIS did not provide any evidence that the proposed scheme of rest-rotation for the alpine benches or other units will result in any improvement.	This report indicates two years rest restores the vigor of plants. See FEIS 5.1 Appendix A - Literature Cited, Goodrich (2006-RR).
20l	Jim Catlin	The DEIS neglects to report utilization levels on the relevant species of forage plants.	FEIS Appendix C Utilization Summary summarizes utilization of key species for the lower three units for 10 different years, light to moderate use overall. It also reports green line stubble heights for five different, greenline stubble height >6". Unit Examination records R4-2200-15, 1997 thru 2003 indicate light to moderate use in lower three units. Range Specialist Report (Zobell 2004) estimates utilization of key species in the alpine to be light to moderate. Unit Examination records R4-2200-15, 1997 thru 2003 indicate primarily light use in the alpine and greenline stubble heights >6" in the alpine.
20m	Jim Catlin	Streambank and riparian impacts from sheep trailing and grazing are noted as insignificant and incorrectly dismissed as being inconsequential.	See comment Number 1.2L. Riparian effects are discussed in Section 3.1.2.4 Alpine Riparian Communities, Section 3.1.9 Riparian Plant Communities, and Section 3.1.10 Effects on Riparian Plant Communities of the DEIS.
20n	Jim Catlin	The degradation in the WFBF allotment can not be chiefly attributed to the northern pocket gopher. The extent of gopher activity is not mapped or quantified in any manner.	Effects of pocket gophers is also included in a reference in the FEIS Appendix A -Literature Cited. In the FEIS this is found in 5.1 Appendix A -Literature Cited [Goodrich (2004) pages 5-8]. Pocket gopher activity is not mapped, but it is quantified by community type Goodrich and Zobell (2006-Feb) as found in FEIS 5.1 Appendix A -Literature Cited.

Letter Number	Name	Comment	Response to Comment
20o	Jim Catlin	The DEIS does not adequately address the Forest service's requirement to restore the Canada lynx to this allotment. The DEIS should report the snowshoe hare densities in the WFBF and if they meet the density standards for lynx habitat in satisfactory conditions. The DEIS should address the cumulative impacts on lynx of livestock grazing on the WFBF and elsewhere on the Forest.	The Forest Service's requirement is to maintain habitat for viable populations of native and desired non-native wildlife species. The U.S. Fish and Wildlife Service (FWS) is responsible for Federally listed species, the determination of critical habitat, writing the recovery plan and the reintroduction of these species if it identified in the recovery plan. The Forest Service cooperates with the FWS in the implementation of the recovery plan.
20p	Jim Catlin	Predator control should not be permitted in the WFBF.	Under the Wilderness Act, activities that are present at the time a wilderness is established can continue. Methods of taking predators by Wildlife Services within wilderness are restricted to calling and shooting, traps, and dogs. They are only allowed to pursue offending animals. Please see additions to Section 3.2.1.5 of the FEIS regarding predator control.
20q	Jim Catlin	Impacts on wilderness characteristics are not adequately treated.	The FEIS contains sufficient information to provide a correct level of analysis for the decision maker. Effects of grazing on recreation experiences are analyzed in the FEIS sections 3.4.2, "Wilderness and Back Country Recreation Experience and Values" and 3.4.3 "Current Situation-Effects on Recreational Experience and Values".
20r	Jim Catlin	The economic and social values that would accompany the preferred alternative fail to put this decision in a proper perspective.	Social and economic resources were analyzed in Chapter 3, section 3.5.
20s	Jim Catlin	Beaver as a MIS are not assessed to see if their populations meet historic and potential levels or not. Goshawk needs are not assessed. The DEIS should assess how grazing impacts fish habitat needs.	Beaver are discussed in Chapter 3, sections 3.2.2.3 and 3.2.4.4. Goshawks are discussed in Chapter 3, section 3.2.2.1 and 3.2.4.4. Fish habitat needs are discussed in Chapter 3, Section 3.2.5.2.2.
21a	Marty Steitz	The DEIS should analyze grazing impacts by the actual numbers and intensity of sheep grazing, and should quantify the impacts (muddy stream crossings, denuded meadows, rutted and barren sheep trail ways) as separate from geological processes and pocket gophers.	The FEIS acknowledges that grazing affects resources in the West Fork Black Fork and determined that these affects are within Forest Plan standards and guidelines.

Letter Number	Name	Comment	Response to Comment
21b	Marty Steitz	Questions the scientific basis of concluding that sheep grazing impacts cannot be sufficiently differentiated from gophers and geologic processes.	Recent pocket gopher activity is readily distinguished by the characteristic mounds and eskers, however, once they are deflated by wind and water, they are less easily distinguished from livestock activities. The FEIS concludes that Revised Forest Plan soil quality guidelines (guideline G4) are being met under the proposed action and its alternatives, i.e. that detrimental soil disturbances due to management activities do not occur on more than 15% of an activity area.
21c	Marty Steitz	DEIS notes that all resource values would improve with the no grazing alternative so does this alternative also do away with gophers?	As cited in the EIS a clear correlation between livestock grazing and pocket gophers does not seem apparent in the Uinta Mountains. If livestock grazing were eliminated, pocket gopher activity may continue.
21d	Marty Steitz	How are impacts to wilderness values not relevant simply because grazing is allowed? Can't the Forest Service evaluate any currently allowed activities?	Effects of grazing on recreation experiences are analyzed in the DEIS sections 3.4.2, "Wilderness and Back Country Recreation Experience and Values" and 3.4.3 "Current Situation-Effects on Recreational Experience and Values". Other activities are evaluated by resource in Chapter 3.
21e	Marty Steitz	The economic analysis fails to include the broader social and economic values associated with wilderness by including only the personal financial impacts to the rancher.	The DEIS Issue 5: Economic/Social Values, was narrow in scope only to discuss the economic impacts on Uinta County, Wyoming and the permittee. Broader values including ecological and recreation are discussed in DEIS, Chapter 3.
21f	Marty Steitz	The impacts of sheep trailing and grazing are apparent ("multiple rows of sheep ruts obliterated the trail.... Streams pounded by hooves dumped a muddy roil into the river") to recreation users who have been instructed by the Forest Service to tread lightly on the trail, avoiding erosion and protecting vegetation and watersheds.	Please see the response to comment 24e2.
22a	Carl Larson	Table 2-3, comparison of alternatives - My question is, could the ground cover be at potential now?	The FEIS acknowledges that grazing affects resources in the West Fork Black Fork and determined that these affects are within Forest Plan standards and guidelines.

Letter Number	Name	Comment	Response to Comment
22b	Carl Larson	Chapter 3, page 12 – Cumulative effects - It needs to be spelled out in this document that this is natural geological erosion, which will continue on in the future. Curtailing sheep grazing will not solve this problem.	FEIS, Chapter 3, Alternative A - No Grazing, Cumulative Effects indicates that some soil disturbance and erosion will continue without sheep grazing.
22c	Carl Larson	Chapter 3, page 14 – Direct & Indirect Effects - On the first line shouldn't it read, "This alternative provides for rest of alpine plants in two consecutive out of every four years ... (instead of every three years)?"	Thank you. The FEIS has been corrected to read, "two consecutive years rest out of four".
22d	Carl Larson	Chapter 3, page 15 –Upland Soils - Current Situation – Dry Meadows - In the last sentence of the 1st paragraph, you say. "however, certain aspects of sheep grazing (trailing and bedding) are believed (my emphasis) to be adding to the amount of bare ground." Does this word believed have any scientific basis?	Ground cover data disclosed in FEIS section 1.8.3.6 appears to conflict with the statement from DEIS chapter 3 mentioned in your comment. We have chosen to eliminate this statement from the FEIS to clarify this matter.
22e	Carl Larson	If the sheep grazing was detrimental to this allotment, we feel that the many range studies that have been conducted would show this, when in fact they do not.	The FEIS acknowledges that grazing affects resources in the West Fork Black Fork and determined that these affects are within Forest Plan standards and guidelines.
24e1	EPA	Are predator control activities influencing the abundance of gophers resulting in the occurrence of bare soil?	Predator control activities are not influencing the abundance of gophers. In 2005 Wildlife Services took 19 coyotes off of the entire portion of the Uinta Mountains that is administered by the Wasatch-Cache. These 19 coyotes were taken off of 6 allotments. Effects on gophers would be negligible.
24e2	EPA	What aspects of sheep grazing (trailing and bedding) are believed to be adding to the amount of bare ground?	A 2004 field review of Study W17-1A indicates that sheep grazing activities are having a minor influence on ground cover conditions found at this site.
24a	EPA	Chapter 1 Pg. 4 -In the "Background" section of EIS, EPA recommends that any historical information relating to the numbers of sheep grazed in the West Fork Blacks Fork (WFBF) Allotment and any citations of the grazing permit be listed since the Allotment Management Plan was developed in 1965. Has there been any increase or decrease in the numbers of sheep grazing in the allotment over the previous 40 years?	FEIS Chapter 1, Section 1.8.2.3.6, Grazing Capacity /Stocking Rates/Utilization Monitoring has been added to the FEIS. It indicates that the permitted use on the allotment varied from 1959 to 1998 from as high as 3,288 sheep months to as low as 2,790 sheep months. Prior to 1959, permitted use on the allotment reached as high as 4,661 S.M.'s in 1916 and then was gradually reduced over the years to those S.M.'s permitted in 1959. Beginning in

Letter Number	Name	Comment	Response to Comment
			1999, 2,580 S.M.'s (sheep months) have been allowed on the allotment; this number includes about 107 S.M's that are not grazed on the allotment itself, but are grazed as the sheep trail across the National Forest coming to and going from the allotment.
24b	EPA	Chapter 3, Pg. 11 -Under "Effects on Alpine Soils", there is a statement that it is impossible to determine what percentage of the disturbance to natural integrity is impossible to determine what percentage of the disturbance to natural integrity is resulting from the management of grazing activities. Has a stocking rate analysis been completed for the WFBF Allotment? According to the terrain maps (i.e. Map 2-3), it appears that Units 2, 3, and 4 have terrain with slopes potentially greater than 45 degrees. Is this sloping type terrain suitable for grazing of sheep? If this terrain is not suitable for grazing, is it excluded from the estimated 42,150 acres listed in Table 3-5 for the WFBF Allotment?	FEIS Chapter 1, Section 1.8.2.3.6, Grazing Capacity/ Stocking Rates/Utilization Monitoring has been added to the FEIS. It indicates that the estimated tentative grazing capacity done in 1961 is well within the allowed use. The 1961 range analysis did not classify any slopes greater than 45 degrees as suitable for sheep grazing and those lands were not included in the estimated tentative grazing capacity (Site Analysis Forms R4-2200-13, Ocular Analysis Forms R4-2299-10, 1961 Range Analysis, West Fk-Blacks Fk Allotment). Table 3-5 in Chapter 3 was corrected in the FEIS and changed from 42,150 to 16,519.
24c	EPA	Chapter 2, Pg. 10- The DEIS states that long-term monitoring of representative key areas for ground cover and species composition will be conducted every 5 years. How often is the monitoring for the mitigation and management requirements common to the grazing alternatives accomplished?	It is desirable to annually monitor for compliance of the mitigation and management requirements common to the grazing alternatives. Yearly monitoring has to be tempered consideration of yearly budgets and total range workload.
24d	EPA	Chapter 3, Pg. 16- Studies W7-18B, W7-18C, W7-18C2, located in a dry meadow at the north end of the allotment, indicate over 50% bare soil that is attributed to current and past pocket gopher activity .The Utah Nonpoint Source Pollution Management Plan (2000) Best Management Practices states "Grazing at an intensity that will maintain enough cover to protect the soil and maintain or improve the quantity and quality of desirable vegetation." With the minimal vegetative cover in the north end of the allotment, are these areas unsuitable for grazing and does current grazing practices exacerbate the high bare soil conditions on the dry meadow?	Field monitoring of these study sites in 2004 and 2005 indicate light utilization near the end of the permitted grazing season. The permittee receives annual instructions to light pass thru this area due to the high amount of bare soil (AOI West Fk-Blacks Fk Allotment, 2005) .The evidence provided by the monitoring studies indicates pocket gophers are the primary agent of reduced ground cover, and where sheep graze in the absence of gophers ground cover has been maintained to near 100% (see FEIS Section 5.1 Appendix A- Literature Cited Goodrich and Zobell 2006-Feb.).

Letter Number	Name	Comment	Response to Comment
24e	EPA	Chapter 3, Pg. 17- The document states that study W17-1A is also located in a dry meadow near the wilderness boundary and also shows a high amount of bare soil; again, nearly all of the bare soil conditions at this site can be attributed to current and past gopher activity. Is the occurrence of gophers greater on grazed land vs. ungrazed land? What aspects of sheep grazing (trailing and bedding) are believed to be adding to the amount of bare ground?	The evidence provided by the monitoring studies indicates pocket gophers are the primary agent of reduced ground cover, and where sheep graze in the absence of gophers, ground cover has been maintained to near 100% (see FEIS Section 5.1 Appendix A- Literature Cited Goodrich and Zobell 2006-Feb.) With the requirement of " no bed grounds will be used more than one night", (DEIS Chapter 3, Page 20) ground cover at those sites is should be maintained. Affects on ground cover from trailing is also discussed in the DEIS Chapter 3, Page 20.
24f	EPA	Chapter 3, Pg. 3- Qualitative soil condition assessments conducted in 2003 within the alpine areas of this Allotment found that approximately 50 percent of the sites were either at risk or impaired. Does this assessment indicate that the alpine areas of the Allotment are unsuitable for sheep grazing?	No. In Section 3.1.1, the DEIS concluded only that soil disturbance was observed in amounts that exceed Revised Forest Plan Guidelines at locations rated "impaired", that this occurred at 17% of the locations assessed, and that this disturbance could be due to either natural or grazing conditions, or both. Text will be added to the FEIS to clarify this.
24f1	EPA	Is the projected 1075 ewes and their lambs an appropriate number for grazing the alpine areas of the Allotment?	Unit Examination records R4-2200-15, 1997 thru 2003 indicate primarily light use in the alpine and greenline stubble heights >6" in the alpine.
24g	EPA	For this project, the stocking rate analysis for the WFBF Allotment is unavailable.	FEIS Chapter 1, Section 1.8.2.3.6, Grazing Capacity/ Stocking Rates/Utilization Monitoring has been added to the FEIS.
25a	David Jorgensen	Bias is displayed in the economic sections of the DEIS. Chapter 3 has the admission that to discontinue grazing on Unit 4 would not put the rancher out of business, yet it is almost hidden and somewhat qualified in following text.	Social and economic resources were analyzed in Chapter 3, Section 3.5.
25b	David Jorgensen	Once the natural factors are accounted for grazing in the WFBF does not degrade conditions below WCNF standards. One obvious question is: Are the standards appropriate?	Wasatch-Cache NF standards were developed and analyzed in the Forest Plan Revision process.

Letter Number	Name	Comment	Response to Comment
25c	David Jorgensen	If 85% of ground cover is met, can sheep grazing continue without significant ecological problems? The DEIS assumes yes by classifying the area as "suitable" in the Forest Plan. Yet the Forest Plan was not designed to make site-specific conclusions.	We have completed an allotment specific capability analysis. It has been incorporated into EIS and is presented in section 1.8.2.2.
25d	David Jorgensen	Is the 85% of potential ground cover is it applied to each community type or the overall amount of vegetation in an area? If it is an overall figure is it a good standard for alpine areas?	The 85% of potential is applied by community type.
25e	David Jorgensen	Gophers and adverse snowmelt conditions seem to make an already sensitive alpine area less suitable for grazing even if the 85% of potential vegetation can be achieved.	The evidence provided by the monitoring studies indicates pocket gophers are the primary agent of reduced ground cover, and where sheep graze in the absence of gophers, ground cover has been maintained to near 100% (see FEIS Section 5.1 Appendix A- Literature Cited Goodrich and Zobell 2006-Feb.).
26a	Sharon Emerson	The prepared document does not study scientifically the wide scale effects of sheep grazing in fragile alpine ecosystems. To decide that documented natural disturbances made it impossible/unnecessary to evaluate grazing effects is a lapse of logic.	The following reference addresses sheep grazing in alpine ecosystems across the Uinta Mountains (see FEIS Section 5.1 Appendix A- Literature Cited Goodrich, Huber, Zobell 2005).