

Organization Name/Commenter Name	Comment Text	Response Text
Utah Native Plant Society, Tony Frates	With respect to the species at risk assessment dated August 2016, we do not see any reference to consideration of this reference: Alexander J. 2016. The Utah Native Plant Society rare plant list: version 2. Calochortiana (3):3-247. Available at http://www.unps.org/Calochortiana/CalochortianaMay2016Num3.pdf	Best available science was used to evaluate plant species considered for Species of Conservation Concern status. NatureServe database was consulted in these assessments; however, other data sets included hundreds of herbarium specimens housed in Utah, Wyoming, and Colorado herbaria; plant status reports by credible authors such as Franklin, Goodrich, Heidel, and Fertig; numerous floras including Flora of North America, A Utah Flora, Intermountain Flora, Uinta Flora, and Flora of Wyoming; NRCS Plants database; Integrated Taxonomic Information System database; Utah, Wyoming, and Colorado Heritage plants databases; and the numerous studies and plant surveys conducted on the Ashley National Forest over the last 40 years. Using this information, each plant was carefully evaluated for occurrence, distribution, persistence, and known stressors and drivers.
Utah Native Plant Society, Tony Frates	See specifically pages 5 and 7 through 10. We do not believe that the impacts by introduced mountain goats are being fully taken into account.	Since 1980s, numerous long-term studies have been established within the alpine areas across the Uinta Mountains, adding to the many studies that existed prior to that time. Over a thousand studies are found in and at the head of every major drainage on the south slope of the Uinta Mountains from Marsh Peak to Granddaddy Lake Basin and many if not most are located within existing or potential mountain goat habitat. Repeat photography is the most common sampling method used to determine trend, but other sampling methods used to monitor total ground cover and plant species composition include ocular macroplot, line point intercept, and point ground cover. Data from these studies show ground cover meeting or surpassing desired condition with trends typically stable. Low willows in alpine settings continue to show no change or increase in canopy cover, which indicates desired condition. Plant species composition in a variety of vegetation communities remains unchanged, including communities where rare plants are found. Studies monitoring rare plants such as <i>Draba globosa</i> and <i>Papaver coloradense</i> indicate stable populations. At this time, monitoring does not show downward trend in ground cover, plant species composition, or shrub canopy cover in areas where mountain goats are present. The Ashley National Forest believes that there are adequate number and distribution of studies in alpine to track future mountain goat impacts, but more monitoring sites are expected to be established in the years to come. Current studies are located in areas where mountain goats are currently not found or rarely frequent, in areas where goats are commonly found and populations continue to show increase, and in areas that are near or adjacent to existing goat populations, but receive limited use. We believe that we are prepared to track future and possible expanding impacts of mountain goats. In conclusion, long-term monitoring has not detected downward trend in vegetation community composition, plant species populations, or ground cover associated with current mountain goat impacts in the Uinta Mountains. In response to the comment that <i>Eriogon goodrichii</i> , <i>Townsendia goodrichii</i> , and <i>Draba inexpectata</i> were not included in the risk assessment; these plants were not included on the initial list of 82 plants to be assessed because they either didn't meet the initial assessment criteria (<i>Eriogon goodrichii</i> is a G3/S3 plant not a G2/S2), or the taxon is not recognized by most floras and their authors such as Flora of North America, Intermountain Flora, etc. (<i>Townsendia goodrichii</i>), or the plant is not known within the project area (<i>Draba inexpectata</i>). Furthermore, taxa <i>Eriogon goodrichii</i> and <i>Townsendia goodrichii</i> have been closely analyzed by the authors of Uinta Flora based upon collected specimens. <i>Eriogon goodrichii</i> diagnostic features intergrade with those of <i>Eriogon caespitosus</i> and the morphological characteristics of <i>Townsendia goodrichii</i> are not sufficient to separate it from <i>Townsendia montana</i> var. <i>montana</i> as noted in the Uinta Flora.
Utah Native Plant Society, Tony Frates	NatureServe ranks for many species are very much out of date and absolutely cannot be solely relied alone for this assessment.	Best available science was used to evaluate plant species considered for Species of Conservation Concern status. NatureServe database was consulted in these assessments; however, other data sets included hundreds of herbarium specimens housed in Utah, Wyoming, and Colorado herbaria; plant status reports by credible authors such as Franklin, Goodrich, Heidel, and Fertig; numerous floras including Flora of North America, A Utah Flora, Intermountain Flora, Uinta Flora, and Flora of Wyoming; NRCS Plants database; Integrated Taxonomic Information System database; Utah, Wyoming, and Colorado Heritage plants databases; and the numerous studies and plant surveys conducted on the Ashley National Forest over the last 40 years. Using this information, each plant was carefully evaluated for occurrence, distribution, persistence, and known stressors and drivers.
Utah Native Plant Society, Tony Frates	Note the comments on page 5 of the Alexander (2016) reference with respect to the Uinta Mountains: "In all there are a total of 79 species that could be detrimentally impacted by naturalized mountain goats." "There are 4 species that should be high priority for monitoring: <i>Eriogon goodrichii</i> , <i>Townsendia goodrichii</i> , <i>Draba inexpectata</i> , and <i>Cypripedium calceolus</i> var. <i>parviflorum</i> . This mountain range has a higher number of alpine endemic (both local and regional) than all other alpine areas in Utah. The Uinta Mountains should have been a higher priority for rare plant monitoring as a result of the range-wide goat introduction." In reviewing your species at risk assessment, we see no reference to species we have ranked as "high priority" including <i>Eriogon goodrichii</i> *, <i>Townsendia goodrichii</i> * and <i>Draba inexpectata</i> [..] "We note that Goodrich and Huber in the 2014 "Uinta Flora" do not separately recognize <i>E. goodrichii</i> nor <i>T. goodrichii</i> yet Welsh et al in "A Utah Flora" (2015 5th Ed.) maintains <i>E. goodrichii</i> as a distinct species and treats it as a Uinta-Northern Uplands endemic, and Welsh et al also treat <i>Townsendia goodrichii</i> as a Uinta Mtns endemic. Yet, Goodrich is a co-author of the 2015 edition of "A Utah Flora." We therefore do not think that these two entities, regardless of closely allied relationships to more widely distributed species, can simply be discarded for management purposes and until more research and study is conducted."	Since 1980s, numerous long-term studies have been established within the alpine areas across the Uinta Mountains, adding to the many studies that existed prior to that time. Over a thousand studies are found in and at the head of every major drainage on the south slope of the Uinta Mountains from Marsh Peak to Granddaddy Lake Basin and many if not most are located within existing or potential mountain goat habitat. Repeat photography is the most common sampling method used to determine trend, but other sampling methods used to monitor total ground cover and plant species composition include ocular macroplot, line point intercept, and point ground cover. Data from these studies show ground cover meeting or surpassing desired condition with trends typically stable. Low willows in alpine settings continue to show no change or increase in canopy cover, which indicates desired condition. Plant species composition in a variety of vegetation communities remains unchanged, including communities where rare plants are found. Studies monitoring rare plants such as <i>Draba globosa</i> and <i>Papaver coloradense</i> indicate stable populations. At this time, monitoring does not show downward trend in ground cover, plant species composition, or shrub canopy cover in areas where mountain goats are present. The Ashley National Forest believes that there are adequate number and distribution of studies in alpine to track future mountain goat impacts, but more monitoring sites are expected to be established in the years to come. Current studies are located in areas where mountain goats are currently not found or rarely frequent, in areas where goats are commonly found and populations continue to show increase, and in areas that are near or adjacent to existing goat populations, but receive limited use. We believe that we are prepared to track future and possible expanding impacts of mountain goats. In conclusion, long-term monitoring has not detected downward trend in vegetation community composition, plant species populations, or ground cover associated with current mountain goat impacts in the Uinta Mountains. In response to the comment that <i>Eriogon goodrichii</i> , <i>Townsendia goodrichii</i> , and <i>Draba inexpectata</i> were not included in the risk assessment; these plants were not included on the initial list of 82 plants to be assessed because they either didn't meet the initial assessment criteria (<i>Eriogon goodrichii</i> is a G3/S3 plant not a G2/S2), or the taxon is not recognized by most floras and their authors such as Flora of North America, Intermountain Flora, etc. (<i>Townsendia goodrichii</i>), or the plant is not known within the project area (<i>Draba inexpectata</i>). Furthermore, taxa <i>Eriogon goodrichii</i> and <i>Townsendia goodrichii</i> have been closely analyzed by the authors of Uinta Flora based upon collected specimens. <i>Eriogon goodrichii</i> diagnostic features intergrade with those of <i>Eriogon caespitosus</i> and the morphological characteristics of <i>Townsendia goodrichii</i> are not sufficient to separate it from <i>Townsendia montana</i> var. <i>montana</i> as noted in the Uinta Flora.
Utah Native Plant Society, Tony Frates	cushion plant communities require separate, special management attention. Examples of the importance of managing high elevation cushion plant communities: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3360034/ http://www.bioone.org/doi/abs/10.1657/1523-0430%282006%2938%5B24%3ACPAMSF%5D2.0.CO%3B2 So, the Ashley NF should be managing these cushion plant communities as areas of special management attention and goat impacts should be minimized if not avoided entirely to these communities.	Cushion plant communities are relatively common in the alpine areas of the Uinta Mountains, especially in wind-swept areas where snow duration is low. <i>Paronychia pulvinata</i> and <i>Silene acaulis</i> are two common plant associates of this community. Numerous long-term studies are established within cushion plant communities across the Uinta Mountains. Data from these studies indicate satisfactory conditions in terms of ground cover and plant species composition concurrent with domestic and wild ungulate use and other identified stressors. Trends are stable. Under these circumstances, no special management attention is warranted.
Duchesne County, Mike Hyde	Page 10 Line 15-17 "Climate change could also have negative effects on air quality, as it affects the potential for more frequent large and severe wildfires." Page 13, Line 11-13 "Another impact on soil resources that may continue or increase is the stress to soils related to climate variability, which affects vegetation, ground cover, fuel loads and the risk of severe wildfires." Page 22 Last line of Terrestrial Vegetation Communities "Climate change effects may also result in more frequent and larger wildfires." Page 29 Line 5-6 "Longer duration, large and more severe wildfires could become more common if climate trends continue to favor warmer and drier conditions." Duchesne County believes that the potential for more frequent large and severe wildfires is affected also by lack of funding to do forest thinning and other veg management to reduce fuels. Also, lawsuits by NGOs often prevent active forest management efforts that result in forests being more dense and crowded with more frequent large and severe wildfires. The plan revision should address these two factors in addition to climate change.	As addressed in the assessment, there are many factors such as climate (drought), vegetative conditions that contribute to the available burnable fuel and the number and cause of fires. The assessment does not address the specific economics associated with the potential tools used to treat vegetation, but it does identify where and why vegetation conditions have the potential for risk for current and future wildfires. With regard to travel management: As stated in the infrastructure section, the published motorized travel plan from 2009 and travel analysis report from 2015 will be incorporated into the revised forest plan and will not be redressed in the revision process. Based on the 2012 planning rule, assessments are intended to provide clear information for what needs to change in the forest plan. It does not cover the objection process or litigation associated with individual lawsuits from the other projects and activities that implement land management plans requiring an environmental analysis or environmental impact statement.
Duchesne County, Mike Hyde	Page 15 Line 4th line of Riparian Section "Riparian and wetland plants stabilize streambanks banks, shade water	"Streambanks banks" typo is noted and corrected from line four of the Riparian Areas and Wetlands section (page 21 of the draft assessment report). The term stressors will remain in the passage on fens in the Draft Assessment as the term is inherent to current Forest Handbook guidance. The term "avalanches" will remain, as avalanches are a potential source of disturbance to fens in steep-walled glacial canyons of the Forest. Current Forest Service Handbook direction for the content and structure of assessments in Forest Plan revision requires consideration of "drivers" and "stressors" when analyzing the status of ecosystems and their trend (FSH 1909.12.10 Land Management Handbook, Chapter 10-Assessments, section 12.1). Forest Service Handbook guidelines follow planning requirements set in 36 CFR 219.6 for the content of assessments. In section 36 CFR 219.6(b)(3) of this federal code, assessments shall consider system drivers, including dominant ecological processes, disturbance regimes, and system stressors, such as natural succession, wildland fire, invasive species, and climate change, and the ability of terrestrial and aquatic ecosystems in the plan area to adapt to change. In section 12.14.c.2 of this Forest Service Handbook, when determining the existing condition of riparian and aquatic ecosystems, Interdisciplinary Teams may consider describing stressors such as changes in flow regime and dewatering, channelization, invasive species, changes in sediment delivery to channels, herbivory, wildfire and fuel buildup, changes to water quality due to pollutants and sediment buildup.
Duchesne County, Mike Hyde	Page 17-18 Line Areas of Concern Duchesne County believes that the list of specific concerns related to aquatic and riparian ecosystems should include the lack of funding to do forest thinning and other veg management to reduce fuels. Also, lawsuits by NGOs often prevent active forest management efforts that result in more frequent large and severe wildfires which will negatively impact such ecosystems.	As addressed in the assessment, there are many factors such as climate (drought), vegetative conditions that contribute to the available burnable fuel and the number and cause of fires. The assessment does not address the specific economics associated with the potential tools used to treat vegetation, but it does identify where and why vegetation conditions have the potential for risk for current and future wildfires. With regard to travel management: As stated in the infrastructure section, the published motorized travel plan from 2009 and travel analysis report from 2015 will be incorporated into the revised forest plan and will not be redressed in the revision process. Based on the 2012 planning rule, assessments are intended to provide clear information for what needs to change in the forest plan. It does not cover the objection process or litigation associated with individual lawsuits from the other projects and activities that implement land management plans requiring an environmental analysis or environmental impact statement.
Duchesne County, Mike Hyde	Page 20 Line 17-18 Science mentioned in the Duchesne County Resource Management Plan indicates that water yields may indeed be increased through effective vegetation management. Recent studies in California found that their drought could have been lessened by more active management of the forest (decreasing the density of vegetation that absorbs water).	The current Forest Service Manual (FSM) states that timber harvest plans can be considered to increase water yields, but that such practices should only be implemented if "cost-effective, environmentally and scientifically feasible, and consistent with other resource uses and values." (U.S. Forest Service 2004 - FSM 2522.12). The Intermountain Region (Region 4) has further defined policy related to water yield management in a letter to all Forest Supervisors (U.S. Forest Service 2002), which is summarized in the following paragraph: "The number one driver that affects water yield is precipitation. As human population continues to grow, particularly in the arid Intermountain Region, we expect to see increased pressures placed on the demand for water. That demand will continue to come from both consumptive (fishing, drinking water, etc) and non-consumptive (irrigation, rafting, etc) sources. Our ability to appreciably change the amount and timing of water is limited by many constraints, and the practical physical reality is, we are not able to make significant changes on a large scale. Consequently, the most effective management of National Forest System Lands will emphasize "optimal" water yield rather than "maximum" water yield. Optimum water yield implies healthy vegetative and aquatic ecosystems, which supply clean water for all beneficial uses of that water, both consumptive and non-consumptive. In Forest Planning, designating certain geographical areas for production of water yield has proved ineffective in other Forest Service regions over the last couple decades, and there is no reason to believe a similar approach in the Intermountain Region would be fruitful." The Air, Soil and Watershed Resources technical report to the Draft Assessment cites Muir 2008, a literature review of past and current knowledge on vegetation management and water yield. This document as well as Troendle, 2001 (also cited in the Air Soil and Watershed Resources technical report) studied whether water yield augmentation technology developed through research on small-scale experimental watersheds could be applied at an operational level on large national forest watersheds in the Intermountain West snow zone with similar results. The studies indicate vegetation management (by fuels treatments, timber harvest, habitat improvement, aspen regeneration etc.) could temporarily increase water yields on a small scale, but the changes would be difficult or impossible to detect at the watershed scale. Large scale vegetative manipulation would be further limited due to constraints imposed by other aspects of land management and such as: visual quality, aquatic habitat, riparian area and old-growth management. Results of the water yield study being conducted by University of California - Merced researchers have yet to be published. Articles dating to 2015 regarding the project, discuss research underway. This topic will also be covered in further stages of Forest Plan Revision.
Duchesne County, Mike Hyde	Page 24, Line 2nd paragraph of Conifer Forests "Without fire, some forests become dense and crowded, and can become more susceptible to large-scale insect and disease outbreaks." Page 25, Line 6-7 "Fire suppression and fire exclusion has also allowed forest fuels to accumulate in unmanaged forests." Duchesne County believes that the potential for large scale insect and disease outbreaks and severe wildfires is affected also by lack of funding to do sufficient forest thinning and other veg management to reduce stand density. Also, lawsuits by NGOs often prevent active forest management efforts that result in forests being more dense and crowded with more susceptibility to severe wildfire, insects and disease. The plan revision should address these two factors in addition to the effects of fire suppression and exclusion.	As addressed in the assessment, there are many factors such as climate (drought), vegetative conditions that contribute to the available burnable fuel and the number and cause of fires. The assessment does not address the specific economics associated with the potential tools used to treat vegetation, but it does identify where and why vegetation conditions have the potential for risk for current and future wildfires. With regard to travel management: As stated in the infrastructure section, the published motorized travel plan from 2009 and travel analysis report from 2015 will be incorporated into the revised forest plan and will not be redressed in the revision process. Based on the 2012 planning rule, assessments are intended to provide clear information for what needs to change in the forest plan. It does not cover the objection process or litigation associated with individual lawsuits from the other projects and activities that implement land management plans requiring an environmental analysis or environmental impact statement.
Duchesne County, Mike Hyde	Page 26 Line 4th Paragraph, Pinon-Juniper Forests Should there be some mention here of efforts to remove PI to benefit sage grouse habitat? (There is some mention of this later, on page 39)	A sentence was added to the sagebrush discussion in the Vegetation Section of the Assessment to acknowledge that prescribed fire and log-and-scatter treatments have been implemented to curtail conifer encroachment. Since conifer encroachment occurs in sagebrush communities, it was added to the sagebrush discussion instead of the Pinon/Juniper discussion.
Duchesne County, Mike Hyde	Page 29 Line 2nd bullet "Fire suppression has decreased the influence of fire to maintain structural heterogeneity in coniferous forests."	The discussion sentence should read: Fire suppression has decreased the influence of fire to maintain structural heterogeneity in coniferous forests.
Duchesne County, Mike Hyde	Page 29 Line 4th bullet These same regulations and philosophies have made it difficult to actively manage the forest and reduce fuel loads. This is as much to blame for the problems listed in the 5th bullet point as climate change.	As addressed in the assessment, there are many factors such as climate (drought), vegetative conditions that contribute to the available burnable fuel and the number and cause of fires. The assessment does not address the specific economics associated with the potential tools used to treat vegetation, but it does identify where and why vegetation conditions have the potential for risk for current and future wildfires. With regard to travel management: As stated in the infrastructure section, the published motorized travel plan from 2009 and travel analysis report from 2015 will be incorporated into the revised forest plan and will not be redressed in the revision process. Based on the 2012 planning rule, assessments are intended to provide clear information for what needs to change in the forest plan. It does not cover the objection process or litigation associated with individual lawsuits from the other projects and activities that implement land management plans requiring an environmental analysis or environmental impact statement.
Duchesne County, Mike Hyde	Page 45 Line The Condition of Cultural and Historic Resources (1st line) The word "is" is in red type and the track changes mark remains in the right margin	Spelling and formatting issues in the cultural resources section of the assessment were corrected.
Duchesne County, Mike Hyde	Page 30 Line Top of page The list of plants includes "stemless beardtongue" but the photo below calls it "stemless penstemon."	Thank you for your input. These edits will be made prior to the final assessment.
Duchesne County, Mike Hyde	Page 29 Line 3rd line up from bottom The word "rational" should be replaced by "rationale"	Spelling and formatting issues in the cultural resources section of the assessment were corrected.
Duchesne County, Mike Hyde	Page 46 Line 1st bullet, Line 2 Replace the word "culture" with "cultural"	Page 57 of the Draft Assessment Report provides a list of the Scenic Byways and Backways that are contained within the study area. However, the text should be reworded to clarify what the list represents. The text should be reworded to note that the list provided represents Byways and Backways that are contained within or partially within the study area. In addition, clarification is necessary to explain that Scenic Byways are not only federally designated routes, but also state and agency designated routes. The wording on the draft is not entirely correct. There are also two separate byways named Flaming Gorge. One is the Utah portion which is Flaming Gorge - Uintas National Scenic Byway, then the Wyoming portion of Hwy 191 and WY530 that is the Flaming Gorge Scenic Byway (a Wyoming state scenic byway). Hence, the list should be revised to show: Flaming Gorge - Uintas National Scenic Byway Flaming Gorge Scenic Byway Dinosaur Diamond National Scenic Byway Indian Canyon Scenic Byway Sheep Creek - Spirit Lake Scenic Backway Red Cloud - Dry Fork Loop Scenic Backway Reservation Ridge Scenic Backway
Duchesne County, Mike Hyde	Page 73 Line Wood Products "Wood products are also important for some local individuals and communities as a source of fuel wood." This sentence seems redundant given the previous sentence.	This sentence is redundant and should probably be removed.
Duchesne County, Mike Hyde	Page 79 Line Rangeland Conditions and Trends The last line of this section refers to "maps on the following pages." These maps are not included in this summary document.	The missing maps were not included in the Draft Assessment Report. The reference to the maps was an error and will be removed. The maps can be found in the Socioeconomic Technical Report under the Range Resources section. In the statement on page 76, "In 1905, Forest Supervisor William Anderson established some of the first grazing allotments on the land of the Ashley National Forest to begin managing grazing in the national forest, but more sustainably" the phrase, "but more sustainably" will be removed because this point is described in first sentence of the paragraph. On page 71 under "Provisioning Services" and agriculture" was added to the second sentence in the paragraph. On page 42 the sentence, "Overgrazing of lands across the West at the turn of the 20th century was the catalyst for the Forest Service to begin regulating grazing on the national forests" was added after the sentence "By the early 1900s, forest rangers became concerned about overgrazing, especially as they noted degradation of the range and damaged watersheds."
Duchesne County, Mike Hyde	Page 83-84 Line Timber Conclusions and Future Considerations Duchesne County believes that one of the future concerns related to the timber resource is the likelihood of significant timber sales being tied up in NGO lawsuits (which are well-documented across the country). These NGOs promote a hands-off approach to forest management, which results in dense, overcrowded forests ripe for insect and disease outbreak and severe wildfire.	Non-governmental organization as well as individuals have the ability to bring litigation against the Forest Service to force suspensions or modifications to timber sales or other Forest Service actions. The Ashley National Forest has not been litigated on a timber sale project since approximately 2006. Predicting potential litigations is almost impossible.
Duchesne County, Mike Hyde	Page 96 Line Road Maintenance, Lines 3-4 "The majority of maintenance is performed using Congressional appropriations and county road agreements." This sentence seems redundant given the previous sentence.	The text on page 96 Draft Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest accurately portrays the funding sources for the road maintenance program on the Ashley National Forest.
Duchesne County, Mike Hyde	Page 106 Line Figure 12 Indian Reservation land near the south unit appears to be inaccurate and inconsistent with Indian lands shown in Figure 11 (page 102)	Figure 12 map does display an incorrect Indian land boundary due to the outdated base map that was used. Figure 12 is basically a visual display of the existing road system. Figure 12 will be removed from the assessment.
Sweetwater County Board of County Commissioners, Wally Johnson	Potential transbasin diversions, from the Flaming Gorge Reservoir to the front range of Colorado, may impact reservoir levels and water supplies available to Lake Meade and Powell especially during drought years.	Incidence/discussion of existing transbasin diversions on the Ashley National Forest and their effects appears in the Air, Soil and Watershed Resources technical report. General discussion of projected future demands on water supply is also included in the Draft Assessment report and also appears in the Aquatic Ecosystems technical report. The operation of the Flaming Gorge Reservoir and the allotting of water rights associated with it are outside the jurisdiction of the Forest Service. Mention of specific diversion proposals from the Flaming Gorge Reservoir was not made as they remain uncertain/conjectural.
Sweetwater County Board of County Commissioners, Wally Johnson	Maintaining sufficient water supplies in Flaming Gorge Reservoir necessary to buffer the water supply needs of Flaming Gorge biological communities, recreational demands and downstream water commitments.	Incidence/discussion of existing transbasin diversions on the Ashley National Forest and their effects appears in the Air, Soil and Watershed Resources technical report. General discussion of projected future demands on water supply is also included in the Draft Assessment report and also appears in the Aquatic Ecosystems technical report. The operation of the Flaming Gorge Reservoir and the allotting of water rights associated with it are outside the jurisdiction of the Forest Service. Mention of specific diversion proposals from the Flaming Gorge Reservoir was not made as they remain uncertain/conjectural.
Sweetwater County Board of County Commissioners, Wally Johnson	Consideration of tributary salinity contributions to the Flaming Gorge and the Green River System and the need for salinity control projects on tributaries such as the Henry's Fork.	Incidence/discussion of existing transbasin diversions on the Ashley National Forest and their effects appears in the Air, Soil and Watershed Resources technical report. General discussion of projected future demands on water supply is also included in the Draft Assessment report and also appears in the Aquatic Ecosystems technical report. The operation of the Flaming Gorge Reservoir and the allotting of water rights associated with it are outside the jurisdiction of the Forest Service. Mention of specific diversion proposals from the Flaming Gorge Reservoir was not made as they remain uncertain/conjectural.
Sweetwater County Board of County Commissioners, Wally Johnson	On page 33, within the list of management concerns related to wildlife habitat on the Ashley, add the following concern: Coordination between the State of Wyoming and the Wyoming Game and Fish Department is vitally important to ensure the welfare of Wyoming wildlife and its habitat.	USFS agrees and to date have had some coordination already with Wyoming Game and Fish (WGF) and will have continued coordination with WGF department.
Sweetwater County Board of County Commissioners, Wally Johnson	On pages 35, 36, 37, 38, list those species, within the Wyoming portion of the Flaming Gorge National Recreation Area, that occur on the list of Wyoming Species of Greatest Conservation Need. This will help ensure that species that are considered sensitive to Wyoming will have habitat protections considered within the Ashley National Forest Plan Update.	The Wyoming Game and Fish Department sent a letter requesting we consider certain species. These species were evaluated during the SOCC evaluation process. The 2012 Planning Rule 36 CFR 219.9 and FSH 1909.12.52 does not require that FS sensitive species under the old planning rule be selected as species of conservation concern (SOCC). However, all R4 Forest Service sensitive species that were designated by the Regional Forester under the old planning rule that occur on the Ashley NF were considered and evaluated for potential SOCC. Four of the six species on the potential list of SOCC were sensitive species under the old planning rule.
Sweetwater County Board of County Commissioners, Wally Johnson	The Midget Faded Rattlesnake is a Tier 1 Wyoming Species of Greatest Conservation Need. This species should be listed and addressed in the Assessment Report (See pages 35, 36, 37, 38).	The midget faded rattlesnake was considered and evaluated. Upon evaluation it was found that this species did not meet the criteria for SOCC, thus it is not on the list for potential SOCC for the Ashley NF. However, this comment will be considered in development of the final list of SOCC.
Sweetwater County Board of County Commissioners, Wally Johnson	On page 37, within the Mule Deer section of the Assessment Report, provide a statement that addresses the fact that mule deer within and adjacent to the Flaming Gorge National Recreation Area are declining. Contact the Wyoming Game and Fish Department for details.	The assessment discusses wildlife such as mule deer at the Forest scale (planning unit scale), which includes the mule deer management unit that overlaps the Flaming Gorge NRA. In addition to the NRA, mule deer also occur within five other management units that overlap the Ashley NF. The population trend for mule deer were evaluated within all these units that overlap the Ashley NF, including the unit that overlaps the Flaming Gorge NRA, and there appears to be an upward trend in most of these units.
Sweetwater County Board of County Commissioners, Wally Johnson	On page 38, under the heading of "Rocky Mountain Big Horn Sheep", incorporate a statement that addresses compliance with Wyoming policies regarding the interaction of bighorn and domestic sheep within the Wyoming portion of Flaming Gorge National Recreation Area.	This is the assessment phase of Forest Plan Revision. Specific components, if needed, relating to management of bighorn sheep would be addressed in the next phase of the Forest Plan Revision process. A sentence was added to the assessment to acknowledge that bighorn sheep from the Uintas may travel into Wyoming. Because of regional concerns, and populations declines on the planning unit, bighorn sheep were reconsidered and included as a potential species of conservation concern for the Ashley Nation Forest.
Sweetwater County Board of County Commissioners, Wally Johnson	The existing Ashley National Forest Plan has classified the national forest lands within the Flaming Gorge National Recreation Area (NRA) as unavailable for oil and gas development. Because the importance of the Flaming Gorge to big game and other wildlife, Sweetwater County request that the public lands within the NRA remain unavailable to oil and gas development.	The Flaming Gorge National Recreation Area is not currently available for new federal oil and gas or oil shale leasing. We do not expect that status to change in the near future, or to occur without preparation of a formal oil and gas or oil shale leasing analysis beforehand.
Sweetwater County Board of County Commissioners, Wally Johnson	On page 54, under the heading of "Flaming Gorge National Recreation Area", provide additional statistics and information necessary to strengthen this section in regards to the importance of the NRA as a world class fishery and economic driver for southwestern Wyoming and northeastern Utah.	The Recreation Opportunities, Designated Areas, Settings, and Access technical report, Sustainable Recreation - Economic Considerations and Conditions section includes information regarding the importance of the Flaming Gorge National Recreation Area as a recreation and economic driver.
Sweetwater County Board of County Commissioners, Wally Johnson	* On page 58, in regards to the section entitled "Trends at Developed Sites", the county understands that maintenance on many facilities have been deferred due to a shortage of funds. However, the county has problems with the statement that: "Across the Ashley, some campground water systems have been temporarily or permanently closed because of deteriorating infrastructure and inability to bring the water facilities up to water quality standards." Sweetwater County can accept deferring facility maintenance until funds are available, but we do not agree with permanently closing any facilities. Campgrounds, especially those with potable water, are important recreation assets that help support our economy and provide important recreational opportunities for our residents.	Campground infrastructure deferred maintenance, lack of funding, and increased demand is discussed in the Recreation Current Activity, Trends, and Conditions, Developed Recreation and Sustainable Recreation sections of the Recreation Technical Report. Current and past actions to keep campgrounds open and usable with declining budgets are also discussed in the Sustainable Recreation section of the Recreation Technical Report.
Sweetwater County Board of County Commissioners, Wally Johnson	On page 60, in regards to both motorized and non-motorized dispersed recreation, since both of these recreation types rely on roads, trails and two tracks that cross adjacent public and private lands, it is important that the report make a reference to the necessity of coordinating roadway maintenance and access with both private and public land owners.	The Infrastructure Technical Report references coordination between the Ashley National Forest and counties for road maintenance. The Ashley National Forest works with private land owners that are adjacent to the forest boundary on a case by case basis as the need arises.
Sweetwater County Board of County Commissioners, Wally Johnson	On page 60 and 61, concerning mountain biking, Sweetwater County would like to emphasize that there are established mountain bike trails within and adjacent to the upper end of Flaming Gorge National Recreation Area. Public use and awareness of these trails is growing.	The Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest, Recreation Opportunities, Designated Areas, Settings, and Access chapter discusses the growth of mountain biking on the Ashley National Forest and the popular locations on the Ashley including the Wilkins Peak area, south of Green River, Wyoming in the dispersed recreation trends section.
Sweetwater County Board of County Commissioners, Wally Johnson	On page 63, within the Conclusions and Future Considerations section, add a bullet point that states: "competition, for use of available land, is increasing between motorized, non-motorized and bicycle recreational users." This statement recognizes that there is increasing competition for limited available land base.	The Recreation Technical Report discusses changing recreation uses and user competition in the Recreation Current Activities, Trends, and Conditions. The statement "competition for use of available land is increasing between motorized, non-motorized, and bicycle recreation users" has been added to the Recreation Opportunities, Designated Areas, Settings, and Access Technical Report summary section and the Ashley Assessment Recreation Opportunities, Designated Areas, Settings, and Access conclusions and future considerations.
Sweetwater County Board of County Commissioners, Wally Johnson	Sweetwater County appreciates the efforts of the Ashley in using reasonably up to date demographics and economic statistics and graphs. As the planning process progresses there will be a need to update these statistics and graphs with more current information. A good Wyoming source for this information can be found at the following Wyoming Division of Economic Analysis web page link: http://eadiv.state.wy.us/demog_data/demographic.html	The Assessment report is intended to be a rapid analysis of existing available information (see Forest Service Handbook 1909.12 - Land Management Planning Handbook, Chapter 10). As the Land Use Plan/EIS process proceeds, the Forest Service will update baseline social and economic data as available and appropriate. The recommended source will be reviewed for incorporation at that time.
Sweetwater County Board of County Commissioners, Wally Johnson	On page 73, in the Recreation and Tourism section, after the last paragraph, Sweetwater County requests that an additional paragraph be added that compares the economic and resource costs created by motorized, non-motorized and bicycle recreational users. Sweetwater County requests this addition to provide a more complete analysis of the economic contributions provided by these different recreational sectors.	It is noted that non-motorized, mechanized (biking), and motorized recreation users may have different levels of economic contributions. National Visitor Use Monitoring data on visitation is used to estimate the total economic contributions from Forest recreation but data is not readily available to estimate the economic contributions by recreation type. Specific contributions by activity type will be explored for the analysis completed for the NEPA process, as appropriate.

Sweetwater County Board of County Commissioners, Wally Johnson	* On page 74, in the Conclusions and Future Considerations section, the report states: "Based on current economic modeling and social input, the Ashley National Forest represents a minor contribution to the local economic and social stability in the region overall, though contributions at the community level may be more significant." Sweetwater County disagrees with this statement and believes it minimizes the importance of the Flaming Gorge National Recreation Area to economy the Ashley National Forest, Southwest Wyoming and the State of Wyoming. Sweetwater County believes that the NRA is of significant economic and social importance to the national forest and the region. The county believes that the Draft Assessment Report would be incomplete if it did not contain a more thorough economic and social analysis of the contribution of the NRA to the States of Wyoming and Utah and their counties and communities.	The Assessment report is intended to be a rapid analysis of existing available information (see Forest Service Handbook 1909.12 - Land Management Planning Handbook, Chapter 10). This assessment includes the social and economic contributions from the activities in the planning area, including those occurring on NFS lands in the Flaming Gorge National Recreation Area (NRA). The National Visitor Use Monitoring data used to estimate economic contributions is for the Ashley NF as a whole, which captures contributions from the Flaming Forge NRA. Additional analysis of specific contributions from the NRA will be explored for the baseline information and impacts analysis completed for NEPA process as appropriate.
Sweetwater County Board of County Commissioners, Wally Johnson	* On page 83, under the heading of Conclusions and Future Considerations, add, to the bulleted list of concerns, the following suggested bullet point: The significant level of tree mortality with the forest has increased the potential for wildfire within the forest. To reduce this fire potential and to increase the safety of visitors and of surrounding communities, forest management programs should be initiated and maintained to remove dead timber and to thin dense forest stands.	As addressed in the assessment, there are many factors such as climate (drought), vegetative conditions that contribute to the available burnable fuel and the number and cause of fires. The assessment does not address the specific economics associated with the potential tools used to treat vegetation, but it does identify where and why vegetation conditions have the potential for risk for current and future wildfires. With regard to travel management: As stated in the Infrastructure section, the published motorized travel plan from 2009 and travel analysis report from 2015 will be incorporated into the revised forest plan and will not be readdressed in the revision process. Based on the 2012 planning rule, assessments are intended to provide clear information for what needs to change in the forest plan. It does not cover the objection process or litigation associated with individual lawsuits from the other projects and activities that implement land management plans requiring an environmental analysis or environmental impact statement.
Sweetwater County Board of County Commissioners, Wally Johnson	On either page 86 or 87, under the heading of Oil and Natural Gas, add a sentence that identifies whether or not oil and gas within the Flaming Gorge National Recreation Area is available or unavailable for leasing. It is the understanding of Sweetwater County that the NRA is currently closed to oil and gas leasing and development.	The Flaming Gorge National Recreation Area is not currently available for new federal oil and gas or oil shale leasing. We do not expect that status to change in the near future, or to occur without preparation of a formal oil and gas or oil shale leasing analysis beforehand.
Sweetwater County Board of County Commissioners, Wally Johnson	On pages 86 and 88, under the heading of Leasable Minerals/Sodium Minerals, we thank the Ashley for recognizing the small area within the NRA that is leased for sodium development (Trona).	Thank you for your support.
Sweetwater County Board of County Commissioners, Wally Johnson	Sweetwater County request that a section discussing campground infrastructure should be added. This new section should highlight the increased demands for campground space, the need for additional maintenance, the lack of infrastructure funding and the need to identify actions to prevent the closure of campgrounds.	Campground infrastructure deferred maintenance, lack of funding, and increased demand is discussed in the Recreation Current Activity, Trends, and Conditions, Developed Recreation and Sustainable Recreation sections of the Recreation Technical Report. Current and past actions to keep campgrounds open and usable with declining budgets are also discussed in the Sustainable Recreation section of the Recreation Technical Report.
Sweetwater County Board of County Commissioners, Wally Johnson	On page 96, in reference to roads within the Flaming Gorge National Recreation Area, Sweetwater County recognizes that, in 2009, the Ashley National Forest completed its comprehensive motorized travel plan and that plan will not be readdressed in the current forest plan revision process. However, Sweetwater County would like to emphasize that it opposes the closing of roads within the Wyoming portion of the NRA without prior approval of Sweetwater County.	The management of system roads and routes is generally addressed in the Travel Management Plan or at the site specific NEPA level. Closure of non-system routes on the Forest is an administrative process and will not be addressed in the assessment. Regarding the 2001 Roadless Rule and timber suitability, the 2012 Planning Rule requires the Forest Service to determine "Lands not Suitable for Timber Production" (36 CFR 219.11). This includes lands where statute, executive order, or regulation prohibits timber production on the land or The Secretary of Agriculture or the Chief has withdrawn the land from timber production (36 CFR 219.11(a)). The directives associated with the 2012 Planning Rule define Inventoried Roadless Areas as Administratively Designated Areas by the Secretary of Agriculture (FSH 1909.12, 24 Exhibit 01 and 61.11). This analysis will occur later in the plan revision process. The statement, "In 2001, the Roadless Rule decreased the amount of area suitable for timber harvest to 135,000 acres, or roughly 10 percent of the Ashley National Forest. The remaining lands (approximately 1,265,000 acres) are classified as unsuitable for timber production due to factors such as steep slopes, lack of timber-producing vegetation types, or designated areas where harvesting timber is not in keeping with area resource objectives" was included in the draft assessment to explain one reason why it has been difficult for the Forest to average more than 5.7 million board feet over the last 10 years. However, there is enough context in the paragraph for this statement to be removed and still disclose the conditions and trends of wood product removal on the Forest.
Sweetwater County Board of County Commissioners, Wally Johnson	On page 98, Sweetwater County appreciates the Ashley recognizing the cooperation of counties in assisting the forest in maintaining some forest service roads.	The management of system roads and routes is generally addressed in the Travel Management Plan or at the site specific NEPA level. Closure of non-system routes on the Forest is an administrative process and will not be addressed in the assessment. Regarding the 2001 Roadless Rule and timber suitability, the 2012 Planning Rule requires the Forest Service to determine "Lands not Suitable for Timber Production" (36 CFR 219.11). This includes lands where statute, executive order, or regulation prohibits timber production on the land or The Secretary of Agriculture or the Chief has withdrawn the land from timber production (36 CFR 219.11(a)). The directives associated with the 2012 Planning Rule define Inventoried Roadless Areas as Administratively Designated Areas by the Secretary of Agriculture (FSH 1909.12, 24 Exhibit 01 and 61.11). This analysis will occur later in the plan revision process. The statement, "In 2001, the Roadless Rule decreased the amount of area suitable for timber harvest to 135,000 acres, or roughly 10 percent of the Ashley National Forest. The remaining lands (approximately 1,265,000 acres) are classified as unsuitable for timber production due to factors such as steep slopes, lack of timber-producing vegetation types, or designated areas where harvesting timber is not in keeping with area resource objectives" was included in the draft assessment to explain one reason why it has been difficult for the Forest to average more than 5.7 million board feet over the last 10 years. However, there is enough context in the paragraph for this statement to be removed and still disclose the conditions and trends of wood product removal on the Forest.
Sweetwater County Board of County Commissioners, Wally Johnson	On page 99, within the Conclusion and Future Consideration section, Sweetwater County suggests adding a paragraph that highlights the importance of maintaining campground infrastructure including bathrooms and potable water systems in order to keep campgrounds open and useable by the public.	Campground infrastructure deferred maintenance, lack of funding, and increased demand is discussed in the Recreation Current Activity, Trends, and Conditions, Developed Recreation and Sustainable Recreation sections of the Recreation Technical Report. Current and past actions to keep campgrounds open and usable with declining budgets are also discussed in the Sustainable Recreation section of the Recreation Technical Report.
Sweetwater County Board of County Commissioners, Wally Johnson	On page 103, under the Utility Corridors or Rights-of-Way sections, to help protect the Flaming Gorge from potential water pollution, Sweetwater County recommends adding the following suggested sentence: "If a pipeline ruptures, within a designated Flaming Gorge pipeline corridor or right of way, the rupture could cause potential water pollution and harm to the world class fisheries within the Flaming Gorge. To prevent this problem from occurring, consideration should be given to prohibiting pipeline corridors or rights-of-way within the Flaming Gorge National Recreation Area."	A statement has been added to the final working draft of the assessment that clarifies this.
The Wilderness Society, Allison Flint	While we found the recreation information in the assessment generally to be accurate and of high quality, the assessment of designated areas is severely lacking and must be improved in the final assessment report and corresponding technical reports.	The full list of designated areas will be added to the Final Assessment Report
The Wilderness Society, Allison Flint	The draft assessment report's identification and assessment of existing designated areas is incomplete, with a number of existing designated areas omitted. First, it fails to include Inventoried Roadless Areas (IRAs), which are administratively established designated areas protected under the Roadless Area Conservation Rule. IRAs "provide large, relatively undisturbed blocks of habitat for a variety of terrestrial and aquatic wildlife and plants, including hundreds of threatened, endangered, or sensitive species[...]. . . function as biological strongholds and refuges for a number of species, and . . . play a key role in maintaining native plant and animal communities and biological diversity." The final assessment report must identify existing IRAs, including their locations and acreages, and basic information about their ecological and social benefits. For instance, the Gila National Forest's recent assessment report (pp. 588-591, available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd54951.pdf) provides a relatively robust discussion of IRAs, including a map and table identifying the forest's 29 IRAs.	Information on the Ashley Inventoried Roadless Areas and Research Natural Areas have been added to the Recreation, Designated Areas, Settings, and Access Technical Report. The information added to the Technical Report has been summarized in the Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest, Recreation, Designated Areas, Settings, and Access section.
The Wilderness Society, Allison Flint	the draft assessment report fails to provide sufficient information about the forest's seven existing Research Natural Areas (RNAs), which span 7,393 acres. The RNAs should be identified, with their names, acreages, locations, and relevant ecological characteristics or values described.	Research Natural Areas (RNAs) are important special land designations on National Forest System lands. The 2012 planning rule does not require an evaluation of existing RNAs, or for a Forest to make a recommendation for more RNAs during the forest plan revision process. A description of existing RNAs on the Forest could be included when describing existing conditions during the EIS analysis.
The Wilderness Society, Allison Flint	the draft assessment report fails to identify dozens of significant caves on the forest that are protected under the Federal Cave Resources Protection Act.	The Ashley National Forest intends to continue to identify and manage significant natural caves, as required under the Federal Cave Resources Protection Act, and as time and budgets allow. We hope to develop plans for future management of significant caves and important karst areas, as part of this forest planning effort. Although numerous natural caves and karst areas are known to exist on the Forest, not every cave or karst area needs its own unique or dedicated management plan. The draft assessment notes that 41 caves within the Ashley National Forest have been identified and designed as significant federal caves. However, the names, locations, and resources of significant federal caves are protected and kept confidential, to protect their unique resources from deliberate or inadvertent harm, in accordance with agency regulations and the 1988 Federal Cave Resources Protection Act.
The Wilderness Society, Allison Flint	the draft assessment report fails to identify any designated critical habitat or National Historic Landmarks located on the forest.	The Ashley National Forest does not have any designated critical habitat or National Historic Landmarks.
The Wilderness Society, Allison Flint	the assessment report should identify designated areas on adjacent state, county, or federal lands, including but not limited to the Ashley Springs Water Protection Zone, established by Uintah County Ordinance in 2013.	The draft assessment primarily considered conditions within the planning area, which consists of the Ashley National Forest. Effects to adjacent designated areas could be considered in the EIS under cumulative effects.
The Wilderness Society, Allison Flint	We suggest that the Forest Service review the table of designated areas provided in section 24 (Exhibit 01) of the Forest Service Handbook 1909.12 to ensure it has accurately captured all existing designated areas on the forest.	The full list of designated areas will be added to the Final Assessment Report
The Wilderness Society, Allison Flint	The draft assessment report fails to provide the best available scientific information on the numerous ecological and social benefits of designated areas. These benefits are directly relevant to the forest's obligation under the 2012 planning rule to provide for ecological integrity and species diversity in a climate change world. See 36 C.F.R. § 219.8-219.10. Inclusion of the following paragraph in the final assessment report's discussion of designated areas would provide a concise and accurate summary of those benefits, based on the best available scientific information: The best available scientific information documents the numerous ecological benefits and services provided by roadless and other undeveloped natural areas. These areas play a key role in conserving biodiversity (Loucks et al. 2003). They enhance the representation of different ecosystems, thereby preserving refugia for species (Dietz et al. 2015). They facilitate connectivity (Belote et al. 2015; Loucks et al. 2003). They provide high-quality or undisturbed water, soil, and air resources (Anderson et al. 2012; Dellasala et al. 2011). And they serve as ecological baselines to facilitate better understanding of our impacts to other landscapes and as reference areas for ecological restoration (Arcese and Sinclair 1997). Land management plans are required to provide for these and other ecological services. 36 C.F.R. § 219.8-219.9. In addition, undeveloped natural areas provide important social and economic services, including unsurpassed recreational and scenic opportunities, places to connect with nature and spirit, and contributions to the local tourism industry (Headwaters Economics 2012; Rasker et al. 2009). Protecting these areas through administrative designations provides some level of protection for these services and the values for which the areas were designated. 36 C.F.R. 219.19. The Gila National Forest's recent final assessment report included much of this information at page 576 under the header "Ecosystem Services of Designated Areas." Similarly, the Rio Grande National Forest's assessment report included robust discussions of the ecological roles of designated areas and their contribution to sustainability (Ch. 15, pp. 20-22, available at https://www.fs.usda.gov/detail/riogrande/landmanagement/projects/?cid=fspr479245&width=full).	The draft assessment addresses the ecological and socioeconomic benefits of designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses the socioeconomic benefits in Important Designated Areas, Recreational Sites, and Other Areas.
The Wilderness Society, Allison Flint	the Ashley National Forest's draft assessment report fails to include any discussion of the potential need and opportunity for additional designated areas. This deficiency must be remedied in the final assessment report. To address this deficiency, we suggest that the final assessment report include the following language: "The forest assessment is required to evaluate the potential need and opportunity for additional designated areas, including but not limited to recommended wilderness, eligible wild and scenic rivers, and Research Natural Areas. 36 C.F.R. § 219.6(b)(15). This evaluation is intended to inform the corresponding requirement to determine, as part of the plan revision, whether to designate or recommend for designation any additional areas. 36 C.F.R. § 219.7(c)(2)(v)-(vi). While any potential wilderness recommendations or eligible wild and scenic river designations will be identified and fully vetted with the public through the ongoing Chapter 70 and Chapter 80 processes, there is a potential opportunity to provide additional protection to portions of the forest's vast complex of largely undeveloped natural areas. These areas - including Utah's largest wilderness and surrounding roadless lands - are among the Ashley National Forest's greatest assets. Roadless lands on the Ashley National Forest provide important ecosystem services, and managing them to protect those services will contribute to ecological sustainability by preserving intact natural systems that serve as biological strongholds for species and reference areas in the face of climate change and other stressors. Particularly as climate change alters and makes more vulnerable ecological systems, habitats, and species composition and distribution, there is a need to conserve migratory corridors, representation within protected areas, larger protected tracts, and more connections between them (Mawdsley et al. 2009). Roadless areas also provide opportunities for dispersed outdoor recreation and to connect people with nature, and they contribute to the local tourism economy. There is a potential need and opportunity for additional recommended wilderness, eligible wild and scenic rivers, and other special designations to protect and connect highly deserving areas and resources, meet ecological needs for species, and enhance sustainable recreation opportunities. The potential need and opportunity for additional designated areas must be balanced with providing for other multiple uses and more active management strategies. To satisfy the potential ecological and social need for additional designated areas, opportunities should focus on areas that enhance terrestrial and aquatic connectivity, provide important habitat for sensitive species, contribute to ecosystem representation and biological diversity, and provide quality opportunities to connect people with nature. Such areas may include, but are not limited to, recommended additions to the High Uintas Wilderness, important cave, fossil, and fen resources, areas currently included in the forest's "Rugged Backcountry" recreation niche setting, educational areas for youth, important wildlife habitat and migratory corridors, and important watershed protection zones. Areas potentially suitable for recommended wilderness designation and potentially eligible wild and scenic river segments will be identified and vetted through the Chapter 70 and Chapter 80 processes.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas. These ecosystems are described in the Assessing Terrestrial and Aquatic Ecosystems section under Rare Habitat Types. These ecosystems were described because they are believed to be minimally represented in the planning area and could potentially be considered as designated areas and evaluated in the EIS analysis.
The Wilderness Society, Allison Flint	a corresponding technical report on designated areas should provide additional information to support the assessment of the potential need and opportunity for additional designated areas.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas. These ecosystems are described in the Assessing Terrestrial and Aquatic Ecosystems section under Rare Habitat Types. These ecosystems were described because they are believed to be minimally represented in the planning area and could potentially be considered as designated areas and evaluated in the EIS analysis.
The Wilderness Society, Allison Flint	1.1. What areas of the forest outside of designated wilderness have roadless character? This should include existing IRAs protected under the Roadless Area Conservation Rule, as well as newly inventoried areas identified through the Chapter 70 wilderness inventory.	Information on the Ashley Inventoried Roadless Areas and Research Natural Areas have been added to the Recreation, Designated Areas, Settings, and Access Technical Report. The information added to the Technical Report has been summarized in the Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest, Recreation, Designated Areas, Settings, and Access section.
The Wilderness Society, Allison Flint	a forest assessment's evaluation of the potential need and opportunity for additional designated areas should consider whether there are "specific land types or ecosystems present in the plan area that are not currently represented or minimally represented." Forest Service Handbook (FSH) 1909.12, ch. 10, § 1414(c). That analysis of ecosystem representation in turn will help inform the Forest Service's determination during the plan revision process whether to designate or recommend for designation additional areas.2 It will also assist the agency in satisfying its substantive planning mandates to provide for ecological sustainability and integrity and "the diversity of plant and animal communities and the persistence of native species."3 The draft assessment report includes some relevant information about ecosystem and habitat types that should be cross-referenced and integrated into the assessment of potential need and opportunity for additional designated areas. For instance, the terrestrial ecosystems section (pp. 21-22) discusses rare habitat types, including fens, that may lend themselves to a special designated area or conservation watershed designation. And the draft assessment report recognizes that many existing protected areas are at elevations unsuitable for all wildlife species (p. 34). Other forests, including the Gila (final assessment report, pp. 605-606), the Nez-Perce Clearwater (see https://www.fs.usda.gov/detail/nezperceclearwater/landmanagement/planning/?cid=stelpr3844850), and the Sierra, Sequoia, and Inyo (Draft EIS, Appendix B, p. 25, available at https://www.fs.usda.gov/detail/s/landmanagement/planning/?cid=STELPRD3802842), have integrated analyses of ecosystem representation into their assessments and wilderness recommendation processes. Recent published papers by TWS research scientists (Dietz et al. 2015; Belote et al. 2015) articulate a peer-reviewed methodology for conducting this sort of analysis.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas. These ecosystems are described in the Assessing Terrestrial and Aquatic Ecosystems section under Rare Habitat Types. These ecosystems were described because they are believed to be minimally represented in the planning area and could potentially be considered as designated areas and evaluated in the EIS analysis.
The Wilderness Society, Allison Flint	The Ashley National Forest includes a number of important watersheds and water resources that should be identified in the assessment report, including in the context of a potential need and opportunity for additional designated areas. These resources are particularly important as climate change and other human-caused stressors threaten water supplies. For instance, water descends into Lost Creek Sink on the neighboring Wasatch-Cache, travels 14 miles through the Madison aquifer, emerges at Big Springs, and forms important spawning habitat for Flaming Gorge Kokanee salmon. Dozens of glacial cirque lakes were created by glacial scouring of the upper parts of the Uinta's streams just 10,000 years ago and are threatened by sedimentation. Both the north flank of the Uintas in the Flaming Gorge District, and the south flank of the Uintas in Vernal and Roosevelt Districts have major streams that are supported by extensive karst systems of the Madison Limestone. The downstream exits of these karst systems feed springs that are major water sources for the communities in Daggett, Duchesne, and Uintah counties. To protect its municipal water supply, Uintah County has proposed a "watershed protection zone" focused on the Dry Fork Sink to Ashley Spring karst system.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas. These ecosystems are described in the Assessing Terrestrial and Aquatic Ecosystems section under Rare Habitat Types. These ecosystems were described because they are believed to be minimally represented in the planning area and could potentially be considered as designated areas and evaluated in the EIS analysis.
The Wilderness Society, Allison Flint	The draft assessment report also recognizes three types of fens as a rare habitat type (pp. 21-22). The rare and important fen resources on the Ashley should be integrated into the assessment of designations.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas. These ecosystems are described in the Assessing Terrestrial and Aquatic Ecosystems section under Rare Habitat Types. These ecosystems were described because they are believed to be minimally represented in the planning area and could potentially be considered as designated areas and evaluated in the EIS analysis.
The Wilderness Society, Allison Flint	The Ashley includes unique and extensive cave resources, including 41 "significant caves" protected under the Federal Cave Resources Protection Act. These caves - many of which are unexplored - are connected to the ground and surface water resources described above. Also related to important and unique water resources on the Ashley are the significant historical sites associated with prominent geological events such as the Sheep Creek debris flow in the mid-1960s and the breach of the Mosby Canal in the Dry Fork watershed in the 1950s. The Ashley also includes other sites, facilities, and resources that lend themselves to educational and related opportunities to connect youth and underserved populations with nature. These include, but are not limited to, the Red Canyon Visitor Center, Cart Creek Firefighters Memorial, Ute Fire Tower, Youth Experimental Forest (in Brownie Canyon), Dry Fork Nature Trail, and Dry Fork Flame Interpretive Trail. Finally, the South Unit of the Ashley includes limited and unique groves of Bristlecone pine (<i>Pinus longaeva</i>) that are on the edge of the species' range. These unique sites and resources should be integrated into the assessment of potential need and opportunity for additional designations.	The Ashley National Forest intends to continue to identify and manage significant natural caves, as required under the Federal Cave Resources Protection Act, and as time and budgets allow. We hope to develop plans for future management of significant caves and important karst areas, as part of this forest planning effort. Although numerous natural caves and karst areas are known to exist on the Forest, not every cave or karst area needs its own unique or dedicated management plan. The draft assessment notes that 41 caves within the Ashley National Forest have been identified and designed as significant federal caves. However, the names, locations, and resources of significant federal caves are protected and kept confidential, to protect their unique resources from deliberate or inadvertent harm, in accordance with agency regulations and the 1988 Federal Cave Resources Protection Act.
The Wilderness Society, Allison Flint	the forest assessment should evaluate and document whether the size, distribution, and representation of its 7 existing RNAs satisfy each of the objectives enumerated in Forest Service Manual 4063.02. In doing so, the Forest Service should pay particular attention to: the need for and adequacy of connectivity between existing RNAs; how or whether those RNAs fit into a larger network of protected lands and corridors; and whether the RNAs encompass entire small drainages, exist or could be extended to a landscape scale, and are large enough to continue to represent the identified ecosystem(s) even with anticipated climate change effects. In addition, the Forest Service should compare its RNA network to state natural resource assessment priority areas and biodiversity data to identify potential deficiencies, and share that information in the assessment.	Research Natural Areas (RNAs) are important special land designations on National Forest System lands. The 2012 planning rule does not require an evaluation of existing RNAs, or for a Forest to make a recommendation for more RNAs during the forest plan revision process. A description of existing RNAs on the Forest could be included when describing existing conditions during the EIS analysis.
The Wilderness Society, Allison Flint	The draft assessment report includes some useful information on socio-economic factors relevant to protecting forest lands through conservation designations. For instance, it references the Headwaters Economics studies indicated a decline in extractive resource uses and the increasing economic importance of recreation and protected lands (p. 72). It also discusses the contributions of recreation to local economies, and anticipated increases in recreational visitation over the next 15 years (p. 62). This information should be cross-referenced and integrated into the assessment of potential need and opportunity for additional designated areas. The Rio Grande National Forest's assessment (ch. 15, pp. 21-22) includes particularly robust information on the contributions of protected areas and outdoor recreation to local economies.	The draft assessment addresses the ecological and socioeconomic benefits of designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses the socioeconomic benefits in Important Designated Areas, Recreational Sites, and Other Areas.
Anon Anon	I recommend removing or modifying the sentence in Paragraph 3 that states: "The invasion of cheatgrass may increase in piñon-juniper woodlands in the future, causing more frequent and possibly larger fires." This statement is misleading. The statement should indicate that cheatgrass may increase in areas where piñon and juniper have burned, especially if seeding treatments are not conducted in burned over areas. But cheatgrass is not increasing in healthy stands of piñon and juniper any more than it is increasing in every other vegetation type.	The recommended changes (in bold italics) to the draft assessment address the comments pertaining to fire ecology and exotics within piñon-juniper forests. Piñon-juniper forests consist primarily of Utah juniper and two-needle piñon pine, but may also include Rocky Mountain juniper. Piñon and juniper can be found on a variety of landtypes of the Ashley National Forest, as they are not as restricted as some vegetation types by the types of soils they grow in. Fire is a key ecological function influencing piñon-juniper health and diversity. Although low intensity surface fires occurred where understory fuel conditions allowed, most of these areas had fire frequencies over 200 years with stand replacement fires that consumed a majority of the vegetation. Under high or extreme weather conditions, many thousands of acres of mature piñon and juniper woodlands can now burn in a day. This prediction has been validated to some degree by recent large stand-replacing fires that have occurred in piñon-juniper forests, like the Mustang fire of 2002. This recent increase in large fires in piñon-juniper is also supported by Forest Service and Bureau of Land Management fire reports. In a study on the Ashley National Forest, a high diversity of understory plants was found when there was less than 20 percent canopy cover of piñon-juniper trees. Beyond 40 percent crown cover of piñon-juniper, the understory vegetation was greatly depleted. Other studies in the area indicate that fewer understory species leads to less resilience or ability of the native plant community to recover after a fire. Without an abundance of resilient perennial herbaceous species and sprouting shrubs, burned piñon-juniper sites are vulnerable to the spread of invasive plant species such as cheatgrass. Without post fire restoration efforts, cheatgrass could cause more frequent larger fires and increase homogeneity across the landscape. Both piñon pine and juniper are slow to recover from severe fires. Primary concerns with piñon-juniper forests are related to climate change and invasive species. There is likely to be a reduction in area dominated by piñon-juniper due to increased drought and temperatures and in areas of large, severe fires where invasive plant species are a threat to native plant diversity.

Anon Anon	I recommend removing or modifying the sentence in Paragraph 5 that states: "There is potential for large, stand-replacing crown fires in piñon-juniper woodlands over the next 150 years due to piñon-juniper forests having larger trees with increasing crown cover." This assumption is based off of an erroneous assumption in the specialist report	The recommended changes (in bold italics) to the draft assessment address the comments pertaining to fire ecology and exotics within piñon-juniper forests. Piñon-juniper forests consist primarily of Utah juniper and two-needle piñon pine, but may also include Rocky Mountain juniper. Piñon and juniper can be found on a variety of landtypes of the Ashley National Forest, as they are not as restricted as some vegetation types by the types of soils they grow in. Fire is a key ecological function influencing piñon-juniper health and diversity. Although low intensity surface fires occurred where understory fuel conditions allowed, most of these areas had fire frequencies over 200 years with stand replacement fires that consumed a majority of the vegetation. Under high or extreme weather conditions, many thousands of acres of mature piñon and juniper woodlands can now burn in a day. This prediction has been validated to some degree by recent large stand-replacing fires that have occurred in piñon-juniper forests, like the Mustang fire of 2002. This recent increase in large fires in piñon-juniper is also supported by Forest Service and Bureau of Land Management fire reports. In a study on the Ashley National Forest, a high diversity of understory plants was found there was less than 20 percent canopy cover of piñon-juniper trees. Beyond 40 percent crown cover of piñon-juniper, the understory vegetation was greatly depleted. Other studies in the area indicate that fewer understory species leads to less resilience or ability of the native plant community to recover after a fire. Without an abundance of resilient perennial herbaceous species and sprouting shrubs, burned piñon-juniper sites are vulnerable to the spread of invasive plant species such as cheatgrass. Without post fire restoration efforts, cheatgrass could cause more frequent larger fires and increase homogeneity across the landscape. Both piñon pine and juniper are slow to recover from severe fires. Primary concerns with piñon-juniper forests are related to climate change and invasive species. There is likely to be a reduction in area dominated by piñon-juniper due to increased drought and temperatures and in areas of large, severe fires where invasive plant species are a threat to native plant diversity.
Anon Anon	Paragraph 5 continues with, "This recent increase in large fires in piñon-juniper is also supported by Forest Service and Bureau of Land Management fire reports." These reports show a general increase in large fires in forested areas and not just in piñon-juniper woodlands.	The recommended changes (in bold italics) to the draft assessment address the comments pertaining to fire ecology and exotics within piñon-juniper forests. Piñon-juniper forests consist primarily of Utah juniper and two-needle piñon pine, but may also include Rocky Mountain juniper. Piñon and juniper can be found on a variety of landtypes of the Ashley National Forest, as they are not as restricted as some vegetation types by the types of soils they grow in. Fire is a key ecological function influencing piñon-juniper health and diversity. Although low intensity surface fires occurred where understory fuel conditions allowed, most of these areas had fire frequencies over 200 years with stand replacement fires that consumed a majority of the vegetation. Under high or extreme weather conditions, many thousands of acres of mature piñon and juniper woodlands can now burn in a day. This prediction has been validated to some degree by recent large stand-replacing fires that have occurred in piñon-juniper forests, like the Mustang fire of 2002. This recent increase in large fires in piñon-juniper is also supported by Forest Service and Bureau of Land Management fire reports. In a study on the Ashley National Forest, a high diversity of understory plants was found there was less than 20 percent canopy cover of piñon-juniper trees. Beyond 40 percent crown cover of piñon-juniper, the understory vegetation was greatly depleted. Other studies in the area indicate that fewer understory species leads to less resilience or ability of the native plant community to recover after a fire. Without an abundance of resilient perennial herbaceous species and sprouting shrubs, burned piñon-juniper sites are vulnerable to the spread of invasive plant species such as cheatgrass. Without post fire restoration efforts, cheatgrass could cause more frequent larger fires and increase homogeneity across the landscape. Both piñon pine and juniper are slow to recover from severe fires. Primary concerns with piñon-juniper forests are related to climate change and invasive species. There is likely to be a reduction in area dominated by piñon-juniper due to increased drought and temperatures and in areas of large, severe fires where invasive plant species are a threat to native plant diversity.
Anon Anon	Page 65 The assessment erroneously states: "Although, the comparatively short history of piñon-juniper dominance here indicates large fires might be rather new to this system." According to Tausch (1999), Piñon and juniper have been present on the landscape since the early Holocene along with other tree species such as Ponderosa Pine, Lodgepole Pine, and Aspen. Don't insinuate that piñon and juniper have a "comparatively short history" on the landscape unless you are also planning to discuss that Ponderosa Pine and Lodgepole Pine also have a comparatively short history on the landscape. (For additional clarification on the chronology of piñon pine, see the discussion on natural range of variation below).	The recommended changes (in bold italics) to the draft assessment address the comments pertaining to fire ecology and exotics within piñon-juniper forests. Piñon-juniper forests consist primarily of Utah juniper and two-needle piñon pine, but may also include Rocky Mountain juniper. Piñon and juniper can be found on a variety of landtypes of the Ashley National Forest, as they are not as restricted as some vegetation types by the types of soils they grow in. Fire is a key ecological function influencing piñon-juniper health and diversity. Although low intensity surface fires occurred where understory fuel conditions allowed, most of these areas had fire frequencies over 200 years with stand replacement fires that consumed a majority of the vegetation. Under high or extreme weather conditions, many thousands of acres of mature piñon and juniper woodlands can now burn in a day. This prediction has been validated to some degree by recent large stand-replacing fires that have occurred in piñon-juniper forests, like the Mustang fire of 2002. This recent increase in large fires in piñon-juniper is also supported by Forest Service and Bureau of Land Management fire reports. In a study on the Ashley National Forest, a high diversity of understory plants was found there was less than 20 percent canopy cover of piñon-juniper trees. Beyond 40 percent crown cover of piñon-juniper, the understory vegetation was greatly depleted. Other studies in the area indicate that fewer understory species leads to less resilience or ability of the native plant community to recover after a fire. Without an abundance of resilient perennial herbaceous species and sprouting shrubs, burned piñon-juniper sites are vulnerable to the spread of invasive plant species such as cheatgrass. Without post fire restoration efforts, cheatgrass could cause more frequent larger fires and increase homogeneity across the landscape. Both piñon pine and juniper are slow to recover from severe fires. Primary concerns with piñon-juniper forests are related to climate change and invasive species. There is likely to be a reduction in area dominated by piñon-juniper due to increased drought and temperatures and in areas of large, severe fires where invasive plant species are a threat to native plant diversity.
Anon Anon	Page 66, paragraph 2. The assessment erroneously states: "the greatest departure from historical vegetative composition . . . is a function of the low resilience and high vulnerability of piñon and juniper communities to invasive plant species." "This rapid colonization by invasive annuals is currently a pattern common of piñon-juniper communities across the West." In reality, as shown by Tausch (1999) and Nowak and others (1999), the colonization of invasive annuals is a result of the absence of piñon-juniper woodlands. When piñon and juniper woodland are removed because of fire or mechanical treatments, then invasive annuals take over. Invasive annuals are usually not an issue within mature piñon-juniper woodlands. It is only after their removal by fire that we see "the explosive ability of cheatgrass to increase" (Goodrich and Rooks 1999, Page 403).	The commenter's concern refers to discussion in the Draft Terrestrial Ecosystems Technical Report on the low resilience and high vulnerability of piñon-juniper communities to invasive plant species. The commenter is also concerned that the assessment is using this vulnerability to devalue the topic. The commenter makes note that the relationship of piñon-juniper and invasives is evident upon disturbance and that this connection is not made apparent in the discussion. In the context of the greater discussion, however, the relationship of piñon-juniper with invasive plant species is referred to many times in its connection to disturbance such as fire. Please see the following in the Draft Terrestrial Ecosystems Technical Report: Page 66: "The vulnerability of piñon-juniper sites that are lacking resilient perennial herbaceous species was vividly demonstrated by the great abundance of invasive annual species found following the Mustang Fire of 2002. Tumble mustard and, to a lesser extent, Russian thistle became the dominant species over large areas two years after the burn. This departure is a function of the low resilience and high vulnerability of piñon and juniper communities to invasive plant species. Much of this departure was observed after the 2002 Mustang Fire. Following this fire, tumble mustard, prickly Russian thistle, and cheatgrass increased rapidly." "The flush of invasive annual forbs in the area burned by the Mustang Fire appears to have reached maximum distribution, and these annuals can be expected to decrease in some areas as perennial grasses, including seeded species, increase. However, this might not be the case in areas dominated by cheatgrass. This invasive species has increased more slowly than tumble mustard and prickly Russian thistle, however, it has continued to increase steadily after the burn. The response of cheatgrass in other areas of the West after disturbance indicates it can be expected to increase in the burned area." The Ashley is in agreement that piñon and juniper are integral parts of the ecosystem. The discussion was only meant to point out the greatest vulnerabilities and risks to the woodland ecosystem that need addressed as we move into the next phase of Forest Plan revision.
Anon Anon	Page 66, paragraph 4. The tone of the assessment insinuates that piñon and juniper trees are an unwanted species that allow invasive species, such as cheatgrass, to spread. When in reality, piñon and juniper are integral parts of the ecosystem and often grow in areas that are inhospitable to other tree species. An example of the tone is evident when the assessment states "piñon and juniper do have the capacity to dominate all lands . . . Even the margins of these tree-free areas showed evidence of advancing piñon-juniper." Whereas, when the advancement of Ponderosa Pine eliminates other species, the assessment describes it as: "natural under-burning on a frequent fire return interval eliminates other less fire-tolerant conifers and maintains dominance of the ponderosa pine." The assessment needs to be objective when describing the strengths and weaknesses of various species, rather than letting personal preference color the narrative in favor of commercial timber species over other tree species.	The commenter's concern refers to discussion in the Draft Terrestrial Ecosystems Technical Report on the low resilience and high vulnerability of piñon-juniper communities to invasive plant species. The commenter is also concerned that the assessment is using this vulnerability to devalue the topic. The commenter makes note that the relationship of piñon-juniper and invasives is evident upon disturbance and that this connection is not made apparent in the discussion. In the context of the greater discussion, however, the relationship of piñon-juniper with invasive plant species is referred to many times in its connection to disturbance such as fire. Please see the following in the Draft Terrestrial Ecosystems Technical Report: Page 66: "The vulnerability of piñon-juniper sites that are lacking resilient perennial herbaceous species was vividly demonstrated by the great abundance of invasive annual species found following the Mustang Fire of 2002. Tumble mustard and, to a lesser extent, Russian thistle became the dominant species over large areas two years after the burn. This departure is a function of the low resilience and high vulnerability of piñon and juniper communities to invasive plant species. Much of this departure was observed after the 2002 Mustang Fire. Following this fire, tumble mustard, prickly Russian thistle, and cheatgrass increased rapidly." "The flush of invasive annual forbs in the area burned by the Mustang Fire appears to have reached maximum distribution, and these annuals can be expected to decrease in some areas as perennial grasses, including seeded species, increase. However, this might not be the case in areas dominated by cheatgrass. This invasive species has increased more slowly than tumble mustard and prickly Russian thistle, however, it has continued to increase steadily after the burn. The response of cheatgrass in other areas of the West after disturbance indicates it can be expected to increase in the burned area." The Ashley is in agreement that piñon and juniper are integral parts of the ecosystem. The discussion was only meant to point out the greatest vulnerabilities and risks to the woodland ecosystem that need addressed as we move into the next phase of Forest Plan revision.
Anon Anon	Page 111 This section mischaracterizes the historic extent of piñon juniper woodland in the plan area. Tausch (1999) discusses the expansion and contraction of piñon and juniper woodlands across the Great Basin over the past 11,500 years. Tausch (1999) discusses how these climatic shifts have modified all vegetation species, not just Piñon and juniper. The statement in the specialist report that there has been "an increase in area, crown closure, and especially density of piñon-juniper woodlands since European settlement" is taken out of context. Tausch (1999) indicates that climatic changes over the past 150 years (since the Little Ice Age) have created an environment that favors the "dominance of large woody perennials" and enables "trees to successfully establish into and dominate many new communities" (Tausch 1999, page 14). The reference indicates that a variety of trees have expanded their range over the past 150 years and not just piñon and juniper.	The assessment used many reference materials to describe piñon-juniper's historical extent and chronology. The Tausch (1999) reference in question referred heavily throughout the document to piñon-juniper woodlands, having itself used a vast array of references (with little exception) specific to piñon-juniper expansion in the last 150 years. The Tausch and Nowak (1999) reference also concludes that during the Little Ice Age, "piñon-juniper woodlands in the Great Basin generally had more open areas" and "with the combination of climate change following the Little Ice Age and settlement impacts, expansion of the woodlands has been observed throughout the Great Basin and adjacent areas. This expansion has more than tripled the area in the Great Basin dominated by woodlands". The Johnson (2000) reference in question does state that the first "definitive evidence for presence of piñon" in the Dutch John area dates to the end of the period 5800-4100 BP (page 216). This time frame is consistent with the statement in the assessment that "piñon-juniper woodlands probably appeared in Dutch John area sometime after 6000 BP" (page 111). The Johnson paper refers at times to speculative "arrival" of piñon pine and that juniper (and piñon) likely began to dominate on the wooded ridges around 4100 BP (pages 214-216) while sagebrush and grasses dominated the flats. The paper also states that most of the "Dutch John sites are within present day piñon-juniper woodlands" (page 207). Because piñon-juniper woodlands now dominate the area, it can be deduced that piñon and juniper tree numbers have increased since the beginning of the late Holocene. In conclusion, the citations/references used in the assessment are applicable and appropriate to the discussions, but will be edited to state the reference material more accurately. It was not meant to make the case that piñon-juniper has been on the landscape a short while and therefore it does not belong. On the contrary, its presence since the beginning of the late Holocene, before the influence of settlement, strengthens the case that our piñon-juniper woodlands are persistent. Since settlement, however, human influences have contributed to tree expansion (this condition is discussed in the segments on sagebrush communities in the assessment), tree density, and increased potential for large, stand-replacing crown fires (Gruell 1999). Human influences include a decrease in wildfire frequency along with increasing wildfire suppression efforts, the introduction of exotic annuals, and an increase in atmospheric CO 2 levels (Tausch 1999). To address persistent versus expansion piñon-juniper, a key (Romme 2007) will also be suggested as part of the assessment to address future piñon-juniper classifications. Romme, W., C. Allen, J. Bailey, W. Baker, B. Bestelmeyer, P. Brown, K. Eisenhart, L. Floyd-Hanna, D. Huffman, B. Jacobs, R. Miller, E. Muldavin, T. Swetnam, R. Tausch and P. Weisberg. 2007. Historical Modern Disturbance Regimes of Piñon-Juniper Vegetation in the Western U.S.
Anon Anon	This section also mischaracterizes the archaeological evidence for the chronology of piñon and juniper woodlands in the plan area. The Terrestrial Ecosystems Assessment report on page 111 states: "Johnson (2000) . . . noted, "an extremely large increase in Pinus pollen since the nineteenth century at Dutch John." This seems to indicate a marked increase in piñon pine in recent time." Johnson (2000, page 220, paragraph 6) actually states: "Increases in Artemisia, coupled with large decreases in Chenopods and juniper, and an extremely large increase in Pinus pollen since the nineteenth century suggest a cooler, wetter, more wooded environment today than during the preceding 1300 years." In this context, "Pinus" does not refer solely to piñon pine, it "refers to any member of the genus Pinus, which includes four different species in the eastern Uinta Mountains: P. contorta (Lodgepole pine), P. edulis (Piñon pine), P. flexilis (Limber pine), and P. ponderosa (Ponderosa pine)" (Johnson 2000, page 207). This erroneous interpretation of Johnson (2000) is then used to justify statements such as: "the comparatively short history of piñon-juniper dominance here indicates large fires might be rather new to this system." (Page 65 of Specialist Report). It is extremely important to use the best science available and to interpret the scientific documentation in an accurate context.	The assessment used many reference materials to describe piñon-juniper's historical extent and chronology. The Tausch (1999) reference in question referred heavily throughout the document to piñon-juniper woodlands, having itself used a vast array of references (with little exception) specific to piñon-juniper expansion in the last 150 years. The Tausch and Nowak (1999) reference also concludes that during the Little Ice Age, "piñon-juniper woodlands in the Great Basin generally had more open areas" and "with the combination of climate change following the Little Ice Age and settlement impacts, expansion of the woodlands has been observed throughout the Great Basin and adjacent areas. This expansion has more than tripled the area in the Great Basin dominated by woodlands". The Johnson (2000) reference in question does state that the first "definitive evidence for presence of piñon" in the Dutch John area dates to the end of the period 5800-4100 BP (page 216). This time frame is consistent with the statement in the assessment that "piñon-juniper woodlands probably appeared in Dutch John area sometime after 6000 BP" (page 111). The Johnson paper refers at times to speculative "arrival" of piñon pine and that juniper (and piñon) likely began to dominate on the wooded ridges around 4100 BP (pages 214-216) while sagebrush and grasses dominated the flats. The paper also states that most of the "Dutch John sites are within present day piñon-juniper woodlands" (page 207). Because piñon-juniper woodlands now dominate the area, it can be deduced that piñon and juniper tree numbers have increased since the beginning of the late Holocene. In conclusion, the citations/references used in the assessment are applicable and appropriate to the discussions, but will be edited to state the reference material more accurately. It was not meant to make the case that piñon-juniper has been on the landscape a short while and therefore it does not belong. On the contrary, its presence since the beginning of the late Holocene, before the influence of settlement, strengthens the case that our piñon-juniper woodlands are persistent. Since settlement, however, human influences have contributed to tree expansion (this condition is discussed in the segments on sagebrush communities in the assessment), tree density, and increased potential for large, stand-replacing crown fires (Gruell 1999). Human influences include a decrease in wildfire frequency along with increasing wildfire suppression efforts, the introduction of exotic annuals, and an increase in atmospheric CO 2 levels (Tausch 1999). To address persistent versus expansion piñon-juniper, a key (Romme 2007) will also be suggested as part of the assessment to address future piñon-juniper classifications. Romme, W., C. Allen, J. Bailey, W. Baker, B. Bestelmeyer, P. Brown, K. Eisenhart, L. Floyd-Hanna, D. Huffman, B. Jacobs, R. Miller, E. Muldavin, T. Swetnam, R. Tausch and P. Weisberg. 2007. Historical Modern Disturbance Regimes of Piñon-Juniper Vegetation in the Western U.S.
Anon Anon	Please include the following references in the bibliography of the Specialist report. They are referenced in the report but do not have a bibliographic entry in the specialist report. Johnson, Clay 2000. Chapter 5: Climate and Environment. In Dutch John Excavations: Seasonal Occupations on the North Slope of the Uinta Mountains, Edited by Byron Looole and Clay Johnson (Pages 205-222. USDA Forest Service, Ashley National Forest, Heritage Report 1-01/2000. Tausch, Robin J. 1999. Piñon and Juniper Woodland Occupations In Proceedings: Ecology and Management of Piñon-Juniper Communities Within the Interior West, (Pages 12-19). USDA Forest Service, Rocky Mountain Research Station, RMRS-P-9. Nowak, Robert S., Darrin J. Moore, and Robin J. Tausch. Ecophysiological Patterns of Piñon and Juniper In Proceedings: Ecology and Management of Piñon-Juniper Communities Within the Interior West, (Pages 35-46). USDA Forest Service, Rocky Mountain Research Station, RMRS-P-9.	The assessment used many reference materials to describe piñon-juniper's historical extent and chronology. The Tausch (1999) reference in question referred heavily throughout the document to piñon-juniper woodlands, having itself used a vast array of references (with little exception) specific to piñon-juniper expansion in the last 150 years. The Tausch and Nowak (1999) reference also concludes that during the Little Ice Age, "piñon-juniper woodlands in the Great Basin generally had more open areas" and "with the combination of climate change following the Little Ice Age and settlement impacts, expansion of the woodlands has been observed throughout the Great Basin and adjacent areas. This expansion has more than tripled the area in the Great Basin dominated by woodlands". The Johnson (2000) reference in question does state that the first "definitive evidence for presence of piñon" in the Dutch John area dates to the end of the period 5800-4100 BP (page 216). This time frame is consistent with the statement in the assessment that "piñon-juniper woodlands probably appeared in Dutch John area sometime after 6000 BP" (page 111). The Johnson paper refers at times to speculative "arrival" of piñon pine and that juniper (and piñon) likely began to dominate on the wooded ridges around 4100 BP (pages 214-216) while sagebrush and grasses dominated the flats. The paper also states that most of the "Dutch John sites are within present day piñon-juniper woodlands" (page 207). Because piñon-juniper woodlands now dominate the area, it can be deduced that piñon and juniper tree numbers have increased since the beginning of the late Holocene. In conclusion, the citations/references used in the assessment are applicable and appropriate to the discussions, but will be edited to state the reference material more accurately. It was not meant to make the case that piñon-juniper has been on the landscape a short while and therefore it does not belong. On the contrary, its presence since the beginning of the late Holocene, before the influence of settlement, strengthens the case that our piñon-juniper woodlands are persistent. Since settlement, however, human influences have contributed to tree expansion (this condition is discussed in the segments on sagebrush communities in the assessment), tree density, and increased potential for large, stand-replacing crown fires (Gruell 1999). Human influences include a decrease in wildfire frequency along with increasing wildfire suppression efforts, the introduction of exotic annuals, and an increase in atmospheric CO 2 levels (Tausch 1999). To address persistent versus expansion piñon-juniper, a key (Romme 2007) will also be suggested as part of the assessment to address future piñon-juniper classifications. Romme, W., C. Allen, J. Bailey, W. Baker, B. Bestelmeyer, P. Brown, K. Eisenhart, L. Floyd-Hanna, D. Huffman, B. Jacobs, R. Miller, E. Muldavin, T. Swetnam, R. Tausch and P. Weisberg. 2007. Historical Modern Disturbance Regimes of Piñon-Juniper Vegetation in the Western U.S.
Anon Anon	Sportsmen have a clear stake in the management direction, strategy, and priorities that may derive from the Forest Plan revision process. We appreciate that the Forest Service has encouraged public involvement, through various meetings and interactive websites, to create a Forest Plan that reflects the interests of the forest users.	The Ashley National Forest posted the documents on the website as soon as they were available on June 30, 2017 then started hosting public meetings on July 11, 2017. We continued hosting meetings until July 26th which would have been three weeks after release. The total comment period was more than 45 days, actually 50 days. The purpose for the meeting timing was to get hardcopies in the hands of anyone that was interested and unable to access them on the website or anyone that attended the meetings and desired a hardcopy. In this case the documents were provided to the public as soon as they were available, outreach for these meetings was completed using contacts with local and regional media sources and through the internal communication of collaborating agencies that are participating in this planning effort. In outreaching for these meetings radio announcements ran in the Uintah Basin and in Wyoming. A legal notice was published in the Vernal Express the official paper of record for the Ashley National Forest and news releases were provided to a variety of other news agencies such as KSL and Deseret News in Salt Lake City, the Uintah Basin Standard in Roosevelt Utah, The Green River Star in Green River Wyoming and a host of other news outlets that included radio stations, television stations and newspapers and on our web and Facebook pages. The purpose of the meetings was to distribute the Draft Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest, not to actively seek feedback about the document from the public on the night of the meetings. It seems that the purpose of the meetings has been confused. The comment period for the Draft Assessment extended beyond the last meeting to provide time for the public to comment.
Trout Unlimited, Andy Rasmussen	We understand the revised Forest Plan will supersede the 1986 ANF Plan and any amendments. As participants during the 2012 Planning Rule process, we support the new Rule's goals for the Forest Plan revision, which include: * Maintain and, where appropriate, restore ecosystem and watershed health and resilience (ecological integrity), * Protect key resources in the Forest, including water, air, and soil, * Address water quality and riparian area protection and restoration.	We are definitely striving to meet the intent of the 2012 Planning Rule and look for opportunities to encourage multiple use.
Trout Unlimited, Andy Rasmussen	Our main areas of comment and concern at this stage are, 1) protecting the valuable coldwater watersheds, riparian ecosystems, and their resident native trout populations, and maintaining pristine water quality (surface and ground)	The Ashley National Forest welcomes public involvement throughout the Forest Plan revision process. A key function of the Forest Plan revision is to assess the current conditions and trends of Forest resources (including water quality, aquatic ecosystems and fisheries values), to identify needs for change in the existing Forest Plan, and develop a new Forest Plan based on identified needs for change.
Trout Unlimited, Andy Rasmussen	ensuring a robust, science-based discussion of the challenges presented by continuing climate change	More detailed discussion of potential climate change effects is contained in corresponding technical reports from which the Ashley National Forest Assessment Report is drawn. As an example for water resources, a discussion on climate change is found on pages 99-101 of the Draft Air, Soil, and Watershed Resources technical report. Potential climate change effects are also discussed in the Draft Aquatic Ecosystems Report in sections discussing drivers/stressors and condition and trend. Both documents draw from a recently published climate vulnerability analysis specific to the Ashley and the Uinta, Wasatch-Cache National Forests. Potential effects of climate change will also be analyzed in future stages of Forest Plan Revision.
Trout Unlimited, Andy Rasmussen	providing input in where and how oil and gas assets will be developed	The Ashley National Forest hopes to conduct a forest-wide oil and gas leasing analysis, to determine what lands should be made available for future oil and gas leasing, following completion of this forest planning effort. Current oil and gas developments are limited to those areas of the forest already under active oil and gas leases. We do not anticipate any new oil and gas leasing on the forest before a new oil and gas leasing analysis is prepared and available. Other mineral resources, such as leasing for phosphate, or exploration and development for locatable minerals, will be managed on a case-by-case basis, in accordance with existing laws and regulations, as specific proposals arise.
Trout Unlimited, Andy Rasmussen	Watershed conditions on the ANF are good to fair. It is notable and commendable that all of the watersheds in the ANF rate as good or fair, and that no watersheds were evaluated to be in poor condition. Trout Unlimited recommends continued and extensive monitoring to maintain the overall health of the resource.	The process of Forest Plan revision is designed to identify current ecosystem conditions and trends, compare condition and trend to current Forest Plan guidance, identify needs for change and develop a new Forest Plan based on identified needs for change. The Ashley Assessment report and associated Soil, Air and Watershed Resources technical report incorporate the US Forest Service watershed condition framework and its initial characterization for the Ashley National Forest, completed in 2011. Updates to the framework will continue to be used in Forest planning for prioritizing restoration projects and promoting watershed health. The Air, Soil and Watershed Resources technical report (page 89), explains that the framework characterizes watersheds at the 6 th level hydrologic unit code scale. Watersheds containing five percent or more of National Forest System lands were rated within the framework. For the Ashley National Forest, 107 of the 147 6 th level watersheds were characterized. Depictions of the watersheds and watershed area characterized in the framework are provided in Figures 41 - 50 in the appendix to the Air, Soil and Watershed Resources report. The area characterized in the 2011 Watershed Condition Framework represents approximately 99 percent of the Forest. Language will be added to the Draft Assessment report to clarify this.
Trout Unlimited, Andy Rasmussen	We would like to see a more thorough assessment of the groundwater situation, its larger role on the forest for stream connectivity, particularly given the character of groundwater in the ANF, with several sinking and disappearing streams, caves, sinkholes, and springs.	A more detailed discussion of groundwater resources is located on pages 80-83 of the Draft Air Soil and Watershed Resources technical report. A discussion of municipal watersheds and public drinking water sources is contained on pages 84-85 of this technical report. Additional maps and groundwater information will be incorporated into future stages of Forest Plan Revision.
Trout Unlimited, Andy Rasmussen	Continue to identify current watershed conditions, challenges and best management practices to protect these areas in the future. Again, TU recognizes the overall good health of ANF watersheds, but the planning process should include stipulations to keep them from impaired functioning in the future.	The process of Forest Plan revision is designed to identify current ecosystem conditions and trends, compare condition and trend to current Forest Plan guidance, identify needs for change and develop a new Forest Plan based on identified needs for change. The Ashley Assessment report and associated Soil, Air and Watershed Resources technical report incorporate the US Forest Service watershed condition framework and its initial characterization for the Ashley National Forest, completed in 2011. Updates to the framework will continue to be used in Forest planning for prioritizing restoration projects and promoting watershed health. The Air, Soil and Watershed Resources technical report (page 89), explains that the framework characterizes watersheds at the 6 th level hydrologic unit code scale. Watersheds containing five percent or more of National Forest System lands were rated within the framework. For the Ashley National Forest, 107 of the 147 6 th level watersheds were characterized. Depictions of the watersheds and watershed area characterized in the framework are provided in Figures 41 - 50 in the appendix to the Air, Soil and Watershed Resources report. The area characterized in the 2011 Watershed Condition Framework represents approximately 99 percent of the Forest. Language will be added to the Draft Assessment report to clarify this.
Trout Unlimited, Andy Rasmussen	Review current (and most likely outdated) stipulations which protect fish and wildlife resources and update accordingly. Increased stipulations for stream and river buffers should be applied especially in sensitive watersheds.	The process of Forest Plan revision will include this. A key function of the Forest Plan revision is to assess current conditions and trends of Forest resources (including aquatic resources), to identify needs for change in the existing Forest Plan, and develop a new Forest Plan based on identified needs for change.
Trout Unlimited, Andy Rasmussen	We support the use of the Forest's Watershed Condition Framework and its role in the plan revision. The tools identified within the Framework can be applied to new 2012 Forest Planning Rule concepts such as landscape level connectivity and watershed health. We encourage the ANF to provide a robust review and application of this option.	The process of Forest Plan revision is designed to identify current ecosystem conditions and trends, compare condition and trend to current Forest Plan guidance, identify needs for change and develop a new Forest Plan based on identified needs for change. The Ashley Assessment report and associated Soil, Air and Watershed Resources technical report incorporate the US Forest Service watershed condition framework and its initial characterization for the Ashley National Forest, completed in 2011. Updates to the framework will continue to be used in Forest planning for prioritizing restoration projects and promoting watershed health. The Air, Soil and Watershed Resources technical report (page 89), explains that the framework characterizes watersheds at the 6 th level hydrologic unit code scale. Watersheds containing five percent or more of National Forest System lands were rated within the framework. For the Ashley National Forest, 107 of the 147 6 th level watersheds were characterized. Depictions of the watersheds and watershed area characterized in the framework are provided in Figures 41 - 50 in the appendix to the Air, Soil and Watershed Resources report. The area characterized in the 2011 Watershed Condition Framework represents approximately 99 percent of the Forest. Language will be added to the Draft Assessment report to clarify this.
Trout Unlimited, Andy Rasmussen	Potential trans-basin diversions, from the Flaming Gorge Reservoir to the front range of Colorado, may impact reservoir levels and water supplies available to Lake Meade and Powell especially during drought years.	Incidence/discussion of existing transbasin diversions on the Ashley National Forest and their effects appears in the Air, Soil and Watershed Resources technical report. General discussion of projected future demands on water supply is also included in the Draft Assessment report and also appears in the Aquatic Ecosystems technical report. The operation of the Flaming Gorge Reservoir and the allotting of water rights associated with it are outside the jurisdiction of the Forest Service. Mention of specific diversion proposals from the Flaming Gorge Reservoir was not made as they remain uncertain/conjectural.
Trout Unlimited, Andy Rasmussen	Maintaining sufficient water supplies in Flaming Gorge Reservoir necessary to buffer the water supply needs of Flaming Gorge biological communities, recreational demands and downstream water commitments.	Incidence/discussion of existing transbasin diversions on the Ashley National Forest and their effects appears in the Air, Soil and Watershed Resources technical report. General discussion of projected future demands on water supply is also included in the Draft Assessment report and also appears in the Aquatic Ecosystems technical report. The operation of the Flaming Gorge Reservoir and the allotting of water rights associated with it are outside the jurisdiction of the Forest Service. Mention of specific diversion proposals from the Flaming Gorge Reservoir was not made as they remain uncertain/conjectural.
Trout Unlimited, Andy Rasmussen	Consideration of tributary salinity contributions to the Flaming Gorge and the Green River System and the need for salinity control projects on tributaries such as the Henry's Fork.	Incidence/discussion of existing transbasin diversions on the Ashley National Forest and their effects appears in the Air, Soil and Watershed Resources technical report. General discussion of projected future demands on water supply is also included in the Draft Assessment report and also appears in the Aquatic Ecosystems technical report. The operation of the Flaming Gorge Reservoir and the allotting of water rights associated with it are outside the jurisdiction of the Forest Service. Mention of specific diversion proposals from the Flaming Gorge Reservoir was not made as they remain uncertain/conjectural.
Trout Unlimited, Andy Rasmussen	* On page 33, within the list of management concerns related to wildlife habitat on the Ashley, add the following concern: Coordination between the State of Wyoming and the Wyoming Game and Fish Department is vitally important to ensure the welfare of Wyoming fisheries, wildlife and its habitat.	USFS agrees and to date have had some coordination already with Wyoming Game and Fish (WGF) and will have continued coordination with WGF department.
Trout Unlimited, Andy Rasmussen	We note that the Draft Assessment lists Colorado River Cutthroat Trout (CRCT) as a species at risk. While much of its habitat in the ANF is good, there are areas where erosion caused by overgrazing and unauthorized off-road vehicle use have impacted their habitat by adding sediment to streams. In addition the potential for habitat degradation from increased mineral development and climatic changes could significantly affect the long-term viability of CRCT throughout their historic range. Colorado River cutthroat trout (CRCT) are the only cutthroat trout species native to the Uinta Mountains and ANF. The CRCT historically occupied numerous tributary systems in the Uinta range. Today conservation populations of CRCT in Utah occupy approximately 20 percent of their historic habitat. Utah has the fewest conservation populations of CRCT, as indicated in the Range-wide multi-state assessment analysis completed in 2013. Trout Unlimited urges more robust consideration for maintaining areas currently supporting populations and will continue to partner with the ANF to identify additional opportunities to increase distribution of CRCT throughout their native range.	Yes, we are trying to maintain and expand the range of the this species which is the only native salmonid to the planning unit.

Trout Unlimited, Andy Rasmussen	We would recommend a full review and documentation of resources impacted by climate change, including water. Water is a resource and a commodity and is used, like timber, fuels, etc., by livestock industry, municipalities, recreationists, and of course fish and wildlife.	More detailed discussion of potential climate change effects is contained in corresponding technical reports from which the Ashley National Forest Assessment Report is drawn. As an example for water resources, a discussion on climate change is found on pages 99-101 of the Draft Air, Soil, and Watershed resources technical report. Potential climate change effects are also disclosed in the Draft Aquatic Ecosystems Report in sections discussing drivers/stressors and condition and trend. Both documents draw from a recently published climate vulnerability analysis specific to the Ashley and the Uinta, Wasatch-Cache National Forests. Potential effects of climate change will also be analyzed in future stages of Forest Plan Revision.
Trout Unlimited, Andy Rasmussen	Include a discussion with management options for dealing with the water (and groundwater resources) management challenges mentioned in the Draft Assessment. These options should bring new and traditional stakeholders to the table in helping to incorporate better water resource management. The use of volunteers, nonprofit organizations, citizen science use, and land users to help improve landscape and watershed health should be a top priority, especially in times of stressed budgets and lack of staff.	The Forest Service values collaboration with non-federal organizations and volunteer groups. The Ashley National Forest currently benefits from collaboration with outside agencies and groups, and will continue to look for opportunities in the future
Trout Unlimited, Andy Rasmussen	Trout Unlimited feels privileged to be partners with the Forest Service through volunteer and citizen science projects. We believe these grassroots collaborations are the heart and soul of our organization and they are in no short supply on national forests in Utah. Under the plan revision process, we recommend the prioritization of citizen science contributions, but also for an internal monitoring and feedback structure that provides accountability and continuity for understanding the data obtained through the volunteer citizen science program. We want to be sure that the work contributed through the citizen science program is valuable, useable, and provides an opportunity to critique the process of those contributions.	The Forest Service values collaboration with non-federal organizations and volunteer groups. The Ashley National Forest currently benefits from collaboration with outside agencies and groups, and will continue to look for opportunities in the future
Trout Unlimited, Andy Rasmussen	The Draft Assessment only briefly mentions impacts to particularly vulnerable aquatic habitats and fisheries. Our own research has illustrated ways in which providing a diverse portfolio of management approaches may lower the risk of habitat loss, and in the case of our interests in coldwater fisheries, ensure that long term persistence of native trout are maintained.1 TU strongly urges a robust climate change review and would like this strong discussion to continue in the plan revision process, with opportunities provided which address lowering these risks.	More detailed discussion of potential climate change effects is contained in corresponding technical reports from which the Ashley National Forest Assessment Report is drawn. As an example for water resources, a discussion on climate change is found on pages 99-101 of the Draft Air, Soil, and Watershed resources technical report. Potential climate change effects are also disclosed in the Draft Aquatic Ecosystems Report in sections discussing drivers/stressors and condition and trend. Both documents draw from a recently published climate vulnerability analysis specific to the Ashley and the Uinta, Wasatch-Cache National Forests. Potential effects of climate change will also be analyzed in future stages of Forest Plan Revision.
Trout Unlimited, Andy Rasmussen	The Draft Assessment provides limited information relating to climate change impacts on the forest and region. Brief discussions of climate change impacts in each of the ecosystem subsections leave considerable gaps in both data and analysis. While the Assessment would benefit from a more vigorous treatment of climatological science and the impacts of potential climate change on ANF resources, a gap of primary importance to TU is related to water: stream temperatures, community water needs and greenhouse gas levels. All impact water and watershed health to some degree. There is enough science on watershed protections and climate change adaptation tools available now that can help modify the dire trends we are seeing. Additionally, increasing temperatures, drought, and fuel loads will continue to present management challenges not only for watersheds, but for ANF vegetation. This may incur catastrophic costs as more trees are killed by insects and disease and the risk of large, uncharacteristic fires increases.	More detailed discussion of potential climate change effects is contained in corresponding technical reports from which the Ashley National Forest Assessment Report is drawn. As an example for water resources, a discussion on climate change is found on pages 99-101 of the Draft Air, Soil, and Watershed resources technical report. Potential climate change effects are also disclosed in the Draft Aquatic Ecosystems Report in sections discussing drivers/stressors and condition and trend. Both documents draw from a recently published climate vulnerability analysis specific to the Ashley and the Uinta, Wasatch-Cache National Forests. Potential effects of climate change will also be analyzed in future stages of Forest Plan Revision.
Trout Unlimited, Andy Rasmussen	Trout Unlimited is disappointed to see the lack of mineral exploration directives reflected in the ANF Draft Assessment. The DA repeatedly states that management of mineral resources is "guided and bounded" by laws, regulations, agencies, and market forces external to ANF and its planning process. The primary statement of mineral management intent in the DA seems to be, "Until an updated oil and gas leasing analysis for the Ashley is available, that guidance (established in the 1997 Western Uintah Basin Oil and Gas Leasing EIS) will continue to be followed."2 TU encourages a much more comprehensive suitability analysis, including directives that make it clear in the plan how energy and mineral development will be accessed and managed.	The Ashley National Forest hopes to conduct a forest-wide oil and gas leasing analysis, to determine what lands should be made available for future oil and gas leasing, following completion of this forest planning effort. Current oil and gas developments are limited to those areas of the forest already under active oil and gas leases. We do not anticipate any new oil and gas leasing on the forest before a new oil and gas leasing analysis is prepared and available. Other mineral resources, such as leasing for phosphate, or exploration and development for locatable minerals, will be managed on a case-by-case basis, in accordance with existing laws and regulations, as specific proposals arise.
Trout Unlimited, Andy Rasmussen	Of particular concern are the numerous oil and gas leases on the Duchesne-Roosevelt South unit and the large suspected oil shale deposits within the Green River Formation in the Flaming Gorge District. The existing Ashley National Forest Plan has classified the national forest lands within the Flaming Gorge National Recreation Area as unavailable for oil and gas development. Because the importance of the Flaming Gorge to big game and other wildlife, Trout Unlimited request that the public lands within the National Recreation Area remain available to oil and gas development.	The Flaming Gorge National Recreation Area is not currently available for new federal oil and gas or oil shale leasing. We do not expect that status to change in the near future, or to occur without preparation of a formal oil and gas or oil shale leasing analysis beforehand.
Trout Unlimited, Andy Rasmussen	Under the 2012 Planning Rule, land management decisions regarding oil and gas suitability and leasing availability analysis can be made concurrently as part of the plan development.3 The Forest clarified under the Rule the relationship between oil and gas leasing decisions and the land management planning process by stating: The relationship between oil and gas leasing analysis and the land management planning was modified from the proposed directive in FSH 1909.12, chapter 20, section 23.23i. The Forest Service decision regarding which lands are available for oil and gas leasing is supported through preparation of a leasing availability analysis. A leasing analysis may be for all or portions of a plan area. The leasing availability decision may be as part of the plan, as a separate decision concurrently with the plan, or as a decision that may occur subsequent to the plan decision. The difference in scope, proposed action, and level of detail between a planning effort and a leasing analysis must be made clear should a single NEPA analysis document be used to support both the plan and oil and gas leasing availability decisions. Oil and gas leasing availability decisions must be consistent with the applicable land management plan. http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3828565.pdf see page 59. With the variety of hard rock and mineral development occurring and potentially occurring on this Forest, it becomes increasingly important to provide a thorough analysis, including an updated reasonably foreseeable development scenario. A concurrent increase in water demand, recreation demand, and other multiple users who are also livestock operators, means providing a well-designed leasing and development plan clearly directs future forest use.	The Ashley National Forest hopes to conduct a forest-wide oil and gas leasing analysis, to determine what lands should be made available for future oil and gas leasing, following completion of this forest planning effort. Current oil and gas developments are limited to those areas of the forest already under active oil and gas leases. We do not anticipate any new oil and gas leasing on the forest before a new oil and gas leasing analysis is prepared and available. Other mineral resources, such as leasing for phosphate, or exploration and development for locatable minerals, will be managed on a case-by-case basis, in accordance with existing laws and regulations, as specific proposals arise.
Trout Unlimited, Andy Rasmussen	Due to the increase in oil and gas development across the West in the past 20 years, much research has been undertaken to determine the level of impacts associated with energy development. We encourage the ANF to review available research and new management options for protecting and minimizing impacts to fish, wildlife, air, and water resources. [...] Trout Unlimited is committed to working with agencies and even energy developers to find ways to support oil and gas development in a way that protects hunting and fishing resources, water quality, and long-term sustainability of the delicate ecosystems of the ANF. Such development follows several good precautionary measures, design criteria, mitigation measures, and Best Management Plans to mitigate potential negative environmental impacts.	The purpose of the assessment is to identify risk and threats to various resources. As we get further into the planning process we will look at mitigations, design criteria, cumulative impacts, etc.,
Trout Unlimited, Andy Rasmussen	On page 103 of the Draft Assessment, in the Land Status, Ownership, Access, and Uses section, under the Utility Corridors or Rights-of-Way sections: to help protect the Flaming Gorge from potential water pollution, TU strongly recommends adding language that would protect the world class fisheries in Flaming Gorge and that would prohibit pipeline corridors or rights-of-way within the Flaming Gorge National Recreation Area (FGNRA). The risks of leakage and spillage inherent with pipelines would create an untenable threat to the Flaming Gorge fishery and downstream ecosystems and users. TU is ready to work with the various stakeholder in identifying alternate pipeline corridors and rights-of-way.	A statement has been added to the final working draft of the assessment that clarifies this.
Trout Unlimited, Andy Rasmussen	Regarding both the motorized and non-motorized dispersed recreation referenced on page 60 of the Draft Assessment: since both of these recreation types rely on roads, trails and two tracks that cross adjacent public and private lands, it is important that the report make a reference to the necessity of coordinating roadway maintenance and access with both private and public land owners. This may also help reduce unauthorized off-road vehicle use.	The Infrastructure Technical Report references coordination between the Ashley National Forest and counties for road maintenance. The Ashley National Forest works with private land owners that are adjacent to the forest boundary on a case by case basis as the need arises.
Trout Unlimited, Andy Rasmussen	Under the Conclusions and Future Considerations section, the Draft Assessment states: "Based on current economic modeling and social input, the Ashley National Forest represents a minor contribution to the local economic and social stability in the region overall; though contributions at the community level may be more significant." TU disagrees with this statement. There is a need for an economic study that contains a more thorough economic and social analysis of the importance and contribution of the Flaming Gorge National Recreation Area to the Ashley National Forest, southwest Wyoming, and Utah.	The Assessment report is intended to be a rapid analysis of existing available information (see Forest Service Handbook 1909.12 - Land Management Planning Handbook, Chapter 10). This assessment includes the social and economic contributions from the activities in the planning area, including those occurring on NFS lands in the Flaming Gorge National Recreation Area (NRA). The National Visitor Use Monitoring data used to estimate economic contributions is for the Ashley NF as a whole, which captures contributions from the Flaming Forge NRA. Additional analysis of specific contributions from the NRA will be explored for the baseline information and impacts analysis completed for NEPA process as appropriate.
Anon Anon	I think it is a shame that the Forest has not involved the Ute Tribe in land planning decisions under the 1986 forest plan in subsequent land management decisions. There needs to be a huge shift in perspective for the new Forest Land Management Plan. The Ute Tribe should have a seat at the table regarding land use planning in the same way that county and state governments do. I recommend that your Forest plan outline the process of how you will involve the Ute Tribe in future planning and projects. Every aspect of the land management plan should address their involvement, including ecosystem management. Management of vegetation and wildlife within "Indian Country" should involve the Ute tribe to at least the extent that the Utah Division of Wildlife Resources is consulted and coordinated regarding projects and plans. The Ute Tribe has a fish and game department. Are they involved at the same level as the State DWR? They should be within "Indian Country."	The Tribal uses section of the report agrees with this comment. [Jeff Rust] [Ecosystem and Wildlife response also needed for the comment] We have already reached out to coordinate with the Ute Tribe and will continue to do so throughout the process. (Dan Abeyta)
Anon Anon	I think it is crucial to indicate in the Assessment report that the Forest Service does not actually manage any of the terrestrial or aquatic wildlife species on the Forest. All animals on Forest Service lands are managed (owned) by the State of Utah (or the Ute Tribe in Indian Country). The Forest Service only manages (owns) the habitat. So regardless of any management planning by the Forest Service for any terrestrial or aquatic wildlife species, the factor that has the greatest effect on those species will be state management decisions. The Forest Service can protect as much habitat as it wants, but the number of state issued hunting, trapping, or fishing permits will have a greater effect by far on any given species. This fact should at least be acknowledged in the Terrestrial Wildlife and Aquatic sections of the assessment report.	Impacts to wildlife from hunting are beyond the control of the Forest Service and this assessment. The Forest Service primarily ensures that habitat is protected and sustainable for various species, including those that are hunted.
Wyoming Department of Agriculture	Page: 21 Text: "Although disturbances like timber harvest, livestock grazing, and avalanches could occur, none of the Ashley fens has been severely impacted by these stressor." Comment: "Stressors" implies only negative influence when any of the mentioned uses or events could have positive impacts as well. Also, livestock grazing is not "disturbance". We suggest changing "stressors" to "inputs" and change "disturbances" to "uses" and remove "avalanches".	"Streambanks banks" typo is noted and corrected from line four of the Riparian Areas and Wetlands section (page 21 of the draft assessment report). The term stressors will remain in the passage on fens in the Draft Assessment as the term is inherent to current Forest Handbook guidance. The term "avalanches" will remain, as avalanches are a potential source of disturbance to fens in steep-walled glacial canyons of the Forest. Current Forest Service Handbook direction for the content and structure of assessments in Forest Plan revision requires consideration of "drivers" and "stressors" when analyzing the status of ecosystems and their trend (FSH 1909.12 -10 Land Management Handbook, Chapter 10 Assessments, section 12.1). Forest Service Handbook guidelines follow planning requirements set in 36 CFR 219.6 for the content of assessments. In section 36 CFR 219.6(i)(3) of this federal code, assessments shall consider system drivers, including dominant ecological processes, disturbance regimes, and system stressors, such as natural succession, wildland fire, invasive species, and climate change; and the ability of terrestrial and aquatic ecosystems in the plan area to adapt to change. In section 12.14c.2 of this Forest Service Handbook, when determining the existing condition of riparian and aquatic ecosystems, Interdisciplinary Teams may consider describing stressors such as changes in flow regime and dewatering, channelization, invasive species, changes in sediment delivery to channels, herbivory, wildfire and fuel buildup, changes to water quality due to pollutants and sediment buildup.
Wyoming Department of Agriculture, Justin Williams	Page: 35 Text: "and possible degradation from grazing/mining." Comment: Not all grazing is detrimental to bird habitat. Please change to read: "and possible degradation from improper grazing or mining."	Suggested edits made in the assessment.
Wyoming Department of Agriculture, Justin Williams	Page: 36 Text: "considered to be in decline due to a multitude of reasons, including habitat loss." Comment: Sage-grouse may be declining in certain portions of the range but this is not the case for the species as a whole. Either add "in certain portions of its range" after "declined" or be specific to the Ashley NF region.	The wording was changed in the Assessment to state the species "has declined throughout much of its range". This range-wide decline is well documented. Supporting literature was thoroughly evaluated in the 2015 Sage-Grouse Amendment to the 1986 Ashley Forest Plan and was also considered during the process for evaluating potential SOCC. The word "locations" refers to any place where sage-grouse were observed or coordinate data was collected via telemetry or GPS. These locations are inclusive of nesting, brooding, lekking, wintering, or summer as numerous locations of each have been documented on the Ashley NF. These data were collected by the USFS, Utah Division of Wildlife Resources, and Wyoming Game and Fish Department and were reviewed during the evaluation process in considering sage-grouse as potential SOCC for the Ashley NF.
Wyoming Department of Agriculture, Justin Williams	Page: 36 Text: "There are numerous location of greater sage-grouse on the Ashley National Forest." Comment: We are unclear as to what "locations" means. Leks? Nest sites? Potential habitat? Please clarify with Wyoming Game and Fish and Utah Dept. of Wildlife data.	The wording was changed in the Assessment to state the species "has declined throughout much of its range". This range-wide decline is well documented. Supporting literature was thoroughly evaluated in the 2015 Sage-Grouse Amendment to the 1986 Ashley Forest Plan and was also considered during the process for evaluating potential SOCC. The word "locations" refers to any place where sage-grouse were observed or coordinate data was collected via telemetry or GPS. These locations are inclusive of nesting, brooding, lekking, wintering, or summer as numerous locations of each have been documented on the Ashley NF. These data were collected by the USFS, Utah Division of Wildlife Resources, and Wyoming Game and Fish Department and were reviewed during the evaluation process in considering sage-grouse as potential SOCC for the Ashley NF.
Wyoming Department of Agriculture, Justin Williams	Page: 73 Text: "The approximate labor income for grazing is \$2.78 million." Comment: This figure seems extremely high for labor income. Please provide a source for this number.	Estimates of current economic contributions from livestock grazing on the Ashley National Forest are based on best available information about current land uses (including permitted livestock grazing numbers and relevant livestock budget data) input into IMPLAN input-output modeling software to provide a summary of overall economic impacts. As noted in the socioeconomic report (Section 1.2, p 1-3) and discussed in detail in the Economic Environment specialist report, IMPLAN produces information on the total economic impacts, which includes direct, indirect, and induced impacts. Based on actual use, up to 127 jobs and \$2.8 million in labor income in Daggett, Duchesne, Uintah, and Sweetwater Counties would be directly or indirectly supported by grazing on the Ashley National Forest. This is based on 2015 authorized use estimated at 39,735 HM (51,666 AUM) cattle and horses and 12,056 HM (3,331 AUM) sheep and goats. Grazing contributes jobs and income from the direct work, but also causes spending to support the work (e.g. feedstock, machinery) and income received is spent by workers in the local economies on other goods and services (e.g. grocery, clothes). Total 2014 total employment in the analysis area was about 65,000 jobs and \$4 billion in labor income. The economic contributions from FS activities on the Ashley NF, including from grazing, are less than 1% of the total employment in the area. Therefore, the grazing contributions are not high when compared to the economic conditions in the analysis area.
Wyoming Department of Agriculture, Justin Williams	Page: 71 Text: Entire paragraph Comment: Many of the customs and cultures of the West are derived from agriculture and this is recognized in portions of the Assessment. However, this section is entirely silent on the cultural importance of agriculture to the region and local communities. Please add information on the Cultural Services associated with agriculture to this section including the provision of open space.	The Ashley National Forest recognizes the social and cultural importance of livestock grazing. Additional language has been added to the cultural services discussion presented in the Draft Assessment, page 71, to note these contributions.
Wyoming Department of Agriculture, Justin Williams	Page: 75 Text: Table 2. Comment: We again question the figures for Grazing in Table 2. When compared to Recreation and Timber we fail to understand how this number is so different. Even when combining Wildlife and Fish Recreation with Recreation (total of \$1,943,000) and comparing to Grazing the amount is nearly double. Please provide more information for this number and explain how it was derived.	Estimates of current economic contributions from livestock grazing on the Ashley National Forest are based on best available information about current land uses (including permitted livestock grazing numbers and relevant livestock budget data) input into IMPLAN input-output modeling software to provide a summary of overall economic impacts. As noted in the socioeconomic report (Section 1.2, p 1-3) and discussed in detail in the Economic Environment specialist report, IMPLAN produces information on the total economic impacts, which includes direct, indirect, and induced impacts. Based on actual use, up to 127 jobs and \$2.8 million in labor income in Daggett, Duchesne, Uintah, and Sweetwater Counties would be directly or indirectly supported by grazing on the Ashley National Forest. This is based on 2015 authorized use estimated at 39,735 HM (51,666 AUM) cattle and horses and 12,056 HM (3,331 AUM) sheep and goats. Grazing contributes jobs and income from the direct work, but also causes spending to support the work (e.g. feedstock, machinery) and income received is spent by workers in the local economies on other goods and services (e.g. grocery, clothes). Total 2014 total employment in the analysis area was about 65,000 jobs and \$4 billion in labor income. The economic contributions from FS activities on the Ashley NF, including from grazing, are less than 1% of the total employment in the area. Therefore, the grazing contributions are not high when compared to the economic conditions in the analysis area.
Wyoming Department of Agriculture, Justin Williams	Page: 76 Text: "Although it is no longer one of the major economic contributors in the area, ranching families maintain deep connections to the lands in and around the national forest, and strongly value use of the land as part of their heritage" Comment: We believe this language, or similar, would be well suited for the "Cultural Services" section as mentioned above in Comment 7.	The Ashley National Forest recognizes the social and cultural importance of livestock grazing. Additional language has been added to the cultural services discussion presented in the Draft Assessment, page 71, to note these contributions.
Wyoming Department of Agriculture, Justin Williams	Page: 78 Text: "grazing levels since 1980 have slightly declined." Comment: We would request the FS put in an actual percentage of decline in AUMs. Please replace with: "grazing levels since 1980 have slightly declined (approximately 1%)." Page: 78 Text: Table 3: "Total: 70,096" Comment: By our calculation this number should be 70,772. (13,695+23,199+11,267+22,111-70,772) .911 appears to be correct when the total is 70,772.	Data have been corrected to show the total AUMs as 70,772. As noted in the footnote to Table 3, Draft assessment p 78, AUM data are variable. The AUM Data provided in the table represents levels in the database at the time information was viewed. Text has been modified to include that an approximate one percent change in overall permitted grazing has occurred. As noted in the draft assessment (p 78), there are a number of factors that could impact the gap between permitted and authorized grazing and achieving full use of the grazing availability, such as level and timing of precipitation. Project area specific information for this issue was not readily available at the assessment stage but the EIS may consider potential causes of this gap if it is related to the proposed action. Livestock numbers and season of use are managed at the allotment level based on long-term resource monitoring. Neither the assessment nor the revised forest plan will determine AUMs or the stocking level on an allotment.
Wyoming Department of Agriculture, Justin Williams	Page: 78 Text: "If all permitted head months were grazed, it would support 162 jobs and \$3.5 million in labor income annually." Comment: Again, we question these numbers and would ask the FS to provide more insight on how they were derived. Please see Comments 8, 9, 10.	Estimates of current economic contributions from livestock grazing on the Ashley National Forest are based on best available information about current land uses (including permitted livestock grazing numbers and relevant livestock budget data) input into IMPLAN input-output modeling software to provide a summary of overall economic impacts. As noted in the socioeconomic report (Section 1.2, p 1-3) and discussed in detail in the Economic Environment specialist report, IMPLAN produces information on the total economic impacts, which includes direct, indirect, and induced impacts. Based on actual use, up to 127 jobs and \$2.8 million in labor income in Daggett, Duchesne, Uintah, and Sweetwater Counties would be directly or indirectly supported by grazing on the Ashley National Forest. This is based on 2015 authorized use estimated at 39,735 HM (51,666 AUM) cattle and horses and 12,056 HM (3,331 AUM) sheep and goats. Grazing contributes jobs and income from the direct work, but also causes spending to support the work (e.g. feedstock, machinery) and income received is spent by workers in the local economies on other goods and services (e.g. grocery, clothes). Total 2014 total employment in the analysis area was about 65,000 jobs and \$4 billion in labor income. The economic contributions from FS activities on the Ashley NF, including from grazing, are less than 1% of the total employment in the area. Therefore, the grazing contributions are not high when compared to the economic conditions in the analysis area.
Wyoming Department of Agriculture, Justin Williams	Page: 76 Text: "In 1905, Forest Supervisor William Anderson established some of the first grazing allotments on the land of the Ashley National Forest to begin managing grazing in the national forest, but more sustainably." Comment: We do not feel "but more sustainably" is necessary given the preceding information regarding the turn of the 20th century. Please remove this portion of the sentence.	The missing maps were not included in the Draft Assessment Report. The reference to the maps was an error and will be removed. The maps can be found in the Socioeconomic Technical Report under the Range Resources section. In the statement on page 76, "In 1905, Forest Supervisor William Anderson established some of the first grazing allotments on the land of the Ashley National Forest to begin managing grazing in the national forest, but more sustainably" the phrase, "but more sustainably" will be removed because this point is described in first sentence of the paragraph. On page 71 under "Providing Services" and agriculture" was added to the second sentence in the paragraph. On page 42 the sentence, "Overgrazing of lands across the West at the turn of the 20th century was the catalyst for the Forest Service to begin regulating grazing on the national forests" was added after the sentence "By the early 1900s, forest rangers became concerned about overgrazing, especially as they noted degradation of the range and damaged watersheds."
Wyoming Department of Agriculture, Justin Williams	As a second point, we would ask how - if "no longer one of the major economic contributors in the area" - the numbers mentioned above in Comment 8 and 9 are so high.	Estimates of current economic contributions from livestock grazing on the Ashley National Forest are based on best available information about current land uses (including permitted livestock grazing numbers and relevant livestock budget data) input into IMPLAN input-output modeling software to provide a summary of overall economic impacts. As noted in the socioeconomic report (Section 1.2, p 1-3) and discussed in detail in the Economic Environment specialist report, IMPLAN produces information on the total economic impacts, which includes direct, indirect, and induced impacts. Based on actual use, up to 127 jobs and \$2.8 million in labor income in Daggett, Duchesne, Uintah, and Sweetwater Counties would be directly or indirectly supported by grazing on the Ashley National Forest. This is based on 2015 authorized use estimated at 39,735 HM (51,666 AUM) cattle and horses and 12,056 HM (3,331 AUM) sheep and goats. Grazing contributes jobs and income from the direct work, but also causes spending to support the work (e.g. feedstock, machinery) and income received is spent by workers in the local economies on other goods and services (e.g. grocery, clothes). Total 2014 total employment in the analysis area was about 65,000 jobs and \$4 billion in labor income. The economic contributions from FS activities on the Ashley NF, including from grazing, are less than 1% of the total employment in the area. Therefore, the grazing contributions are not high when compared to the economic conditions in the analysis area.
Wyoming Department of Agriculture, Justin Williams	Page: 79 Text: "Fire, where it occurs has affected some sagebrush habitat." Comment: Please add information regarding changes in forage (potential short-term decrease, long term increase) following fire.	On page 79 the sentence was modified to, "Fire, where it occurs, decreases forage in the short-term but has generally increased forage in the long-term."
Wyoming Department of Agriculture, Justin Williams	Page: 71 Text: "On the Ashley National Forest, key provisioning services including animal products from hunting and fishing." Comment: Agriculture provides numerous "animal products" and should be included. Please add "and agriculture" at the end of this sentence.	The missing maps were not included in the Draft Assessment Report. The reference to the maps was an error and will be removed. The maps can be found in the Socioeconomic Technical Report under the Range Resources section. In the statement on page 76, "In 1905, Forest Supervisor William Anderson established some of the first grazing allotments on the land of the Ashley National Forest to begin managing grazing in the national forest, but more sustainably" the phrase, "but more sustainably" will be removed because this point is described in first sentence of the paragraph. On page 71 under "Providing Services" and agriculture" was added to the second sentence in the paragraph. On page 42 the sentence, "Overgrazing of lands across the West at the turn of the 20th century was the catalyst for the Forest Service to begin regulating grazing on the national forests" was added after the sentence "By the early 1900s, forest rangers became concerned about overgrazing, especially as they noted degradation of the range and damaged watersheds."
Wyoming Department of Agriculture, Justin Williams	Page: 42 Text: "By the early 1900s, forest rangers became concerned about overgrazing, especially as they noted degradation of the range and damaged watersheds." Comment: While we recognize past grazing practices were not what we would consider "best" nowadays, the FS should provide a reference for such statements. Additionally, changes in the way the FS approach logging have been made yet there is no reference within the Logging and Timber Production section to past concerns FS staff. We suggest this sentence be removed or replaced with language from page 76 which states: "Overgrazing of lands across the West at the turn of the 20th century was the catalyst for the Forest Service to begin regulating grazing on the national forests."	The missing maps were not included in the Draft Assessment Report. The reference to the maps was an error and will be removed. The maps can be found in the Socioeconomic Technical Report under the Range Resources section. In the statement on page 76, "In 1905, Forest Supervisor William Anderson established some of the first grazing allotments on the land of the Ashley National Forest to begin managing grazing in the national forest, but more sustainably" the phrase, "but more sustainably" will be removed because this point is described in first sentence of the paragraph. On page 71 under "Providing Services" and agriculture" was added to the second sentence in the paragraph. On page 42 the sentence, "Overgrazing of lands across the West at the turn of the 20th century was the catalyst for the Forest Service to begin regulating grazing on the national forests" was added after the sentence "By the early 1900s, forest rangers became concerned about overgrazing, especially as they noted degradation of the range and damaged watersheds."
Wyoming Game and Fish Department, Meghan Lockwood	Throughout Ashley National Forest Assessment Report, but especially in the Terrestrial Wildlife Species and Habitat, there is a lack of information and recognition of terrestrial wildlife and aquatic species that occur in Wyoming.	More detailed information and analysis on plants and animals is found in the technical reports as well as the supporting individual species assessments.
Wyoming Game and Fish Department, Meghan Lockwood	The Assessment Report has not adequately addressed the biological, economic and social importance of the Flaming Gorge National Recreation Area (NRA) not only to the economy of the Ashley National Forest, but also to the economy of Southwest Wyoming and the State of Wyoming.	The Assessment report is intended to be a rapid analysis of existing available information (see Forest Service Handbook 1909.12 - Land Management Planning Handbook, Chapter 10). This assessment includes the social and economic contributions from the activities in the planning area, including those occurring on NFS lands in the Flaming Gorge National Recreation Area (NRA). The National Visitor Use Monitoring data used to estimate economic contributions is for the Ashley NF as a whole, which captures contributions from the Flaming Forge NRA. Additional analysis of specific contributions from the NRA will be explored for the baseline information and impacts analysis completed for NEPA process as appropriate.
Wyoming Game and Fish Department, Meghan Lockwood	Mule Deer (pg. 37) No mention of mule deer occurrence and management with the Flaming Gorge NRA.	The assessment discusses wildlife such as mule deer at the Forest scale (planning unit scale), which includes the mule deer management unit that overlaps the Flaming Gorge NRA. In addition to the NRA, mule deer also occur within five other management units that overlap the Ashley NF. The population trend for mule deer were evaluated within all these units that overlap the Ashley NF, including the unit that overlaps the Flaming Gorge NRA, and there appears to be an upward trend in most of these units.
Wyoming Game and Fish Department, Meghan Lockwood	We disagree with the last sentence "Most recent trends for mule deer populations on the Ashley National Forest have been upwards." Mule deer populations within the Flaming Gorge NRA and surrounding areas have been declining for the last 10-15 years. The Department along with several partners has initiated a collaring study trying to determine the cause of this decline.	The assessment discusses wildlife such as mule deer at the Forest scale (planning unit scale), which includes the mule deer management unit that overlaps the Flaming Gorge NRA. In addition to the NRA, mule deer also occur within five other management units that overlap the Ashley NF. The population trend for mule deer were evaluated within all these units that overlap the Ashley NF, including the unit that overlaps the Flaming Gorge NRA, and there appears to be an upward trend in most of these units.
Wyoming Game and Fish Department, Meghan Lockwood	Rocky Mountain Elk (pg. 38) No mention of elk occurrence and management within the Flaming Gorge NRA.	The Assessment addresses elk at the Forest scale (planning unit scale), which includes the Flaming Gorge NRA. A sentence was added in the Assessment to acknowledge that elk may occur on the Wyoming side of the NRA.
Wyoming Game and Fish Department, Meghan Lockwood	Rocky Mountain Bighorn Sheep (pg. 38) No mention of bighorn sheep occurrence and management within the Flaming Gorge NRA.	This is the assessment phase of Forest Plan Revision. Specific components, if needed, relating to management of bighorn sheep would be addressed in the next phase of the Forest Plan Revision process. A sentence was added to the assessment to acknowledge that bighorn sheep from the Uintas may travel into Wyoming. Because of regional concerns, and populations declines on the planning unit, bighorn sheep were reconsidered and included as a potential species of conservation concern for the Ashley National Forest.
Wyoming Game and Fish Department, Meghan Lockwood	We strongly recommend that the following language be added to the Assessment Report. Bighorn sheep that occur within the State of Wyoming will be managed in accordance with the recommendations of the statewide Bighorn/Domestic Sheep Interaction Report.	This is the assessment phase of Forest Plan Revision. Specific components, if needed, relating to management of bighorn sheep would be addressed in the next phase of the Forest Plan Revision process. A sentence was added to the assessment to acknowledge that bighorn sheep from the Uintas may travel into Wyoming. Because of regional concerns, and populations declines on the planning unit, bighorn sheep were reconsidered and included as a potential species of conservation concern for the Ashley National Forest.

Wyoming Game and Fish Department, Meghan Lockwood	We recommend that the midget faded rattlesnake (<i>Crotalus oreganus concolor</i>) be added to the "Potential wildlife and fish species of conservation concern located on the Ashley National Forest" list. We recommend gathering and providing additional information for the EIS phase of the forest plan revision process, including quantitative data and maps as appropriate. For the following issues [see the sections below for additional detail]: * A map and summary of planning area waters, including rivers, streams, tributaries, lakes, springs and wetlands. It would be helpful if the summary identified high resource value water bodies and their designated beneficial uses (e.g., agriculture, fisheries, drinking water, recreation);	The midget faded rattlesnake was considered and evaluated. Upon evaluation it was found that this species did not meet the criteria for SOCC, thus it is not on the list for potential SOCC for the Ashley NF. However, this comment will be considered in development of the final list of SOCC.
U.S. EPA Region 8, Ethan Aumann	Surface water information, including available water quality data in relation to current standards, stream functional assessments, stream channel and stream bank stability conditions, sediment loads and aquatic life;	Newly updated (and EPA approved) State beneficial use designations and 303(d) listings will be incorporated into future stages of Forest Plan revision.
U.S. EPA Region 8, Ethan Aumann	Types, functions and acreage of wetlands, riparian areas, and springs;	The Ashley National Forest Assessment Report summarizes information found in companion technical reports. In the Air, Soil and Watershed Resources report are maps and acreages of likely palustrine emergent bed wetlands, derived from the National Wetlands Inventory. Examples of this wetland type include marshes, fens, pothole ponds and wet meadows. A summary of mapped springs on the Forest is also available in this technical report. The Aquatic Ecosystems technical report contains discussion on the 165 springs and fens surveyed using US Forest Service monitoring protocols. In the Rare Habitat Type section of the Terrestrial Ecosystems report is further discussion on known calcareous fens, glacial canyon fens, and limestone fens on the Forest. A recently updated map layer of the National Wetlands Inventory, depicting potential and probable fen habitat, will be incorporated into future stages of Forest Plan Revision.
U.S. EPA Region 8, Ethan Aumann	Available groundwater information, including quality and location of aquifers	A more detailed discussion of groundwater resources is located on pages 80-83 of the Draft Air Soil and Watershed Resources technical report. A discussion of municipal watersheds and public drinking water sources is contained on pages 84-85 of this technical report. Additional maps and groundwater information will be incorporated into future stages of Forest Plan Revision.
U.S. EPA Region 8, Ethan Aumann	Using the most recent EPA-approved lists, a map of water body segments classified by the Utah Department of Environmental Quality (UDEQ) or the Wyoming Department of Environmental Quality (WDEQ) as water quality impaired or threatened under the Clean Water Act (CWA) Section 303(d); water bodies considered not impaired by each respective state; and water bodies that have not yet been assessed by the states for impairment status. We also recommend that a table be provided to identify the designated uses of water bodies and the specific pollutants of concern, where applicable. The UDEQ and WDEQ can identify and validate any CWA Section 303(d) listed waterbodies in the planning area. As of the date of these comments, the most recent EPA-approved 303(d) lists for Utah and Wyoming are dated 2014.	Newly updated (and EPA approved) State beneficial use designations and 303(d) listings will be incorporated into future stages of Forest Plan revision.
U.S. EPA Region 8, Ethan Aumann	We recommend the Draft Assessment Report provide a summary of available information and monitoring data on water quality for the planning area, including parameters such as total nitrogen, total phosphorus, total suspended solids, temperature and those of interest for impaired waterbodies within and downstream of the planning area. Identification of any significant gaps in data may be helpful in developing monitoring plans. If this information is not available at this time, we recommend gathering such data for the EIS phase of the forest plan revision process.	Newly updated (and EPA approved) State beneficial use designations and 303(d) listings will be incorporated into future stages of Forest Plan revision.
U.S. EPA Region 8, Ethan Aumann	We recommend providing a map of fragile soils, such as those with elevated levels of salinity or selenium and those prone to erosion, in the planning area. Because sediment loading may already be a concern and future USFS-authorized activities could result in new surface disturbance that may enable erosion, it is important to provide baseline information about this issue.	The Assessment Report for the Ashley National Forest summarized existing information. The Forest Plan Revision EIS will provide additional information on soil vulnerability that will include a review of soil erosion and related factors, including unstable parent materials, carbonates and other salts, management impacts, and areas at risk for invasive species. The Forest will consider including soil erosion modeling and maps within the EIS. WEPP was designed for modeling areas less than 1,000 acres; however, GeoWEPP or 6th level watershed analysis may be used to provide erosion information at a Forest scale. Elevated selenium levels are tied to areas with Green River Formation geology, most notably in the South Unit of the Roosevelt-Duchesne Ranger District. Sediment loading and selenium levels are water quality issues and are not monitored by the soils program on the Ashley National Forest.
U.S. EPA Region 8, Ethan Aumann	The Draft Assessment Report includes a discussion of land type associations (LTAs) and soil conditions in the planning area. We recommend that if a forest plan revision is deemed necessary, then the associated EIS provide a quantitative estimate of erosion rates. For example, erosion rates can be calculated using the Water Erosion Prediction Project (WEPP) model, a web-based interface developed by the U.S. Department of Agriculture, Agricultural Research Service, which can be accessed at http://www.ars.usda.gov/Research/docs.htm?docid=180848&f=1 . We recommend that the USFS consider using this model or another appropriate model that would be applicable to this planning area.	The Assessment Report for the Ashley National Forest summarized existing information. The Forest Plan Revision EIS will provide additional information on soil vulnerability that will include a review of soil erosion and related factors, including unstable parent materials, carbonates and other salts, management impacts, and areas at risk for invasive species. The Forest will consider including soil erosion modeling and maps within the EIS. WEPP was designed for modeling areas less than 1,000 acres; however, GeoWEPP or 6th level watershed analysis may be used to provide erosion information at a Forest scale. Elevated selenium levels are tied to areas with Green River Formation geology, most notably in the South Unit of the Roosevelt-Duchesne Ranger District. Sediment loading and selenium levels are water quality issues and are not monitored by the soils program on the Ashley National Forest.
U.S. EPA Region 8, Ethan Aumann	We recommend the USFS include a map of all groundwater resources in the planning area and discuss the following topics, as appropriate: * * * Identification of major aquifers, and their physical and chemical characteristics; * Location and extent of groundwater recharge areas; * Characterization of source water protection zones for public water systems; * Location of shallow and sensitive aquifers that are susceptible to contamination from surface activities, including alluvial aquifers along streams and rivers; and * Location of existing and potential (i.e., those that can reasonably be used in the future) underground sources of drinking water (USDW).	A more detailed discussion of groundwater resources is located on pages 80-83 of the Draft Air Soil and Watershed Resources technical report. A discussion of municipal watersheds and public drinking water sources is contained on pages 84-85 of this technical report. Additional maps and groundwater information will be incorporated into future stages of Forest Plan Revision.
U.S. EPA Region 8, Ethan Aumann	In order to ensure that public drinking water supply sources (e.g., surface water sources, including groundwater under the direct influence of surface water (GWUDISW) sources, and groundwater sources) are protected from potential impacts associated with USFS-authorized activities in the planning area, it is important to identify where these sources are located. Therefore, the EPA recommends that the USFS include a map depicting municipal supply watersheds 2 and source water protection areas for public water supply wells and surface water intakes (streams, rivers and reservoirs) in accordance with State data security requirements. We also recommend identifying reservoirs that are drinking water sources and an analysis of potential impacts to drinking water sources. You may contact Kate Johnson, UDEQ, at (801) 536-4206 or katej@utah.gov for access to the state data portal map of the Source Water Protection Zones for Public Water Supplies in the planning area. You may contact Kim Parker at Wyoming Department of Environmental Quality at (307) 777-6128 or kim.parker@wyo.gov for this information in Wyoming.	Drinking water systems are cited in the "Infrastructure" section of the Draft Assessment Report and described in greater detail in the corresponding Infrastructure technical report. Each of the 30 drinking water systems currently operated on the Ashley National Forest is tested monthly during their operational period to ensure they are meeting State drinking water standards.
U.S. EPA Region 8, Ethan Aumann	The Draft Assessment Report includes a qualitative discussion of wetlands, including the presence of fen wetlands in the planning area. As you are aware, fen communities are very sensitive to hydrologic alterations and restoration is extremely challenging once function has been impaired. Due to the slow rate of accumulation of peat in fens, these ecosystems are generally considered to be irreplaceable. The EPA recognizes fen-type wetlands as ecologically critical in that they provide local and regional biodiversity. The U.S. Fish and Wildlife Service (USFWS) designated fen wetlands a Resource Category 1 with respect to the USFWS Peatland Mitigation Policy. The mitigation goal of USFWS Resource Category 1 is no loss of habitat values and the Peatland Mitigation Policy places the protection and avoidance of fen wetlands as a priority during CWA Section 404 reviews. Further underlining the uniqueness and importance of fen wetlands, the U.S. Army Corps of Engineers carefully assesses and scrutinizes instances in which the use of Nationwide Permits are sought such that the unique wetland type peatlands/fens are protected. We recommend that the Draft Assessment Report include a description, acreage, and maps of any fens within the planning area.	The Ashley National Forest Assessment Report summarizes information found in companion technical reports. In the Air, Soil and Watershed Resources report are maps and acreages of likely palustrine emergent bed wetlands, derived from the National Wetlands Inventory. Examples of this wetland type include marshes, fens, pothole ponds and wet meadows. A summary of mapped springs on the Forest is also available in this technical report. The Aquatic Ecosystems technical report contains discussion on the 165 springs and fens surveyed using US Forest Service monitoring protocols. In the Rare Habitat Type section of the Terrestrial Ecosystems report is further discussion on known calcareous fens, glacial canyon fens, and limestone fens on the Forest. A recently updated map layer of the National Wetlands Inventory, depicting potential and probable fen habitat, will be incorporated into future stages of Forest Plan Revision.
U.S. EPA Region 8, Ethan Aumann	The Draft Assessment Report discusses some instances where forest roads may follow streams or flood plains, and their potential impacts to water resources. We recommend that the USFS include a map identifying the existing forest roads and trails network along with planning area waters. It would be helpful to note current and foreseeable construction, reconstruction, maintenance, storage, decommissioning, and watershed improvement activities, where such activities are positively or negatively affecting known roads and trails impacts to water resources.	Maps of streams, springs, and wetland areas were provided in the appendix to the Air, Soil, and Watershed Resources technical report. The 2011 Watershed Condition Framework (WCF), included in this technical report and in the Draft Assessment report, has multiple measures based on road/trail density, road condition, and proximity to water. Summary charts and Forest-wide watershed maps based on WCF results were provided in the more detailed technical report. Additional maps and geographic analysis will be considered during future stages of Plan Revision.
U.S. EPA Region 8, Ethan Aumann	The Draft Assessment Report includes a discussion of current air quality conditions in and near the planning area; sensitive receptors in the vicinity; airshed classifications; trends in air quality; and nearby emission sources. The Draft Assessment Report utilized data from the 2011 EPA national emissions inventory and we agree with the authors of the Air, Water, and Soil Resources Report that the 2014 national emissions inventory should be used for the remaining steps of the forest plan revision process. The most current National Emission Inventory data is available at http://www.epa.gov/air-emissions-inventories/2014-national-emissions-inventory-nei-data .	The 2014 National Emissions Inventory will be one of the newly available Air Quality datasets incorporated into future stages of Forest Plan revision.
U.S. EPA Region 8, Ethan Aumann	The EPA recommends including a quantitative emissions inventory for air pollution sources in the planning area where possible. An understanding of baseline conditions is needed to ensure that future USFS-authorized forest management activities, when combined with air quality impacts from other sources, do not adversely impact the NAAQS or AQRVs such as visibility.	The 2014 National Emissions Inventory will be one of the newly available Air Quality datasets incorporated into future stages of Forest Plan revision.
U.S. EPA Region 8, Ethan Aumann	The Draft Assessment Report provides a discussion of past and present oil and gas activity on the ANF, the status of existing leases, and the availability of the forest for leasing. The Draft Assessment Report indicates that the existing 1997 leasing decision for the South Unit is obsolete. The ANF intends to begin a new leasing analysis following the completion of a new Forest Plan. We also recommend that the Draft Assessment Report include estimates of reasonably foreseeable development (RFD) for the area. Without more detail on an updated RFD, it will be difficult to identify the appropriate level of air quality analysis should a Forest Plan revision be deemed necessary. At the outset of the NEPA process that will include an oil and gas leasing analysis, the EPA would like to have discussions with the USFS regarding the air quality impact analyses.	The 2014 National Emissions Inventory will be one of the newly available Air Quality datasets incorporated into future stages of Forest Plan revision.
U.S. EPA Region 8, Ethan Aumann	The Draft Assessment Report includes a socioeconomic analysis and demographic information for the planning area, including minority and low-income populations, employment, income, and poverty. The Draft Assessment Report includes comparisons of census block group percentages for minority and below poverty populations with state and national averages. The information suggests there are very low populations of minority and low-income individuals in the planning area, with unemployment rates below the national average and incomes close to the state and national averages. However, Utah and Duchesne Counties have Native American populations higher than state and national averages. We recommend the USFS discuss any disproportionately high and adverse human health and environmental impacts on these populations, as well as any plans for incorporating environmental justice concerns into the forest plan revision process.	Per Executive Order (EO) 12898, the Forest Service will analyze impacts of proposed management actions on any low income and minority populations. Analysis will be completed once proposed managed alternatives are developed, during the Land Use Plan/EIS process. In addition, the Forest Service will endeavor to provide information on the planning process and solicit input from all potentially impacted individuals and groups in the planning area, including Native American populations.
U.S. EPA Region 8, Ethan Aumann	Please include available groundwater quality information, and identify which shallow aquifers are sources for public water systems, domestic wells or stock wells.	A more detailed discussion of groundwater resources is located on pages 80-83 of the Draft Air Soil and Watershed Resources technical report. A discussion of municipal watersheds and public drinking water sources is contained on pages 84-85 of this technical report. Additional maps and groundwater information will be incorporated into future stages of Forest Plan Revision.
U.S. EPA Region 8, Ethan Aumann	We also recommend identifying any public water systems in the planning area with water quality violations or with requirements for increased frequency of monitoring for contaminants. The UDEQ and WDEQ are good sources of information concerning aquifers. Dan Hall manages the Groundwater Protection Section at the UDEQ and can be reached at (801) 536-4356 or dhall@utah.gov . Lily Lee is the Groundwater Section Manager at the WDEQ and can be reached at (307) 777-7072 or lily.lee@wyo.gov .	Drinking water systems are cited in the "Infrastructure" section of the Draft Assessment Report and described in greater detail in the corresponding Infrastructure technical report. Each of the 30 drinking water systems currently operated on the Ashley National Forest is tested monthly during their operational period to ensure they are meeting State drinking water standards.
The Nature Conservancy Utah Field Office, Ann Neville	There is no over-arching discussion of a balanced land-scale decision process that addresses thresholds for habitats in relationship with other multi-uses in the Draft Assessment.	Management direction to ensure species habitat protection from multiple use will be addressed when we start to write the actual Forest Plan.
The Nature Conservancy Utah Field Office, Ann Neville	There is an assumption 'remoteness' will protect habitats.	The assessment does not state nor assume that remoteness and inaccessibility is sufficient to protect endemic plants, but recognizes that these spatial and topographical conditions have reduced or limited anthropogenic impacts to some endemic and/or rare alpine plants in the Uinta Mountains.
The Nature Conservancy Utah Field Office, Ann Neville	There no indication of how Wilderness and Scenic designations being determined concurrently with the Revised Planning process will be integrated holistically in the plan.	The Wilderness Evaluation Process and Wild and Scenic River Process run concurrently with the Forest Plan Revision process and are informed by the assessment but are separate processes. The Ashley National Forest Plan Revision webpage includes a link to the U.S. Forest Service Region 4 Wilderness Planning Process Booklet, Wilderness Planning Process Booklet. The booklet explains how the Wilderness Evaluation Process coincides with the Forest Plan Revision Process on page 1. "The wilderness evaluation process has a sequence of 4 steps which includes a broad and inclusive inventory and evaluation of lands that may be suitable for further wilderness consideration based on a set of criteria based on the evaluation of lands identified in the inventory and through public participation, certain areas, or portions of areas, in the inventory are analyzed through a range of alternatives in the Forest Plan Environmental Impact Statement. Finally, a decision is issued, as part of the Forest Plan Revision decision, whether or not to make a preliminary administrative recommendation to add any units of land into the NWS. During each step of this process, public participation is a key component and will result in a process and decision that is transparent and inclusive. After the Forest Plan Revision decision is made, the preliminary administrative recommendation will then receive further review and possible modification by the Chief of the Forest Service, the Secretary of Agriculture, and the President of the United States. Only Congress can designate wilderness." The Wild and Scenic River process and how it is integrated in the Forest Plan Revision effort information is located on the Ashley National Forest Plan Revision webpage in the Wild and Scenic River Eligibility Study and Report Frequently Asked Questions, WSR Eligibility Study Frequently Asked Questions. On page 5 of the frequently asked questions is a flow chart that displays how the forest plan revision process and wild and scenic river study process cross walk with one another.
The Nature Conservancy Utah Field Office, Ann Neville	Of the reoccurring theme in many Technical Reports there is difficulty in implementing aspects of the existing plan for lack of resources and a number of systems are already experiencing a decline in resilience.	In the "Introduction" under "Assessing Conditions to Revise Our Forest Plan" the draft assessment states, "The existing plan, written in 1986, is outdated in many ways. Natural resource and social conditions have changed, new scientific information has become available, and additional land management laws have been put into place. There have been changes in communities, economic activity, and land and resource use patterns."
The Nature Conservancy Utah Field Office, Ann Neville	Not all the endemic species are listed as of concern, and it is unclear if changes in the management plan will occur based on the assumed sustainability of species within the Technical Report tables.	The Forest followed the 2012 Forest Planning direction for criteria when identifying potential Species of Conservation Concern (FSH 1919.12 Chapter 10, section 12.52. These criteria, while not the only information that was used, can be summed up as follows. Is the species native to the planning unit or not? What is the Global and State status of each species? In the past 20 years, how many occurrences and what year was the last occurrence for each species on the planning unit? Are the species occurrences accidental or transient on the planning unit? Is the species established or becoming established on the planning unit? What is the distribution, abundance, and trend of the species on the planning unit? What threats and risks does the species face on the planning unit? What habitat requirement does the species have? Is there substantial concern for this species to persist on the planning unit?
The Nature Conservancy Utah Field Office, Ann Neville	We realize the complexity of Forest Management. However, in different sections of the Assessment there are instances of overlapping and competing visions, goals, priorities and standards for the same areas. To address these inconsistencies, we are hoping to see in the environmental impact statement a robust cumulative assessment of the Forest management as a whole. For example: 1. How is the condition of watersheds affected from recreational, oil/gas use or wildfire? Will thresholds of watershed health be identified that will guide decisions to increase/decrease use or level of treatment (or other management changes) to ensure that these critical systems are maintained or improved?	The Forest Service is required to address cumulative effects. Per Forest Service Handbook 1909.15, Section 15.1 - "Cumulative effects must be considered and analyzed without regard to land ownership boundaries or who proposes the actions. Consideration must be given to the incremental effects of the action when added to the past, present, and reasonably foreseeable related future actions of the Forest Service, as well as those of other agencies and individuals, that may have a measurable and meaningful impact on particular resources." As such, cumulative effects will be fully analyzed in the environmental impact statement. The Forest Plan Environmental Impact Statement will address cumulative effects from each resource, albeit at a broader scale because of the scope of the Forest Plan. Each resource will have a section that provides discussion on cumulative effects. As a part of that, effects boundaries will be established which will form the basis of determining what other actions (past, present, and future) could have effects that could potentially combine with the effects of the proposed action, and thus create a cumulative effect.
The Nature Conservancy Utah Field Office, Ann Neville	Will remote areas become more accessible due to increased recreationalist pressure? Will thresholds of sensitive habitats be identified that will guide decisions to address accessibility?	This phase (assessment phase) of the Forest Plan Revision process evaluates current conditions on the planning unit. The next phase will evaluate direct and indirect effects to the resource (wildlife) from multiple use activities as well as measures that may be needed to avoid potential impacts. The Forest Service is required to address cumulative effects. Per Forest Service Handbook 1909.15, Section 15.1 - "Cumulative effects must be considered and analyzed without regard to land ownership boundaries or who proposes the actions. Consideration must be given to the incremental effects of the action when added to the past, present, and reasonably foreseeable related future actions of the Forest Service, as well as those of other agencies and individuals, that may have a measurable and meaningful impact on particular resources." As such, cumulative effects will be fully analyzed in the environmental impact statement. The Forest Plan Environmental Impact Statement will address cumulative effects from each resource, albeit at a broader scale because of the scope of the Forest Plan. Each resource will have a section that provides discussion on cumulative effects. As a part of that, effects boundaries will be established which will form the basis of determining what other actions (past, present, and future) could have effects that could potentially combine with the effects of the proposed action, and thus create a cumulative effect.
The Nature Conservancy Utah Field Office, Ann Neville	we are hoping that once a cumulative effects analysis has been completed there is a willingness to limit human uses if habitat and other critical Forest systems are negatively affected and resilience diminished.	The Forest Service is required to address cumulative effects. Per Forest Service Handbook 1909.15, Section 15.1 - "Cumulative effects must be considered and analyzed without regard to land ownership boundaries or who proposes the actions. Consideration must be given to the incremental effects of the action when added to the past, present, and reasonably foreseeable related future actions of the Forest Service, as well as those of other agencies and individuals, that may have a measurable and meaningful impact on particular resources." As such, cumulative effects will be fully analyzed in the environmental impact statement. The Forest Plan Environmental Impact Statement will address cumulative effects from each resource, albeit at a broader scale because of the scope of the Forest Plan. Each resource will have a section that provides discussion on cumulative effects. As a part of that, effects boundaries will be established which will form the basis of determining what other actions (past, present, and future) could have effects that could potentially combine with the effects of the proposed action, and thus create a cumulative effect.
The Nature Conservancy Utah Field Office, Ann Neville	the Uinta Basin is home to a number of endemic plants which are found nowhere else in the world. While all are not protected by any state or federal regulations, their endemism is of great biodiversity value. For many of these species little is known about their life cycles and potential negative effects from changes in land use directly and indirectly. We very much appreciate the tables prepared for the Species at Risk Technical Report and understand the process by which SPCC were determined. However, we have some concern that the assumption of remoteness and access that has protected some species will not be sustained due to increased recreationalist/oil-gas development pressures and fragmentation both within the Forest and adjacent lands.	The assessment does not state nor assume that remoteness and inaccessibility is sufficient to protect endemic plants, but recognizes that these spatial and topographical conditions have reduced or limited anthropogenic impacts to some endemic and/or rare alpine plants in the Uinta Mountains.
The Nature Conservancy Utah Field Office, Ann Neville	The Technical Reports have a lot of valuable information and a lot of work went into preparing these, we appreciate the effort and expertise of Forest Service employees. However, it was difficult to understand 'if and where there may be a need to change our existing forest plan', thus it is unclear how to comment on the Assessment. For some Technical Reports trend analyses and range of variation were addressed, while others identified key findings or data gaps. As a result, the Draft Assessment often doesn't seem to consistently capture some critical information from the Technical Reports in the Conclusions and Future Considerations sections or in the case of Plant Species at Risk have no conclusions.	Improvements are being made to the organization of information in the Assessment Report and to the Technical Reports that we hope will help with cross-referencing. Before the public reviewed and submitted comments the cooperating agencies and the USFS Regional Office were given a chance to review the Technical Report portion of the Assessment. All of those comments were reviewed and appropriately responded to with many corrections made. Comments that were statements of opinions and not referencing new scientific findings or data - may not have received a response. We are directed to produce a rapid assessment of scientific information on conditions and trends for the assessment and we were at 800 pages doing this with the technical reports.
Wild Utah Project	Page: 13 Comment: Include some language regarding the importance of linear riparian corridors for habitat connectivity not only for aquatic but also terrestrial species	In the Aquatic and Riparian Ecosystems part of the assessment we do briefly mention aquatic wildlife connectivity. This is further discussed in the more detailed technical report for aquatic ecosystems. Connectivity for both terrestrial and aquatic species is important and will be addressed when we revise the Forest Plan.
Wild Utah Project	some discussion regarding riparian vegetation communities providing necessary habitat structure for native bird species are critical is needed. (See existing scientific literature that provides some known thresholds for territory size and minimum distance/area metrics for native riparian birds).	The assessment is supported by several technical reports. The technical report for terrestrial ecosystems describes in detail riparian vegetation.
Wild Utah Project	Page: 16 Comment: Great to see discussion of overgrazing and unauthorized ORV use with respect to sedimentation and degraded stream banks. This begs the question for this section to address what might be done to ameliorate the situation. Will grazing allotments be assessed and AMUs reduced or removed in some areas? Need to include some direction about this somewhere in the document. If it is more appropriate in the grazing section include it there and refer to that section.	Grazing levels and rangeland conditions and trends are discussed in the Rangelands and Grazing section of the draft assessment. Livestock numbers and season of use are managed at the allotment level based on long-term resource monitoring. Neither the assessment nor the revised forest plan will determine AUMs or the stocking level on an allotment.
Wild Utah Project	Page: 17 Comment: Here it states that "22 had impaired function due to roads and trails having impacts on water" the reader is left wondering why did those roads and trails have impacts as not all roads and trails are impairing watersheds. If some of the underlying causes are road/trail side erosion, ORV use, improper/overgrazing, clarify and state those contributing categories of factors here.	Maps of streams, springs, and wetland areas were provided in the appendix to the Air, Soil, and Watershed Resources technical report. The 2011 Watershed Condition Framework (WCF), included in this technical report and in the Draft Assessment report, has multiple measures based on road/trail density, road condition, and proximity to water. Summary charts and Forest-wide watershed maps based on WCF results were provided in the more detailed technical report. Additional maps and geographic analysis will be considered during future stages of Plan Revision.
Wild Utah Project	Page: 18 Comment: The last two bullet points of areas of concern are distinct from the previous seven in that they cannot be readily addressed by USFS planning. It may be an important distinction to say that the others will/can be actively addressed in the new plan, while the final two are concerns that USFS planning attempts to address from an ecosystem resiliency standpoint.	Forest Handbook Guidance (FSH 1019.12.10) for the assessment phase of Forest Plan revision is a rapid evaluation existing information about relevant ecological, economic, and social conditions, trends, and sustainability and their relationship to the land management plan within the context of the broader landscape. Potential concerns related to air quality and climate change are among the topics to be included in the assessment. Pages 9-23 of the Air, Soil, and Watershed Resources technical report give an overview of the regulatory framework and current Ashley National Forest Plan direction for implementing air, soil and water programs. Status and trend sections of the Aquatics Ecosystem technical report (pages 6, 11, 16, 19, 23) also give examples of recent activities underway for watershed protection/restoration.
Wild Utah Project	Page: 18 Comment: Great to see an active direction on addressing improper or over-use of ORVs. This same approach and addition of brief text could be taken for the other 7 bullet points of 'areas of concern' (e.g. clear direction on reevaluating areas where grazing and oil and gas development occur).	Forest Handbook Guidance (FSH 1019.12.10) for the assessment phase of Forest Plan revision is a rapid evaluation existing information about relevant ecological, economic, and social conditions, trends, and sustainability and their relationship to the land management plan within the context of the broader landscape. Potential concerns related to air quality and climate change are among the topics to be included in the assessment. Pages 9-23 of the Air, Soil, and Watershed Resources technical report give an overview of the regulatory framework and current Ashley National Forest Plan direction for implementing air, soil and water programs. Status and trend sections of the Aquatics Ecosystem technical report (pages 6, 11, 16, 19, 23) also give examples of recent activities underway for watershed protection/restoration.
Wild Utah Project	Page: 23 Comment: See fourth paragraph: "In addition, if elk population increase" -It is not only the future potential increase in elk browsing that could threaten aspen recruitment but also the current sheep/goat grazing that could be decreasing recruitment now. It would make sense to include that language here as well as the potential area of concern where increased fragmentation or "pinch points" for ungulate movements will/may be an increasing concentration of ungulate herbivory (both native and domestic livestock). See aspen ecology literature Paul Rogers et al.	In the assessment, livestock and wildlife impacts are recognized as stressors to terrestrial vegetation communities where those impacts occur. These have been evaluated for past, current, and foreseeable impacts to vegetation communities, including rare and unique habitats. Refer to pages 17, 19, and 23 of the draft assessment and pages 9, 11-12, 19, 41, 61, and 75 in the Terrestrial Ecosystems Report that discuss domestic and wild ungulate impacts on terrestrial vegetation communities.
Wild Utah Project	Page: 29 Comment: A bullet point describing the problems with improper of overgrazing is notably absent	In the assessment, livestock and wildlife impacts are recognized as stressors to terrestrial vegetation communities where those impacts occur. These have been evaluated for past, current, and foreseeable impacts to vegetation communities, including rare and unique habitats. Refer to pages 17, 19, and 23 of the draft assessment and pages 9, 11-12, 19, 41, 61, and 75 in the Terrestrial Ecosystems Report that discuss domestic and wild ungulate impacts on terrestrial vegetation communities.
Wild Utah Project	Page: 29 Comment: Language addressing the importance of connected core areas and functioning wildlife corridors both for terrestrial and aquatic habitats is missing. This discussion should also include some direction regarding maintaining or improving a connected aquatic and terrestrial landscape as we know there are territory size thresholds at play for wide-ranging predator species and ungulates as well as aquatic and avian species. USFS planning and management from a landscape-level perspective is critical rather than a piecemeal approach that grazing allotments engender, for example.	In the Aquatic and Riparian Ecosystems part of the assessment we do briefly mention aquatic wildlife connectivity. This is further discussed in the more detailed technical report for aquatic ecosystems. Connectivity for both terrestrial and aquatic species is important and will be addressed when we revise the Forest Plan.
Wild Utah Project	Page: 33 Comment: Great to see mention of corridors. Include some language regarding direction for maintaining or improving wildlife corridors (or in some cases using existing data to infer where important wildlife corridors are and potential 'pinch-point' that can be avoided or mitigated).	In the Aquatic and Riparian Ecosystems part of the assessment we do briefly mention aquatic wildlife connectivity. This is further discussed in the more detailed technical report for aquatic ecosystems. Connectivity for both terrestrial and aquatic species is important and will be addressed when we revise the Forest Plan.
Wild Utah Project	Page: 33 Comment: Include a bullet point that addresses the concern expressed in the introduction of the document = increased frequency, duration, and magnitude of human activity/visitation to the Forest as well as development in and around the Forest. Both indirect (e.g. behavior, mating, foraging, movement of individual wildlife and populations) and direct effects on wildlife (vehicle-wildlife collisions, increase number of 'problem wildlife' as human-wildlife encounters occur, degradation/loss of habitat etc.) may result with an increase in human activity in the form of visitation and/or development.	This phase (assessment phase) of the Forest Plan Revision process evaluates current conditions on the planning unit. The next phase will evaluate direct and indirect effects to the resource (wildlife) from multiple use activities as well as measures that may be needed to avoid potential impacts.
Wild Utah Project	Are non-native animals and plants being adequately addresses in different section: terrestrial/aquatic/effects on species at risk?	More detailed information and analysis on plants and animals is found in the technical reports as well as the supporting individual species assessments.
Wild Utah Project	Although not yet a NEPA document, need to be considering cumulative effects: landscape-level connectivity for example.	The Forest Service is required to address cumulative effects. Per Forest Service Handbook 1909.15, Section 15.1 - "Cumulative effects must be considered and analyzed without regard to land ownership boundaries or who proposes the actions. Consideration must be given to the incremental effects of the action when added to the past, present, and reasonably foreseeable related future actions of the Forest Service, as well as those of other agencies and individuals, that may have a measurable and meaningful impact on particular resources." As such, cumulative effects will be fully analyzed in the environmental impact statement. The Forest Plan Environmental Impact Statement will address cumulative effects from each resource, albeit at a broader scale because of the scope of the Forest Plan. Each resource will have a section that provides discussion on cumulative effects. As a part of that, effects boundaries will be established which will form the basis of determining what other actions (past, present, and future) could have effects that could potentially combine with the effects of the proposed action, and thus create a cumulative effect.

Wild Utah Project	Page: 34 Comment: The first two bullet points at the top of the page are more like statements of fact than concerns and beg questions: 1) If Protected Area Locations do not all provide suitable habitat for species on the Ashley what direction needs to be taken? Do more suitable habitat areas need protection designations? Do habitat improvements and/or grazing/QRV restrictions need to be made in existing protected areas? 2) We know that species interactions are important. Can some added direction be included here to address how some indicator/keystone/focal species need increased protection or habitat improvements in order to ensure functioning habitats?	Management direction to ensure species habitat protection from multiple use will be addressed when we start to write the actual Forest Plan.
Wild Utah Project	the Draft Assessment table of contents or section headings do not match the Technical Reports. For example, cross referencing the Technical Reports to the Assessment for Watersheds and Riparian and Aquatic was confusing.	Improvements are being made to the organization of information in the Assessment Report and to the Technical Reports that we hope will help with cross-referencing. Before the public reviewed and submitted comments the cooperating agencies and the USFS Regional Office were given a chance to review the Technical Report portion of the Assessment. All of those comments were reviewed and appropriately responded to with many corrections made. Comments that were statements of opinions and not referencing new scientific findings or data – may not have received a response. We are directed to produce a rapid assessment of scientific information on conditions and trends for the assessment and we were at 800 pages doing this with the technical reports.
Wild Utah Project	in areas suitable for special designation of Wilderness or Wild and Scenic - how will these promised studies and recommendations be integrated into the Assessment and next steps in the Plan Revision?	The Wilderness Evaluation Process and Wild and Scenic River Process run concurrently with the Forest Plan Revision process and are informed by the assessment but are separate processes. The Ashley National Forest Plan Revision webpage includes a link to the U.S. Forest Service Region 4 Wilderness Planning Process Booklet, Wilderness Planning Process Booklet. The booklet explains how the Wilderness Evaluation Process coincides with the Forest Plan Revision process on page 1. The wilderness evaluation process has a sequence of 4 steps which includes a broad and inclusive inventory and evaluation of lands that may be suitable for further wilderness consideration based on a set of criteria. Based on the evaluation of lands identified in the inventory and through public participation, certain areas, or portions of areas, in the inventory are analyzed through a range of alternatives in the Forest Plan Environmental Impact Statement. Finally, a decision is issued, as part of the Forest Plan Revision decision, whether or not to make a preliminary administrative recommendation to add any units of land into the NWPS. During each step of this process, public participation is a key component and will result in a process and decision that is transparent and inclusive. After the Forest Plan Revision decision is made, the preliminary administrative recommendation will then receive further review and possible modification by the Chief of the Forest Service, the Secretary of Agriculture, and the President of the United States. Only Congress can designate wilderness". The Wild and Scenic River process and how it is integrated in the Forest Plan Revision effort information is located on the Ashley National Forest Plan Revision webpage in the Wild and Scenic River Eligibility Study and Report Frequently Asked Questions, WSR Eligibility Study Frequently Asked Questions . On page 5 of the frequently asked questions is a flow chart that displays how the forest plan revision process and wild and scenic river study process cross walk with one another.
Wild Utah Project	We appreciate the findings of the 2008 Suitability Study in identifying the Upper Uinta River and Green River as wild or scenic as well as the geological and natural areas listed in the Assessment and hope they will receive added protection and attention to sustain their unique attributes.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas. These ecosystems are described in the Assessing Terrestrial and Aquatic Ecosystems section under Rare Habitat Types. These ecosystems were described because they are believed to be minimally represented in the planning area and could potentially be considered as designated areas and evaluated in the EIS analysis.
Wild Utah Project	What are the cumulative impacts from fragmentation from oil/gas access on various habitats? and can new oil/gas impacts be clustered to reduced additional fragmentation and help with restoration efforts?	The purpose of the assessment is to identify risk and threats to various resources. As we get further into the planning process we will look at mitigations, design criteria, cumulative impacts, etc..
Tom Elder	The draft assessment report lacks, and the final assessment needs, a complete list of inventoried Roadless Areas (IRAs), protected under the Roadless Area Conservation Rule. Maps and descriptions of these IRAs will give an idea of the ecological and social values that they conserve.	Information on the Ashley inventoried Roadless Areas and Research Natural Areas have been added to the Recreation, Designated Areas, Settings, and Access Technical Report. The information added to the Technical Report has been summarized in the Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest, Recreation, Designated Areas, Settings, and Access section.
Tom Elder	the draft assessment report lacks, and the final assessment needs, a complete description of the Ashley's seven existing Research Natural Areas (RNAs). The RNAs should be identified, with their names, maps, and descriptions that will give an idea of the ecological and social values that they conserve.	Research Natural Areas (RNAs) are important special land designations on National Forest System lands. The 2012 planning rule does not require an evaluation of existing RNAs, or for a Forest to make a recommendation for more RNAs during the forest plan revision process. A description of existing RNAs on the Forest could be included when describing existing conditions during the EIS analysis.
Tom Elder	All caves protected under the Federal Cave Resources Protection Act should have some sort of individual management plan. I'm not sure they were even mentioned in the draft assessment. I realize that their location and access concerns sensitive information that should not be made public, but that the Ashley still needs such plans. Particular attention should be given to the caves that already receive recreational attention, those being Sheep Creek, Pole Creek, and Massey. White rocks Cave is of course important, but it will also no doubt be addressed, and is difficult of access and gated. None of the other three caves are effectively gated (Sheep Creek Cave gating has been breached and not repaired, so it is no longer protected). The other caves should be kept "out of the public view" to help preserve their irreplaceable resources.	The Ashley National Forest intends to continue to identify and manage significant natural caves, as required under the Federal Cave Resources Protection Act, and as time and budgets allow. We hope to develop plans for future management of significant caves and important karst areas, as part of this forest planning effort. Although numerous natural caves and karst areas are known to exist on the Forest, not every cave or karst area needs its own unique or dedicated management plan. The draft assessment notes that 41 caves within the Ashley National Forest have been identified and designed as significant federal caves. However, the names, locations, and resources of significant federal caves are protected and kept confidential, to protect their unique resources from deliberate or inadvertent harm, in accordance with agency regulations and the 1988 Federal Cave Resources Protection Act.
Tom Elder	In view of the unprecedented climate change during which this revised forest plan will operate, MORE protected areas should be created, as a hedge against these changes. In particular, the Ashley should designate a number of important watershed and water resources, as climate change and other human-caused stressors threaten water supplies. Such important water features would include: A. The Lost Creek Sink on the neighboring Wasatch-Cache, which traverses through the Madison aquifer, and emerges at Big Springs, forming important spawning habitat for Flaming Gorge Kokanee salmon.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas. These ecosystems are described in the Assessing Terrestrial and Aquatic Ecosystems section under Rare Habitat Types. These ecosystems were described because they are believed to be minimally represented in the planning area and could potentially be considered as designated areas and evaluated in the EIS analysis.
Tom Elder	Similar karst streams on both the north flank of the Uintas in the Flaming Gorge District, and the south flank of the Uintas in Vernal and Roosevelt Districts, whose downstream exits from these karst systems feed springs that are major water sources for the communities in Daggett, Duchesne, and Uintah counties. As an example, to protect its municipal water supply, Uintah County has proposed a "watershed protection zone" focused on the Dry Fork Sink to Ashley Spring karst system (Ashley Springs Water Protection Zone, established by Uintah County Ordinance in 2013). The report should identify designated other such areas USFS land on adjacent state, county, or federal lands. In particular, watersheds that preserve the entire sequence of glacial cirque/stream/sink/cave/spring should be conserved, including Pole Creek from Upper Rock Lake to the unnamed spring near Pole Creek Cave, Blind Stream, Dry Fork from Deadman Lake down to the USFS boundary, North Fork Dry Fork from Chimney Rock Lake down to the junction with Dry Fork, and South Fork of Ashley Creek from Lakeshore Basin/Hacking Lake down to the USFS/BLM boundary. The map showing areas of "susceptible bedrock to karst development" seems to just show the surface exposures of Madison Limestone (and perhaps the other 2 units). But the Madison underlies a much larger area than that, and the karst systems exist at depth over that much larger area. For example, the map doesn't show the karst connection between the Dry Fork Sinks and Rises with Ashley Springs in Ashley Gorge. This understates the true magnitude of the karst resource. Since these springs are the municipal water supplies or spawning water sources, they should be heavily conserved, particularly in their up-sink watersheds.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas. These ecosystems are described in the Assessing Terrestrial and Aquatic Ecosystems section under Rare Habitat Types. These ecosystems were described because they are believed to be minimally represented in the planning area and could potentially be considered as designated areas and evaluated in the EIS analysis.
Tom Elder	Many glacial cirque lakes that were created by glacial scouring of the upper parts of the Uinta's streams just 10,000 years ago, are now threatened by sedimentation. While there is a natural sequence to these events, the glacial headwaters feeding these streams should have a special designation which will provide management the ability to restrict vehicular access or to curtail overgrazing, which might hasten the loss of these water bodies.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas. These ecosystems are described in the Assessing Terrestrial and Aquatic Ecosystems section under Rare Habitat Types. These ecosystems were described because they are believed to be minimally represented in the planning area and could potentially be considered as designated areas and evaluated in the EIS analysis.
Tom Elder	The Assessment Summary says that "One thing the vegetation types all have in common is the potential effects from climate change". Therefore, it would be prudent to have Research Natural Areas (or a similar protective designation) that protect representative examples of each of the 6 vegetation communities listed (and their subcategories, as noted below). Such RNAs would provide a different sort of a baseline, one that is shifting over time under the stress of climate change, but in the absence of human impact. If possible, these RNAs should not be remote and difficult of access for study, but instead be relatively accessible for study. Such areas that have old-growth components would be most preferable. Also, if the areas could be cross-referenced for the presence of plant species of conservation concern. These areas would include D. the Youth Experimental Forest in Browne Canyon, which was treated in the 1950's, and would serve as one good benchmark of ecological integrity. E. RNAs or other protective category for the dominant vegetation types.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas. These ecosystems are described in the Assessing Terrestrial and Aquatic Ecosystems section under Rare Habitat Types. These ecosystems were described because they are believed to be minimally represented in the planning area and could potentially be considered as designated areas and evaluated in the EIS analysis.
Tom Elder	Prescribed fire should be the main process by which the seral aspen of the ANF is regenerated. The same comment applies to most of the ANF, since the restoration of fire to the wild land ecosystems is an oft-stated goal of the USFS. Logging does not exactly replicate the complex changes that fires start, and should not be regarded as the "first resort" for restoring a forest to health. We applaud the Ashley, especially Flaming Gorge District but also the forest as a whole, in the efforts to institute prescribed fire as a management tool.	Fire has been a useful tool for restoration along with other mechanical tools such as thinning and logging. The development of the new forest plan will establish the desired condition of the forest, the subsequent projects developed under the new forest plan will determine which tool is appropriate to reach that desired state. Because the Assessment shows that the lack of fire has led to negative consequences for the forest, it is expected that fire as a tool and playing its natural role in the ecosystem will continue.
Tom Elder	Each of the 5 types of coniferous forests should have RNAs which have minimal human impact, again, for comparison purposes.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas. These ecosystems are described in the Assessing Terrestrial and Aquatic Ecosystems section under Rare Habitat Types. These ecosystems were described because they are believed to be minimally represented in the planning area and could potentially be considered as designated areas and evaluated in the EIS analysis.
Tom Elder	Englemann spruce. Englemann spruce is a species which has been mapped for occurrences of old-growth groves. These old-growth forests, typically in relatively high, protected coves, should be protected from logging for their aesthetic as well as their scientific value. Such groves that exist in heavily roaded areas like the highest valleys in Trout Slope East and West would be relatively accessible for study.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas. These ecosystems are described in the Assessing Terrestrial and Aquatic Ecosystems section under Rare Habitat Types. These ecosystems were described because they are believed to be minimally represented in the planning area and could potentially be considered as designated areas and evaluated in the EIS analysis.
Tom Elder	Lodgepole pine. Lodgepole was extensively logged during the bark beetle epidemic of the 20th century, by clear cut, shelterwood, and selective logging. Representative unmanaged lodgepole should be set aside for study. In particular, "doghair" lodgepole forests have been devalued as forest that is dysfunctional and in need of management (the summary refers to "overcrowded stands", which seems like an unscientific value judgment as applied to lodgepole pine especially). But it seems likely that such forests provide habitat needs to certain wildlife species that are poorly understood, and representative examples should be preserved.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas and evaluated in the EIS analysis.
Tom Elder	Ponderosa pine dominates the Flaming Gorge District and NRA, which aggressively manages them (with success). Nevertheless, there should be areas where these trees are unmanaged, even if their fuel loading is high, and even though the first tendency for the ANF is to be "hands on".	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas and evaluated in the EIS analysis.
Tom Elder	Pinyon-juniper. P-J forest management is complicated by the cheatgrass understory, which threatens to convert woodland to "cheatgrass deserts". As was the case of the Mustang Fire, long exclusion and suppression of fire had provided a continuous fuel at the canopy level, while at the same time eliminating the seed bank that ordinarily would restart the community. Fuel wood cutting to reduce canopy cover should be used to try and restore balance.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas and evaluated in the EIS analysis.
Tom Elder	The following "minority component" species deserve careful consideration: Subalpine fir is so widely distributed at timberline and below, that representative forests will likely be protected by various USFS designations. They also live in areas with less human impact, being as high. Bristlecone pine (Pinus longaeva). This species is at the edge of its range on the South Uinta. These limited groves need special protection. Limber pine. This species is widely but sparsely distributed, and some populations should be a part of some designated protective category, whether wilderness, roadless area, RNA, or some other designation. Blue spruce. Widely but sparsely distributed, same comment as limber pine above.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas and evaluated in the EIS analysis.
Tom Elder	The Assessment identifies the "Potential Need & Opportunity for Additional Designated Areas". As described above, the 2012 planning rule requires that assessments evaluate the potential need and opportunity for additional designated areas. The Ashley National Forest's draft assessment report fails to include any discussion of the potential need and opportunity for additional designated areas. This deficiency should be remedied in the final assessment report. I suggest the following areas: 5 Geological "Event" Special Management Areas. These areas would preserve for future study the sites of historical events. After the event has been sufficiently mitigated – which happened decades ago for both of the areas described – the areas would be preserved as case studies. A Mosby Breach Special Management Area. As in the Johnstown Flood National Historic Site, this area is instructive as an impossible-to-simulate event that dramatically affected the ANF. B Sheep Creek Debris Flow Special Management Area. As in the Johnstown Flood National Historic Site, these areas are instructive as created by impossible-to-simulate events that dramatically affected the ANF. They are also likely sites for future significant geological events.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas and evaluated in the EIS analysis.
Tom Elder	the Ashley includes a number of sites, facilities, and resources that lend themselves to educational and other opportunities to connect youth and underserved populations with nature. These include, but are not limited to, the Red Canyon Visitor Center, Cart Creek Firefighters Memorial, Ute Fire Tower, Youth Experimental Forest (in Browne Canyon), Dry Fork Nature Trail, and Dry Fork Flume Interpretive Trail.	The Recreation Opportunities, Designated Areas, Settings, and Access technical report includes an opportunities for greater connection between people and nature section. This section discusses the current activities the Ashley is engaging in to connect people and nature, including volunteer projects, webcams, and smart phone applications. This section and the Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest Recreation Opportunities, Designated Areas, Settings, and Access conclusions and future considerations discusses the need for an forest wide interpretation and education plan and an education plan for the High Uintas Wilderness.
DPLC, Henry Gutz	In August of 2016 community meetings were held on "wilderness evaluation process" in the local communities, but wilderness expansion or reduction were not addressed (reference to page 6 of the Revision). ROAD-LESS and the designation of road-less, more specific, management for wilderness characteristics, were not addressed in the Revision. The road-less designation effected the timber industry in the local community.	The Wilderness Evaluation Process and Wild and Scenic River Process run concurrently with the Forest Plan Revision process and are informed by the assessment but are separate processes. The Ashley National Forest Plan Revision webpage includes a link to the U.S. Forest Service Region 4 Wilderness Planning Process Booklet, Wilderness Planning Process Booklet. The booklet explains how the Wilderness Evaluation Process coincides with the Forest Plan Revision process on page 1. The wilderness evaluation process has a sequence of 4 steps which includes a broad and inclusive inventory and evaluation of lands that may be suitable for further wilderness consideration based on a set of criteria. Based on the evaluation of lands identified in the inventory and through public participation, certain areas, or portions of areas, in the inventory are analyzed through a range of alternatives in the Forest Plan Environmental Impact Statement. Finally, a decision is issued, as part of the Forest Plan Revision decision, whether or not to make a preliminary administrative recommendation to add any units of land into the NWPS. During each step of this process, public participation is a key component and will result in a process and decision that is transparent and inclusive. After the Forest Plan Revision decision is made, the preliminary administrative recommendation will then receive further review and possible modification by the Chief of the Forest Service, the Secretary of Agriculture, and the President of the United States. Only Congress can designate wilderness". The Wild and Scenic River process and how it is integrated in the Forest Plan Revision effort information is located on the Ashley National Forest Plan Revision webpage in the Wild and Scenic River Eligibility Study and Report Frequently Asked Questions, WSR Eligibility Study Frequently Asked Questions . On page 5 of the frequently asked questions is a flow chart that displays how the forest plan revision process and wild and scenic river study process cross walk with one another.
DPLC, Henry Gutz	An increase in recreational activities but a reduction in services provided	Campground infrastructure deferred maintenance, lack of funding, and increased demand is discussed in the Recreation Current Activity, Trends, and Conditions, Developed Recreation and Sustainable Recreation sections of the Recreation Technical Report. Current and past actions to keep campgrounds open and usable with declining budgets are also discussed in the Sustainable Recreation section of the Recreation Technical Report.
DPLC, Henry Gutz	In years of drought agricultural producers have relinquished AUM's and have yet to see returns or means to those returns. Not addressed.	Data have been corrected to show the total AUMs as 70,772. As noted in the footnote to Table 3, Draft assessment p 78, AUM data are variable. The AUM Data provided in the table represents levels in the database at the time information was viewed. Text has been modified to include that an approximate one percent change in overall permitted grazing has occurred. As noted in the draft assessment (p 78), there are a number of factors that could impact the gap between permitted and authorized grazing and achieving full use of the grazing availability, such as level and timing of precipitation. Project area specific information for this issue was not readily available at the assessment stage but the EIS may consider potential causes of this gap if it is related to the proposed action. Livestock numbers and season of use are managed at the allotment level based on long-term resource monitoring. Neither the assessment nor the revised forest plan will determine AUMs or the stocking level on an allotment .
DPLC, Henry Gutz	The Revision and the needed update is an on going process and needs to look into the future less the past. The past needs to be looked at in order to determine the future (for example, Clear Cut Harvest - How does it effect our future - Where are we today with that management policy of that time?). Historically speaking the United States Forest Service (USFS) had a long time slogan of "Multiple Use and Sustained Yield". The Revision deals with a multiple of uses and sustainability.	We are definitely striving to meet the intent of the 2012 Planning Rule and look for opportunities to encourage multiple use.
DPLC, Henry Gutz	Who pays to play? This IS the economy of the local communities. Gross revenues of the North Slope (Reference to the north slope for reason of lack of oil, gas, mineral significance, inclusive of Wy.)	The Assessment report is intended to be a rapid analysis of existing available information (see Forest Service Handbook 1909.12 - Land Management Planning Handbook, Chapter 10). This assessment includes the social and economic contributions from the activities in the planning area as a whole. As additional forest users are identified, the social and economic analysis for the EIS will include impacts to these users, as appropriate.
DPLC, Henry Gutz	AGRICULTURAL: AUM's	Data have been corrected to show the total AUMs as 70,772. As noted in the footnote to Table 3, Draft assessment p 78, AUM data are variable. The AUM Data provided in the table represents levels in the database at the time information was viewed. Text has been modified to include that an approximate one percent change in overall permitted grazing has occurred. As noted in the draft assessment (p 78), there are a number of factors that could impact the gap between permitted and authorized grazing and achieving full use of the grazing availability, such as level and timing of precipitation. Project area specific information for this issue was not readily available at the assessment stage but the EIS may consider potential causes of this gap if it is related to the proposed action. Livestock numbers and season of use are managed at the allotment level based on long-term resource monitoring. Neither the assessment nor the revised forest plan will determine AUMs or the stocking level on an allotment .
DPLC, Henry Gutz	RECREATIONAL: Seasonal passes, special use fees and campground fees	Campground infrastructure deferred maintenance, lack of funding, and increased demand is discussed in the Recreation Current Activity, Trends, and Conditions, Developed Recreation and Sustainable Recreation sections of the Recreation Technical Report. Current and past actions to keep campgrounds open and usable with declining budgets are also discussed in the Sustainable Recreation section of the Recreation Technical Report.
DPLC, Henry Gutz	TIMBER: (forest) Sales. What are the figures? If there is a difference in cost verse revenues is it adjustable? after all - it is called the USFS. In a product that requires a 100 year growth as compared to an annual management, the management of a forest should not be measured in yearly production rates as in sustainability of the forest and the community, but in decades (10 year) or more.	Historic harvest levels are provided on pages 81-82 of the Draft Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest. Cost and revenues vary from project to project. The value of timber on the Ashley National Forest tends to be low, because of the relatively small size of the trees and high logging cost. Still, timber harvesting is often the most cost-effective method of managing the forest vegetation to achieve multiple-use objectives. Tree growth rates on the Ashley National Forest are generally slow. Timber management is a long-term proposition. Growth rates are taken into consideration to determine appropriate harvest levels to ensure harvesting does not exceed the productive capacity of the land.
DPLC, Henry Gutz	FUTURE MANAGEMENT STRATEGIES: Fire is not the answer. It is a part of but not the only tool.	Fire has been a useful tool for restoration along with other mechanical tools such as thinning and logging. The development of the new forest plan will establish the desired condition of the forest, the subsequent projects developed under the new forest plan will determine which tool is appropriate to reach that desired state. Because the Assessment shows that the lack of fire has led to negative consequences for the forest, it is expected that fire as a tool and playing its natural role in the ecosystem will continue.
DPLC, Henry Gutz	Diversity in recreational trends. ATV,OHV and now with remote control devices (drones), the outdoors isn't so much "outdoors".	The Recreation Technical Report discusses changing recreation uses and user competition in the Recreation Current Activities, Trends, and Conditions. The statement "competition for use of available land is increasing between motorized, non-motorized, and bicycle recreation users" has been added to the Recreation Opportunities, Designated Areas, Settings, and Access Technical Report summary section and the Ashley Assessment Recreation Opportunities, Designated Areas, Settings, and Access conclusions and future considerations.
Don Hall	I have been using the Ashley forest for 60 some odd years now. I have been there with my parents and grandparents since before I was big enough to pack a piece of firewood. My granddad showed us old camps and trails made by the CCC, of which I participated in back in the day. In those days there were numerous side roads and trails off the main road. Roads made by early pioneers, cattlemen, sheep men, hunters, campers and miners. Through the years these trails and roads were primarily maintained by the people and public using them. I wish I had a nickel for every branch cut, moved tree, or rock placed in a washout. Campers and fire wood cutters kept most of the downed wood cleared along these trails and roads. That use along with selective timber sales created excellent fire breaks and access ways for firefighting—in recent years however, over 90% of those roads and trails have been closed to public access. This led to overgrowth to the point that many now are impassible losing the benefit of the fire breaks along the roads. Combined with the beetle kill, the dead and down fuel have the high potential of the same result of the recent Brian Head Fire. —I have heard enough from the special interest groups, many of which have never set foot in our state, much less our forest. They want the forest left pristine and untouched, but you don't hear a peep out of them after these huge fires and the damage they cause. —I would like to say that some common sense compromise would benefit everyone, especially the forest. Open those roads and trails back up. Regain the benefit and value of firefighting access and firebreaks. Demonstrate to those that would complain of the perceived unsightliness of a road or trail is much preferred to the scorched remains of a wind blown wildfire. Even more important, talk to your fire fighters—I mean the people that actually put out the fires, not a manager or some PR rep. Talk to the people that have to climb around in that damned beetle kill fuel-filled dense forest trying to create a fire line, and hope a reversing wind doesn't put them on the run. I along with many others would like to see these roads opened back up. I know of a couple that the BLM has had to re-open because they were illegally closed in the first place. I would be willing to demonstrate the benefits of existing open trails if need be.	As addressed in the assessment, there are many factors such as climate (drought), vegetative conditions that contribute to the available burnable fuel and the number and cause of fires. The assessment does not address the specific economics associated with the potential tools used to treat vegetation, but it does identify where and why vegetation conditions have the potential for risk for current and future wildfires. With regard to travel management: As stated in the Infrastructure section, the published motorized travel plan from 2009 and travel analysis report from 2015 will be incorporated into the revised forest plan and will not be readdressed in the revision process. Based on the 2012 planning rule, assessments are intended to provide clear information for what needs to change in the forest plan. It does not cover the objection process or litigation associated with individual lawsuits from the other projects and activities that implement land management plans requiring an environmental analysis or environmental impact statement.

Chad Hamblin	I am concerned that the revision doesn't include a list of roadless areas - I think that should be part of the revision.	Information on the Ashley inventoried Roadless Areas and Research Natural Areas have been added to the Recreation, Designated Areas, Settings, and Access Technical Report. The information added to the Technical Report has been summarized in the Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest. Recreation, Designated Areas, Settings, and Access section.
Chad Hamblin	I'm also concerned that it doesn't include a list of research natural areas. I think there should be a lot more research natural areas and that a list of them should be included in the plan.	Research Natural Areas (RNAs) are important special land designations on National Forest System lands. The 2012 planning rule does not require an evaluation of existing RNAs, or for a Forest to make a recommendation for more RNAs during the forest plan revision process. A description of existing RNAs on the Forest could be included when describing existing conditions during the EIS analysis.
Chad Hamblin	I would like to see a list of caves on the Ashley since caves are an important feature on the forest.	The Ashley National Forest intends to continue to identify and manage significant natural caves, as required under the Federal Cave Resources Protection Act, and as time and budgets allow. We hope to develop plans for future management of significant caves and important karst areas, as part of this forest planning effort. Although numerous natural caves and karst areas are known to exist on the Forest, not every cave or karst area needs its own unique or dedicated management plan. The draft assessment notes that 41 caves within the Ashley National Forest have been identified and designated as significant federal caves. However, the names, locations, and resources of significant federal caves are protected and kept confidential, to protect their unique resources from deliberate or inadvertent harm, in accordance with agency regulations and the 1988 Federal Cave Resources Protection Act.
Duchesne County Water Conservancy District, Clyde Watkins	In reviewing the draft report, we were pleased to see the acknowledgment on pg.15 of the importance of groundwater resources originating on the Ashley National Forest to local communities and agriculture, also the acknowledgment of the numerous irrigation pipelines and canals that are so vital to the Uintah Basin's economy that operate under special use permits. As the majority of the water supplies available to the residents of the Uintah Basin originate within Forest Service boundaries, we are always concerned that there not be any adoption of policies that might impact the ability of canal companies and culinary water districts to access facilities and hamper their operation and maintenance work or the development of much-needed future water storage projects.	Your comments are noted. The cited passages in the Draft Assessment Report (and additional sections in the Air, Soil and Watershed Resources technical report and the Socioeconomic technical report) recognize the importance water resources and healthy watersheds for the wide range of socio-economic and ecosystem services they provide. The current Forest Service Manual (FSM) states that timber harvest plans can be considered to increase water yields, but that such practices should only be implemented if "cost-effective, environmentally and scientifically feasible, and consistent with other resource uses and values." (U.S. Forest Service - FSM 2522.12). The Intermountain Region (Region 4) has further defined policy related to water yield management in a letter to all Forest Supervisors (U.S. Forest Service 2002), which emphasizes "optimal" water yield rather than "maximum" water yield. Optimum water yield implies healthy vegetative and aquatic ecosystems, which supply clean water for all beneficial uses of that water, both consumptive and non-consumptive.
Duchesne County Water Conservancy District, Clyde Watkins	On pg. 22, Par. 1, the following statement is made, "The fen in Whitefrocks Canyon has been negatively affected due to a road that crosses the fen." There is only one spot on the whole length of the Whitefrocks Canyon road that has any moisture that might possibly qualify as a (very small) fen." This area (approximately 8'x10' in circumference) at the side of the road should not be used as a reason to close access to the Whitefrocks Canyon Road above that point. We would like to stress that a large number of fishermen and hikers utilize the Whitefrocks Road clear to the end of the current road. We feel there is adequate habitat for the bristletailed sedge from the south side of the road to the Whitefrocks River in that area, and probably other areas within the canyon. We would definitely like to see this sentence removed from the final document as it has the misleading potential to restrict access to the road in the future which would be extremely unfortunate from the standpoint of the general public.	As defined in 36 CFR 219.5 and in Forest Handbook Guidance (FSH 1019.12_10), a key function of assessments is to rapidly evaluate existing information about relevant ecological, economic, and social conditions, trends, and sustainability and their relationship to the land management plan within the context of the broader landscape. The glacial canyon fen described in the Terrestrial Ecosystems technical report and mentioned briefly in the Draft Assessment Report was a part of the assessment of rare ecosystems. As described in the technical report the condition of the fen is slightly affected by a road crossing a portion of the fen. The stressor does not affect the majority of the site which remains in stable condition. Specific decisions on transportation routes are not within the scope of this assessment for Forest Plan revision.
Duchesne County Water Conservancy District, Clyde Watkins	Pg. 25, Par. 3, the draft states, "Although timber harvest and prescribed burning can help thin overcrowded stands and provide some benefits that regular fires once did, not enough active management has occurred on the Ashley to keep up with needed forest restoration. We have not had opportunities to salvage wood products from widespread bark beetle infestations due to factors such as lack of infrastructure (such as roads) and fluctuating timber markets." We would suggest instead of closing roads on the Forest that some of the roads that were closed in the past (for example, the logging, fishing, and recreational road north of the Whitefrocks West Fork trail head that was closed in approximately 1995 despite numerous public comments against its closure) be reevaluated in light of the statement made in Par. 3, and some of these useful roads actually be opened up again to public access. There may be other forest roads that have been closed that should be reevaluated to provide better access for wood-gathering and fire-fighting activities, as well as dispersing recreational usage over a broader area. Past policies seem to have become more and more restrictive to public access consequently discouraging the public in salvaging wood products which could assist in reducing forest fuel load. We would like to see public vehicular access enhanced on the Forest.	The management of system roads and routes is generally addressed in the Travel Management Plan or at the site specific NEPA level. Closure of non-system routes on the Forest is an administrative process and will not be addressed in the assessment. Regarding the 2001 Roadless Rule and timber suitability, the 2012 Planning Rule requires the Forest Service to determine "Lands Not Suitable for Timber Production" (36 CFR 219.11). This includes lands where statute, executive order, or regulation prohibits timber production on the land or The Secretary of Agriculture or the Chief has withdrawn the land from timber production (36 CFR 219.11(a)). The directives associated with the 2012 Planning Rule define Inventoried Roadless Areas as Administratively Designated Areas by the Secretary of Agriculture (FSH 1909.12, 24 Exhibit 01 and 61.11). This analysis will occur later in the plan revision process. The statement, "In 2001, the Roadless Rule decreased the amount of area suitable for timber harvest to 135,000 acres, or roughly 10 percent of the Ashley National Forest. The remaining lands (approximately 1,265,000 acres) are classified as unsuitable for timber production due to factors such as steep slopes, lack of timber-producing vegetation types, or designated areas where harvesting timber is not in keeping with area resource objectives" was included in the draft assessment to explain one reason why it has been difficult for the Forest to average more than 5.7 million board feet over the last 10 years. However, there is enough context in the paragraph for this statement to be removed and still disclose the conditions and trends of wood product removal on the Forest.
Duchesne County Water Conservancy District, Clyde Watkins	Pg. 33, last paragraph, "Multiple use" needs to continue to be encouraged as a general Forest policy.	We are definitely striving to meet the intent of the 2012 Planning Rule and look for opportunities to encourage multiple use.
Duchesne County Water Conservancy District, Clyde Watkins	Pg. 36, Par. 1. We appreciate the draft report's acknowledgment that a large portion of any "potential" lynx habitat on the Ashley "is remote and receives little human-related impacts," also that any lynx population, if existing, is primarily "transient." Also the closing statement that "the current forest plan is generally adequate to sustain suitable habitat to support the species discussed."	Comment is noted. Thank you for your comment.
Duchesne County Water Conservancy District, Clyde Watkins	On pg. 43 under "Oil and Gas Development" we would suggest the closing statement "A worldwide drop in oil prices in 2014 brought most oil and gas development on the Ashley National Forest to a standstill" be amended to look to the future. The U.S. need for the security of home-produced oil and gas and a resurgence in production in the Uintah Basin can be anticipated. We support the 1997 Forest Service decision for oil and gas leasing on the Ashley and Uintah National Forests and would encourage its continuation in the future.	We have amended the assessment as requested.
Duchesne County Water Conservancy District, Clyde Watkins	the concept of "multiple use" is very beneficial to the health of the Uintah Basin economy. A balanced management policy that weighs all aspects of public needs ultimately a more beneficial public policy. DCWCW strongly supports Duchesne County's General Use policy which encourages "multiple use."	We are definitely striving to meet the intent of the 2012 Planning Rule and look for opportunities to encourage multiple use.
Duchesne County Water Conservancy District, Clyde Watkins	We appreciate the acknowledgment on pg. 53 that approximately 75% of the actual usage of the Ashley National Forest is by local users and would hope that comments by local users on the general forest plan be given a similar weight when arriving at management decisions for the Forest.	We hope that local forest users come to meetings, attend field trips and utilize all opportunities provided so they can have a strong voice in the planning process. We cannot favor one representative group over another but rarely do non-local forest users come to public meetings.
Duchesne County Water Conservancy District, Clyde Watkins	Pg. 53, Par. 6 & 7. We appreciate the recognition of changes in the preferred types of recreation on the forest since the 1986 forest plan and hope it will be reflected in the new forest plan.	The Recreation Technical Report discusses changing recreation uses and user competition in the Recreation Current Activities, Trends, and Conditions. The statement "competition for use of available land is increasing between motorized, non-motorized, and bicycle recreation users" has been added to the Recreation Opportunities, Designated Areas, Settings, and Access Technical Report summary section and the Ashley Assessment Recreation Opportunities, Designated Areas, Settings, and Access conclusions and future considerations.
Duchesne County Water Conservancy District, Clyde Watkins	pg. 58, Par. 6, the recognition that developed sites with universal accessibility are becoming increasingly more important on the Forest as the general population ages.	Campground infrastructure deferred maintenance, lack of funding, and increased demand is discussed in the Recreation Current Activity, Trends, and Conditions, Developed Recreation and Sustainable Recreation sections of the Recreation Technical Report. Current and past actions to keep campgrounds open and usable with declining budgets are also discussed in the Sustainable Recreation section of the Recreation Technical Report.
Duchesne County Water Conservancy District, Clyde Watkins	In regard to the statement (pg. 60) that horse and mule use has declined on the forest, many of the trails on the Forest are increasingly becoming more hazardous or at least difficult to travel for horses (and backpackers) because of fallen trees. We would suggest that discussion of a need for improving established back country trails and removing deadfall be included to facilitate horse usage. Many of the public, especially local residents, still greatly enjoy packing in or day rides with their horses so the more remote scenic areas are more easily accessible by horseback, especially for those whose age or handicaps preclude walking in. We would suggest that a goal of an active outreach program to recruit local youth and community groups to assist Forest Service personnel in the work of clearing trails would be beneficial to all. We commend the Back Country Horsemen of America for their political and physical efforts for trail maintenance even though the local chapter is small in number. Various other groups such as the Uinta Mountain Club, Boy Scouts, church groups and community clubs might also be approached and a general plan for trail cleanup formulated.	Even though the Ashley National Forest Recreation and Trails program is near capacity for volunteer projects the programs are always looking for additional volunteer opportunities and ways to increase volunteer capacity through an adopt a trail agreement or other programs. A statement to this effect has been added to the Recreation Opportunities, Designated Areas, Settings, and Access technical report in the opportunities for greater connection between people and nature section.
Duchesne County Water Conservancy District, Clyde Watkins	Pg. 61, We would encourage continued support for outfitter and guide activities as these benefit both the local economy and provide a way for older adults to experience the more remote Forest areas.	The Recreation Opportunities, Designated Areas, Settings, and Access technical report summary states that an outfitting and guiding needs assessment could help in identifying changes in the demand for outfitting and guiding activities and to address new potential outfitting and guiding activities that have developed over the past 20 years since the last assessment was completed.
Duchesne County Water Conservancy District, Clyde Watkins	Pg. 70-71, "People with Connections to the Ashley National Forests": We would encourage that all groups listed continue to have access to the forest for the various activities listed.	The National Forest System is owned by our US Citizens. As such, all citizens and visitors to this country are allowed to visit and utilize the many resources on National Forest lands.
Duchesne County Water Conservancy District, Clyde Watkins	Pg. 73, 79 & 80. We strongly support the statement that "Most typical ranches depend only partially on federal land grazing for forage; however, economic studies had shown that this forage source Æfill represent a critical part of their livestock operation, particularly as a summer forage source." We support "multiple use" policies as encouraged in the Duchesne County General Plan and the continued use of forest lands for grazing purposes.	The Ashley National Forest recognizes the economic, social, and cultural importance of livestock grazing to local communities. Additional language has been added to the cultural services discussion presented in the Draft Assessment, page 71, to note social and cultural contributions. 2014 total employment in the analysis area was about 65,000 jobs and \$4 billion in labor income. The economic contributions from FS activities on the Ashley NF, including from grazing, is less than 1% of the total employment in the economic analysis area. Therefore, the grazing contributions are not considered major economic contributions when compared to the economic conditions in the analysis area. The economic contributions estimated in the assessment report include direct, indirect, and induced impacts. The assessment is based on readily available information for rapid analysis. Additional baseline data and impacts analysis related to livestock grazing from proposed management will be considered and analyzed as appropriate for the EIS.
Duchesne County Water Conservancy District, Clyde Watkins	Pg. 74, Par. 1. This is an excellent statement as to the importance of the waters originating on forest lands. We strongly believe increased development of water storage on the forest is important to the public good. The manner in which these very important watershed areas are managed can greatly affect water yield, with the potential to impact both agricultural and culinary water users. As we are located in a historically drought-prone area of Utah, water yield is a highly critical piece of the Uintah Basin economy, also unimpeded Forest access is highly important to the water users organizations of Duchesne County.	Your comments are noted. The cited passages in the Draft Assessment Report (and additional sections in the Air, Soil and Watershed Resources technical report and the Socioeconomic technical report) recognize the importance water resources and healthy watersheds for the wide range of socio-economic and ecosystem services they provide. The current Forest Service Manual (FSM) states that timber harvest plans can be considered to increase water yields, but that such practices should only be implemented if "cost-effective, environmentally and scientifically feasible, and consistent with other resource uses and values." (U.S. Forest Service - FSM 2522.12). The Intermountain Region (Region 4) has further defined policy related to water yield management in a letter to all Forest Supervisors (U.S. Forest Service 2002), which emphasizes "optimal" water yield rather than "maximum" water yield. Optimum water yield implies healthy vegetative and aquatic ecosystems, which supply clean water for all beneficial uses of that water, both consumptive and non-consumptive.
Duchesne County Water Conservancy District, Clyde Watkins	We do have a concern that sufficient public awareness to the draft report and forest plan revision have been made. As stated on Page 5, Par. 5, "An ongoing goal for the Ashley National Forest is to increase public interest and participation during the planning period." We received an email notification (June 27, 2017) for the public meetings stating that the draft assessment report would be posted to the website after July 4, 2017 but it did not give a direct link. Our staff spent substantial time searching through all the various links on the Ashley National Forest website in order to find the draft report. We feel that was probably the experience for the general public who may have been unable to locate the report. We were not sure if any meeting notifications or articles were submitted to the Roosevelt and Vernal local papers for the general public? In contacting the Uintah Basin Standard their staff could not find a record of anything related to the draft report. In the future we would suggest that important planning documents such as this be made much more prominently accessible to the public in a variety of easily accessible ways.	The Ashley National Forest posted the documents on the website as soon as they were available on June 30, 2017 then started hosting public meetings on July 11, 2017. We continued hosting meetings until July 26th which would have been three weeks after release. The total comment period was more than 45 days, actually 50 days. The purpose for the meeting timing was to get hardcopies in the hands of anyone that was interested and unable to access them on the website or anyone that attended the meetings and desired a hardcopy. In this case the documents were provided to the public as soon as they were available, outreach for these meetings was completed using contacts with local and regional media sources and through the internal communication of collaborating agencies that are participating in this planning effort. In outreach for these meetings radio announcements ran in the Uintah Basin and in Wyoming. A legal notice was published in the Vernal Express the official paper of record for the Ashley National Forest and news releases were provided to a variety of other news agencies such as KSL and Deseret News in Salt Lake City, the Uintah Basin Standard in Roosevelt Utah, The Green River Star in Green River Wyoming and a host of other news outlets that included radio stations, television stations and newspapers and on our web and Facebook pages. The purpose of the meetings was to distribute the Draft Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest, not to actively seek feedback about the document from the public on the night of the meetings. It seems that the purpose of the meetings has been confused. The comment period for the Draft Assessment extended beyond the last meeting to provide time for the public to comment.
Duchesne County Water Conservancy District, Clyde Watkins	The email for the local Uintah Basin meetings sent on Saturday July 15, 2017, just three days prior to the start of local meetings on Tuesday, July 18, 2017, stated that written copies of the report would be delivered to the Vernal and Duchesne public libraries "on the same day as the public meeting for that town." We are concerned that given the large size of the printed report (108 pages) the public would not have an opportunity to read it thoroughly prior to the meeting that night, let alone even know that it was available. It seems in the best interest of the public to have documents available (and very well-advertised as such) in the public libraries at least a minimum of three to four weeks in advance. Also a copy of the report should have been available in the Roosevelt library too, not just Vernal and Duchesne.	The Ashley National Forest posted the documents on the website as soon as they were available on June 30, 2017 then started hosting public meetings on July 11, 2017. We continued hosting meetings until July 26th which would have been three weeks after release. The total comment period was more than 45 days, actually 50 days. The purpose for the meeting timing was to get hardcopies in the hands of anyone that was interested and unable to access them on the website or anyone that attended the meetings and desired a hardcopy. In this case the documents were provided to the public as soon as they were available, outreach for these meetings was completed using contacts with local and regional media sources and through the internal communication of collaborating agencies that are participating in this planning effort. In outreach for these meetings radio announcements ran in the Uintah Basin and in Wyoming. A legal notice was published in the Vernal Express the official paper of record for the Ashley National Forest and news releases were provided to a variety of other news agencies such as KSL and Deseret News in Salt Lake City, the Uintah Basin Standard in Roosevelt Utah, The Green River Star in Green River Wyoming and a host of other news outlets that included radio stations, television stations and newspapers and on our web and Facebook pages. The purpose of the meetings was to distribute the Draft Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest, not to actively seek feedback about the document from the public on the night of the meetings. It seems that the purpose of the meetings has been confused. The comment period for the Draft Assessment extended beyond the last meeting to provide time for the public to comment.
Duchesne County Water Conservancy District, Clyde Watkins	One of the public meetings was advertised as being held on the morning of July 1911 at the Ute Municipal Room in Ft. Duchesne from 9:30 a.m. till 11:30 a.m. DCWCW's staff arrived at 9:30 a.m. at that location to find that the public meeting had actually been cancelled apparently without any notification to the public. We feel that better efforts in communication need to be made in the future to give the public the opportunity to thoroughly review documents affecting them well in advance of public meetings. Email notifications are useful but not all the general public is included on the list. Articles in all local newspapers, not just the Vernal Express, also need to be well in advance of meetings if the goal is truly to "increase public interest and participation." Radio ads ran as public service announcements are also a useful medium for reaching the public who may not have access to email.	The Ashley National Forest posted the documents on the website as soon as they were available on June 30, 2017 then started hosting public meetings on July 11, 2017. We continued hosting meetings until July 26th which would have been three weeks after release. The total comment period was more than 45 days, actually 50 days. The purpose for the meeting timing was to get hardcopies in the hands of anyone that was interested and unable to access them on the website or anyone that attended the meetings and desired a hardcopy. In this case the documents were provided to the public as soon as they were available, outreach for these meetings was completed using contacts with local and regional media sources and through the internal communication of collaborating agencies that are participating in this planning effort. In outreach for these meetings radio announcements ran in the Uintah Basin and in Wyoming. A legal notice was published in the Vernal Express the official paper of record for the Ashley National Forest and news releases were provided to a variety of other news agencies such as KSL and Deseret News in Salt Lake City, the Uintah Basin Standard in Roosevelt Utah, The Green River Star in Green River Wyoming and a host of other news outlets that included radio stations, television stations and newspapers and on our web and Facebook pages. The purpose of the meetings was to distribute the Draft Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest, not to actively seek feedback about the document from the public on the night of the meetings. It seems that the purpose of the meetings has been confused. The comment period for the Draft Assessment extended beyond the last meeting to provide time for the public to comment.
Utah Farm Bureau Federation, Randy Parker	The importance of access to and use of the western public lands has been directly addressed by the President of the United States and should be an important consideration of the United States Forest Service (FS) as the federal agency revises and adopts the new Ashley Forest Plan [...]. President Donald Trump's Executive Order of April 25, 2017: "Promoting Agriculture and Rural Prosperity in America" directing Secretary of Agriculture Sonny Perdue provides clarity to the United States Forest Service to: Section 4 - (x) ensure that water users' private property rights are not encumbered when they attempt to secure permits to operate on public lands; (xiii) address hurdles associated with access to resources on public lands for the rural communities that rely on cattle (sheep) grazing, timber harvest, mining, recreation, and other multiple uses.	The Ashley National Forest recognizes the social and cultural importance of livestock grazing. Additional language has been added to the cultural services discussion presented in the Draft Assessment, page 71, to note these contributions.
Utah Farm Bureau Federation, Randy Parker	As the FS moves forward with their Ashley National Forest Plan Revision, it is duly noted that the agency has greater, more diverse demands on the resource. However, it is critically important to note that the dynamics of livestock production in Utah are equally dependent on or even more dependent on continued grazing rights, access to Forest System lands, the ability to develop and beneficially use the sovereign waters of the State of Utah to fully observe the Congressional multiple use management mandate. "The obligation of the FS under Land and Resource Management Plan Standards at Guidelines to "Provide forage to sustain local dependent livestock industry" (IV-36) is critical to sustaining the history, culture and economic contributions of sheep and cattle ranching families today as much as in 1986 when the current Forest Plan was adopted.	The Ashley National Forest recognizes the social and cultural importance of livestock grazing. Additional language has been added to the cultural services discussion presented in the Draft Assessment, page 71, to note these contributions.
Utah Farm Bureau Federation, Randy Parker	According to the "Draft Assessment Report" for the Ashley National Forest, the grazing AUMs reported from 1980 to 2016 have declined only slightly which has provided stability for local ranchers in a period of grazing uncertainty in Region 4. Based on the Draft Assessment Report on page 78 "If all permitted head months were grazed, it would support 162 jobs and \$3.5 million in labor income annually." This observation suggests there are still some factors, possibly uncertainty or market conditions among ranchers keeping grazing from full use.	Data have been corrected to show the total AUMs as 70,772. As noted in the footnote to Table 3, Draft assessment p 78, AUM data are variable. The AUM Data provided in the table represents levels in the database at the time information was viewed. Text has been modified to include that an approximate one percent change in overall permitted grazing has occurred. As noted in the draft assessment (p 78), there are a number of factors that could impact the gap between permitted and authorized grazing and achieving full use of the grazing availability, such as level and timing of precipitation. Project area specific information for this issue was not readily available at the assessment stage but the EIS may consider potential causes of this gap if it is related to the proposed action. Livestock numbers and season of use are managed at the allotment level based on long-term resource monitoring. Neither the assessment nor the revised forest plan will determine AUMs or the stocking level on an allotment.
Wyoming State Engineer Office, Beth Callaway	The Ashley National Forest Plan Revision team has communicated during several Cooperating Agency meetings that further detail will be provided regarding the evaluation of Wild and Scenic River segments for consideration under the Plan Revision. We recognize that this is still forthcoming and will be a work in progress. When or if any further analysis is anticipated, the WSEO requests to be involved with those discussions. This pertains especially if any new segments become under consideration that are located in Wyoming.	Like the wilderness evaluation field trips open to public and cooperating agencies we intend to offer similar opportunities on Wild & Scenic River evaluations. The timing is still being discussed.
Western Watersheds Project, Melissa Cain	The analysis resulting in the omission of bighorn sheep from the Ashley National Forest's Species of Conservation Concern list is based on misleading, outdated, or unsupported information. Bighorn sheep remain at substantial risk of extirpation on the Ashley, and species viability in the plan area is directly affected by Forest Service management actions. Western Watersheds Project asks that the Species of Conservation Concern list be amended to include bighorn sheep.	This is the assessment phase of Forest Plan Revision. Specific components, if needed, relating to management of bighorn sheep would be addressed in the next phase of the Forest Plan Revision process. A sentence was added to the assessment to acknowledge that bighorn sheep from the Uintas may travel into Wyoming. Because of regional concerns, and populations declines on the planning unit, bighorn sheep were reconsidered and included as a potential species of conservation concern for the Ashley Nation Forest.
Western Watersheds Project, Melissa Cain	"Range-wide bighorn sheep have increased from approximately 23,000 in 1960 to 73,000 in 2008. Statewide (Utah) the species have increased from a small remnant population in 1960 to over 4,600 in 2015." The timeline from which this trend is drawn results in a misleading characterization of the species's recovery status across the West. Researchers estimate the total Westwide population of bighorn sheep prior to European settlement at approximately 1.5-2 million. Therefore, the 23,000 wild sheep that remained by the 1960s represent survivors of a precipitous crash that eliminated all but the most isolated populations. While overhunting and forage competition contributed to this decline, it is believed that a primary factor in the loss of over 98% of bighorn sheep was pneumocyst pneumonia. Besser et al., 2012 states: "Bighorn sheep vanished from much of their historic range in North America during westward expansion in the early 20th century (Dice, 1919; Grinnell, 1928; Buechner, 1960). The precipitous decline in numbers, from 1.5-2 million in the 19th century to 15-18,000 in the United States by 1960 (Buechner, 1960) was not a unique phenomenon, as many other wildlife species' populations were similarly devastated during this era. However, the complete extirpation of bighorn sheep from much of their range, the slow rate of recovery despite intensive management efforts, and the recent listing of several U.S. populations as federally endangered (USFWS, 1998, 2000) sets them apart from most other North American ungulates. As with other species of wildlife, market hunting and competition with livestock for forage contributed to the decline of bighorn sheep (Spencer, 1943; Buechner, 1960). However, an unusual correlation between the introduction of domestic sheep (Ovis aries) and the rapid disappearance of bighorn sheep was noted by early investigators (Grinnell, 1928; Schillinger, 1937; Marsh, 1938). Pneumonia was recognized as an important cause of the decline by the turn of the 20th century, and remains the most significant disease impeding recovery (Rush, 1927; Buechner, 1960; Gross et al., 2000; Cassirer and Sinclair, 2007). Pneumonia outbreaks in previously healthy bighorn sheep populations typically affect all ages of animals, result in 80-90% mortality, and are nearly always followed by at least several years of annual pneumonia outbreaks restricted to lambs that dramatically reduce population growth (Spencer et al., 1984; Prudden et al., 1992; Cassirer et al., 1995; George et al., 2008). Sporadic or continuous pneumonia events can persist in both adults and lambs in interconnected populations for many years, limiting population growth at best and potentially leading to extinction at worst (Cassirer and Sinclair, 2007)." Bighorn sheep recovery since the 1960s reflects extensive restoration efforts and the continued contraction of the domestic sheep industry due to declining consumer demand, not a substantial increase in security from the known factors limiting bighorn sheep populations. Beginning in the 1950s, bighorn sheep herds were artificially reestablished in historic habitat through more than 1300 translocation operations, with thousands of hours and millions of dollars expended to bring bighorn sheep numbers to the current total of 73,000, just 4.8% of the presettlement population (WAFWA, 2015). As Rocky Mountain bighorns were essentially extirpated from the state by the late 1940s, all Rocky Mountain bighorn sheep herds in Utah are the result of such translocation efforts (UDWR, 2013). Herd reestablishment and augmentation has slowed as research into the causes of pneumonia in bighorn sheep have advanced. State wildlife agencies have become increasingly reluctant to reintroduce bighorn sheep in areas adjacent to those grazed by domestic sheep or to bighorn herds known to carry Mycoplasma or Pasteurella bacteria, due to the risk of disease related die-offs or conflicts with domestic sheep producers (NDOW, 2001) (UDWR, 2013) (MPFWP, 2010). Wildlife managers are therefore frequently unable to find areas of suitable habitat for further establishment of new herds (Kuglan, 2017). Even secure populations are limited from expansion due to fears of increasing the rate of contact with domestic sheep, as the likelihood of foray increases with bighorn population density. As a result, healthy populations of bighorn sheep are managed well below the carrying capacity of the landscape. In relying on statistics drawn from a period characterized by the unsustainable artificial growth of the species from a perilously small remnant population, the analysis avoids the implications of the true long term population trend of the species. Bighorns are currently at less than 5% of historic numbers, and further recovery will depend directly on decisions made by public land managers to reduce the risk of contact with domestic sheep and goats.	This is the assessment phase of Forest Plan Revision. Specific components, if needed, relating to management of bighorn sheep would be addressed in the next phase of the Forest Plan Revision process. A sentence was added to the assessment to acknowledge that bighorn sheep from the Uintas may travel into Wyoming. Because of regional concerns, and populations declines on the planning unit, bighorn sheep were reconsidered and included as a potential species of conservation concern for the Ashley Nation Forest.
Western Watersheds Project, Melissa Cain	"In the plan area, bighorn sheep have increased from a few scattered sightings in the 1960's to approximately 277 individuals in 2015." While healthy bighorn populations expand rapidly, die-offs may decimate a herd in weeks or months, with recruitment limited for years or decades to follow (NDOW, 2016). On the Rio Grande National Forest, 3 of 4 herds which underwent a disease event in the 1990's are acknowledged by the Forest Service as unlikely to ever recover: "On the Rio Grande National Forest, four bighorn sheep herds are still experiencing lingering effects of past pneumonia-related disease events dating back to the early to mid-1990s. Of the four herds, only one (S-36 Bellows Creek) is demonstrating slight recovery from a dramatic die-off 20 years ago. The other three herds (S-55 Camero Creek/Natural Arch, S-29 Namosa Canyon, and S-10 Trickle Mountain) are stagnant or continue to decline in numbers reaching the point of population persistence is unlikely (<30 animals) (Table 2). Numerous examples of bighorn sheep herds die-offs followed by lengthy periods of poor lamb recruitment due to exposure to domestic sheep are well documented in the literature (Forey 1990, Drew et al. 2014, George et al. 2008). Recovery rates can vary significantly depending upon the pathogen involved and other factors, and recovery can take decades to occur or possibly not occur at all (Besser et al. 2012)." (USFS, 2017b) Such events occur annually throughout the West (Howard, 2012).	This is the assessment phase of Forest Plan Revision. Specific components, if needed, relating to management of bighorn sheep would be addressed in the next phase of the Forest Plan Revision process. A sentence was added to the assessment to acknowledge that bighorn sheep from the Uintas may travel into Wyoming. Because of regional concerns, and populations declines on the planning unit, bighorn sheep were reconsidered and included as a potential species of conservation concern for the Ashley Nation Forest.
Western Watersheds Project, Melissa Cain	"Presently there is a disease event occurring within the five Uinta Mountain herds... this meta-population appears to be somewhat resilient to disease events and has persisted over time. This resiliency may be due in part to the augmentations that have occurred." Cassirer et al. 2017 found no evidence for cross-strain immunity to pathogens affecting bighorn sheep: those who had survived and recovered following exposure to one strain retained no immunity when exposed to another strain, and instead experienced morbidity and mortality rates similar to those of naive sheep. Multiple strains of the bacteria implicated in pneumonia epizootics may be found within a single flock of domestic sheep, demonstrating why separation is the only effective way to protect bighorns from pneumocyst pneumonia related die-offs (Harvey et al., 2007) (WAFWA, 2012).	This is the assessment phase of Forest Plan Revision. Specific components, if needed, relating to management of bighorn sheep would be addressed in the next phase of the Forest Plan Revision process. A sentence was added to the assessment to acknowledge that bighorn sheep from the Uintas may travel into Wyoming. Because of regional concerns, and populations declines on the planning unit, bighorn sheep were reconsidered and included as a potential species of conservation concern for the Ashley Nation Forest.
Western Watersheds Project, Melissa Cain	"Bighorn sheep are at risk of contact with domestic sheep both on and off the plan area. There are more lands adjacent to the plan area where domestic sheep may occur that overlap or are closer to the core herd home range than domestic sheep allotments on the plan area. Thus, this risk of contact/disease transmission on the plan area, may be less than the risk of contact off the plan area." That risks exist off the plan area is no justification for avoiding undertaking management practices on the plan area which would protect the species. This is ridiculous.	This is the assessment phase of Forest Plan Revision. Specific components, if needed, relating to management of bighorn sheep would be addressed in the next phase of the Forest Plan Revision process. A sentence was added to the assessment to acknowledge that bighorn sheep from the Uintas may travel into Wyoming. Because of regional concerns, and populations declines on the planning unit, bighorn sheep were reconsidered and included as a potential species of conservation concern for the Ashley Nation Forest.

Western Watersheds Project, Melissa Cain	"Multiple publications specific to bighorn sheep have outlined the minimum viable population estimate (MVPE) for long term population viability, most ranging from 100-250 individuals. UDWR currently uses 125 individuals for a minimum viable population estimate. The High Uintas's meta-population estimate is 177 individuals, which is within the range of 100-250 and above the UDWR's 125 minimum viable population." This commonly-cited estimate is based on a single publication which predated the understanding of polymicrobial pneumonia as the primary limiting factor in bighorn sheep recovery. Traill et al., 2010 relates that results from multiple studies of MVP for ungulates range from 1300 to 5800 individuals.	This is the assessment phase of Forest Plan Revision. Specific components, if needed, relating to management of bighorn sheep would be addressed in the next phase of the Forest Plan Revision process. A sentence was added to the assessment to acknowledge that bighorn sheep from the Uintas may travel into Wyoming. Because of regional concerns, and populations declines on the planning unit, bighorn sheep were reconsidered and included as a potential species of conservation concern for the Ashley National Forest.
Western Watersheds Project, Melissa Cain	"Bighorns have also persisted on planning unit through 23 years of hunting where 83 bighorn rams have been harvested in the Uintas's meta-population and two rams harvested off the Avintiquin population." The effective population for bighorn rams is extremely low (Frankham, 1995). Selective hunting pressure on older rams is unlikely to significantly impact all but the smallest bighorn populations.	This is the assessment phase of Forest Plan Revision. Specific components, if needed, relating to management of bighorn sheep would be addressed in the next phase of the Forest Plan Revision process. A sentence was added to the assessment to acknowledge that bighorn sheep from the Uintas may travel into Wyoming. Because of regional concerns, and populations declines on the planning unit, bighorn sheep were reconsidered and included as a potential species of conservation concern for the Ashley National Forest.
Western Watersheds Project, Melissa Cain	"Given this persistence and the upward trend on the planning unit, as well as State and range-wide, and the species S3 ranking not meeting the SCC criteria, there is not a substantial concern for this species in the planning area." Bighorn sheep were designated by the Regional Forester as a Sensitive Species in 2009, and since this time, no substantial progress has been made toward their recovery. They are no less susceptible to local extirpations, and no more secure in other areas within the region. Rationale for Species of Conservation Concern listing of desert bighorn sheep on the Inyo National Forest are as follows: "Future habitat loss due to warming temperatures and climate change is a threat, as is loss of genetic diversity. The most immediate and primary risk to Nelson's bighorn sheep persistence on the Inyo NF, however, is exposure to disease. The Forest limits this threat by restricting goat and sheep use in areas of the White Mountains which overlap with bighorn sheep within FS management authority, but has limited ability to mitigate co-mingling with diseased animals such as stray domestic sheep and goats from private properties, or animals from other bighorn herds in adjacent areas. Although disease may continue to be a latent threat, at this time there is no evidence of a decline in the Nelson's bighorn sheep population on the forest. Threats to the persistence of all desert bighorn sheep in California include disease transmission from domestic sheep and goats, competition with livestock, loss of genetic diversity due to isolation, habitat loss, and disturbance. Based upon the evidence, the Nelson's desert bighorn sheep indicates substantial concern about the species' capability to persist over the long term in the plan area. Based upon the evidence and supporting best available science, the Nelson's desert bighorn sheep does meet the established criteria at CFR 1909.12 chp. 10, 12.52 (c-d) as a species of conservation concern in the plan area. (USFS, 2017a) Identical conditions exist on the Ashley National Forest. While the precise epidemiological pathways of bighorn pneumonia are yet to be fully elucidated, there is adequate information leading to the determination of significant concern for species viability on the Ashley National Forest." * Following more than a half century of extensive restoration efforts, bighorn sheep remain at less than 5% of historic population estimates. * Diseases resulting from pathogens carried by domestic sheep and goats are the single greatest limiting factor to wild sheep recovery and persistence across the West. * Disease outbreaks following contact with a single domestic sheep may limit population growth for decades, or may lead to the complete extirpation of a herd. * Domestic sheep occur on and around the Ashley National Forest	This is the assessment phase of Forest Plan Revision. Specific components, if needed, relating to management of bighorn sheep would be addressed in the next phase of the Forest Plan Revision process. A sentence was added to the assessment to acknowledge that bighorn sheep from the Uintas may travel into Wyoming. Because of regional concerns, and populations declines on the planning unit, bighorn sheep were reconsidered and included as a potential species of conservation concern for the Ashley National Forest.
Western Resource Advocates, Joro Walker	In the Draft Assessment Report (DAR), the Forest Service states that "[c]ompared to many areas in the country, air quality in and near the Ashley National Forest and Flaming Gorge National Recreation area is good to excellent." DAR at 8. This statement is not correct. Initially, the Forest Service states: "The Ashley National Forest falls predominantly within four counties on the northern border of Utah and southern border of Wyoming: Daggett, Duchesne, and Uintah Counties in Utah, and Sweetwater County in Wyoming. A small portion of the Ashley lies within Utah, Wasatch, and Summit Counties in Utah." DAR at 2. Utah County, which is "in or near" the Ashley National Forest is a nonattainment area for the 24-hour fine particulate and PM10 NAAQS. 1. According to EPA, Uintah County, which is "in and near" the Ashley National Forest has a design value of 76 ppb of ozone based on 2012-2014 data. This means that the three year average of the 4th highest 8-hour monitored value for ozone was above both the 2008 and the 2015 8-hour ozone NAAQS. According to EPA, Duchesne County, which is also "in and near" the Ashley National Forest has a design value of 78 ppb of ozone based on 2012-2014 data. This means that the three year average of the 4th highest 8-hour monitored value for ozone was above both the 2008 and the 2015 ozone NAAQS. 2. Moreover, monitoring data shows that in 2016, the 4th highest 8-hour concentrations for ozone in Duchesne County were 81 ppb and 85 ppb as recorded at two different monitors. For Uintah County monitoring data from five different monitors recorded 4th highest concentrations of 73 ppb, 75ppb, 81 ppb and 96 ppb.3 These are alarmingly high 8-hour concentrations of ozone.	Pages 30-46 of the Air Soil and Watershed Resources technical report contain discussion on the multiple sources of air quality data and research. The technical report summarizes results and gives citations where data and published literature can be accessed. Page 12 of this technical report contains discussion on NAAQS and Forest Service conformity the Clean Air Act. Pages 47-48 of the technical report states currently no portions of the Ashley National Forest are in an area of nonattainment. There are nonattainment areas along the Wasatch Front, which is west and upwind of the Ashley National Forest. There is a concern with ozone in the Uintah Basin. This concern is being actively investigated by the Utah Air Quality Division (Uinta Basin Ozone Study). The concern may eventually lead to nonattainment status in a portion or all of the Uinta Basin. In the staff analysis informing Utah Governor Herbert's recommendations to the EPA for designations of nonattainment for the 2015 8-hr ozone National Ambient Air Quality Standards, 3 year design values (2013 to 2015) for Roosevelt and Myton monitoring sites are .075 and .074 ppb respectively. The 4 th maximum value for Roosevelt was as high as 0.104 ppb in 2013. The State of Utah's recommendations for nonattainment designation for Duchesne and Uintah counties are specifically limited to those townships that have 10% or greater of their area below 6000 feet in elevation, as the elevated winter-time ozone (and particulate readings) are associated with temperature inversions. Uinta Basin Ozone Study data from 2012-2013 demonstrates no influence from ozone transport or sources outside the inversion layer. During high ozone events in the Uinta Basin vertical profile data showed the highest concentrations confined to a shallow boundary layer 230 to 1300 feet above ground level. Driving transits across the Uinta Basin during high ozone events showed ozone decreasing to background levels by 2000 meters (~6500 ft). The reference will be added to statement in technical report regarding 6500 foot inversion levels. Utah Department of Environmental Quality. 2016. Utah Area Designation Recommendations for the 2015 8-hour Ozone National Ambient Air Quality Standard. 57 pages.
Western Resource Advocates, Joro Walker	Fine particulate matter is also a significant issue in Uintah and Duchesne counties. In 2017 and 2016 respectively, monitors recorded maximum concentrations for PM2.5 in Uintah County of 23.8 and 29.9 micro grams per cubic meter and in Duchesne County of 40.6 and 30 micro grams per cubic meter. The 98th percentile values over those same years for Uintah County were 21 and 25 and for Duchesne County 30 and 23 micro grams per cubic meter.4 While these values do not indicate a violation of the NAAQS, they represent degraded air quality and an issue of concern.	A discussion of fine particulate matter (PM 2.5 and PM 10) is included on page 30 of the Air, Soil and Watershed Resources technical report. Discussion of stationary, area, and mobile dust sources is contained on pages 30-32 of this report. Local sources of dust/pollution were considered. As stated on p 47, wildfire emissions, depending upon the year, can be a significant source of pollution within and around the Ashley National Forest. The emissions are not controllable by management except indirectly, through fire suppression and fuels management projects such as prescribed burning. Prescribed-fire emissions in the area do occur during the spring and late fall. Air quality impacts from other resource management activities, e.g., dust from logging roads and recreational use of system roads, are generally small and inconsequential. The impacts are not a concern at the forest planning level, but are considered and design features made at the project level.
Western Resource Advocates, Joro Walker	The Forest Service states: "The greatest threat to air quality on the Ashley is from human-generated sources outside the national forest." DAR at 9. However, the agency fails to consider that emissions from oil and gas development and other mineral development and the use of unpaved roads on the Forest is a considerable source of emissions. The Forest Service should acknowledge and attempt to quantify these emissions.	The 2014 National Emissions Inventory will be one of the newly available Air Quality datasets incorporated into future stages of Forest Plan revision.
Western Resource Advocates, Joro Walker	The Forest Service states: "The research suggests acidification of surface waters and forested ecosystems is not a concern, but deposition of nitrogen (both nitrates and ammonium) and phosphorus are. The deposition appears to be having an effect on sensitive high-elevation lake water chemistry and possibly aquatic organisms" DAR at 9. Water quality monitoring data should be provided. Moreover, the agency should indicate whether the beneficial uses of these lakes are being impaired and whether they should be listed on the 303(d) lists of impaired waters for Utah and Wyoming.	Newly updated (and EPA approved) State beneficial use designations and 303(d) listings will be incorporated into future stages of Forest Plan revision.
Western Resource Advocates, Joro Walker	The Forest Service states: Another potential concern is deposition of dust from off-Forest sources and its effects on high elevation lakes, water yield, and timing of flows." DAR at 9. First, the agency fails to consider local sources of dust such as that associated with the use of unpaved roads and routes, including in connection with oil and gas development.	A discussion of fine particulate matter (PM 2.5 and PM 10) is included on page 30 of the Air, Soil and Watershed Resources technical report. Discussion of stationary, area, and mobile dust sources is contained on pages 30-32 of this report. Local sources of dust/pollution were considered. As stated on p 47, wildfire emissions, depending upon the year, can be a significant source of pollution within and around the Ashley National Forest. The emissions are not controllable by management except indirectly, through fire suppression and fuels management projects such as prescribed burning. Prescribed-fire emissions in the area do occur during the spring and late fall. Air quality impacts from other resource management activities, e.g., dust from logging roads and recreational use of system roads, are generally small and inconsequential. The impacts are not a concern at the forest planning level, but are considered and design features made at the project level.
Western Resource Advocates, Joro Walker	An accurate understanding of air quality trends is critical to the Forest Plan revision process. Plainly, given the degraded quality of the airsheds encompassing and near the Ashley National Forest, the Forest Plan revision must include clear measures with real teeth sufficient to protect Forest values and resources from the adverse impacts of air pollution and to minimize emissions from activities on the Forest. Merely relying on past management direction or the actions of other agencies is not adequate to meet these goals. In listing "[c]urrent forest plan direction," DAR at 10, the Forest Service fails to exert adequate control over air pollution producing activities on the Forest. The agency cannot assume that state implementation processes and air quality permitting will secure compliance with the NAAQS and protect Forest air quality values and other resource values. For example, the PSD permitting program applies only to major sources and major modifications. The Clean Air Act fails to address cumulative emissions from minor sources, for example, from oil and gas development, because of the limited definition of source and other regulatory loopholes. As recent trends in ozone concentrations reveal, air quality can be degraded despite the permitting and other regulatory requirements. Therefore, the Forest Service itself must manage activities on the Forest to prevent or minimize emissions in the absence of and/or above and beyond any air quality permitting or state planning requirements. The Forest Service must reserve for itself the right and obligation to limit development activity, require pollution controls and otherwise minimize the emissions of air pollution from activities on the Forest.	Pages 30-46 of the Air Soil and Watershed Resources technical report contain discussion on the multiple sources of air quality data and research. The technical report summarizes results and gives citations where data and published literature can be accessed. Page 12 of this technical report contains discussion on NAAQS and Forest Service conformity the Clean Air Act. Pages 47-48 of the technical report states currently no portions of the Ashley National Forest are in an area of nonattainment. There are nonattainment areas along the Wasatch Front, which is west and upwind of the Ashley National Forest. There is a concern with ozone in the Uintah Basin. This concern is being actively investigated by the Utah Air Quality Division (Uinta Basin Ozone Study). The concern may eventually lead to nonattainment status in a portion or all of the Uinta Basin. In the staff analysis informing Utah Governor Herbert's recommendations to the EPA for designations of nonattainment for the 2015 8-hr ozone National Ambient Air Quality Standards, 3 year design values (2013 to 2015) for Roosevelt and Myton monitoring sites are .075 and .074 ppb respectively. The 4 th maximum value for Roosevelt was as high as 0.104 ppb in 2013. The State of Utah's recommendations for nonattainment designation for Duchesne and Uintah counties are specifically limited to those townships that have 10% or greater of their area below 6000 feet in elevation, as the elevated winter-time ozone (and particulate readings) are associated with temperature inversions. Uinta Basin Ozone Study data from 2012-2013 demonstrates no influence from ozone transport or sources outside the inversion layer. During high ozone events in the Uinta Basin vertical profile data showed the highest concentrations confined to a shallow boundary layer 230 to 1300 feet above ground level. Driving transits across the Uinta Basin during high ozone events showed ozone decreasing to background levels by 2000 meters (~6500 ft). The reference will be added to statement in technical report regarding 6500 foot inversion levels. Utah Department of Environmental Quality. 2016. Utah Area Designation Recommendations for the 2015 8-hour Ozone National Ambient Air Quality Standard. 57 pages.
Western Resource Advocates, Joro Walker	The Forest Service states that it "evaluated 107 watersheds to determine how well they are functioning in relation to water quality and quantity, channel function, aquatic and terrestrial habitat conditions[.]" DAR at 17. The agency should explain what percentage of the total number of watersheds 107 represents. Moreover, the assessment should describe the size of the watersheds, including those functioning at risk.	The process of Forest Plan revision is designed to identify current ecosystem conditions and trends, compare condition and trend to current Forest Plan guidance, identify needs for change and develop a new Forest Plan based on identified needs for change. The Ashley Assessment report and associated Soil, Air and Watershed resources technical report incorporate the US Forest Service watershed condition framework and its initial characterization for the Ashley National Forest, completed in 2011. Updates to the framework will continue to be used for forest planning for prioritizing restoration projects and promoting watershed health. The Air, Soil and Watershed Resources technical report (page 89), explains that the framework characterizes watersheds at the 6 th level hydrologic unit code scale. Watersheds containing five percent or more of National Forest System lands were rated within the framework. For the Ashley National Forest, 107 of the 1476 th level watersheds were characterized. Depictions of the watersheds and watersheds characterized in the framework are provided in Figures 41 - 50 in the appendix to the Air, Soil and Watershed Resources report. The area characterized in the 2011 Watershed Condition Framework represents approximately 99 percent of the Forest. Language will be added to the Draft Assessment report to clarify this.
Western Resource Advocates, Joro Walker	The Forest Service states: "Oil and gas development cause ground disturbance and potentially affect water flows and sediment delivery in streams[.]" DAR at 18. However, the agency fails to acknowledge that oil and gas development activity can and does contaminate surface and ground water beyond contributing to sedimentation.	The Air Soil and Watershed Resources technical report recognizes the potential for watershed effects from oil and gas activity (pages 85, 86, 99) and the importance of adequate soil and water conservation practices, also known as best management practices to mitigate effects, allowing for watershed protection.
Western Resource Advocates, Joro Walker	In its Assessment, the Forest Service does not reference any water quality monitoring data. The Forest Service fails to reference water quality standards of any sort. The Forest Service fails to provide any information on whether the streams and other water bodies on the Forest are meeting state water quality standards, whether the streams and other water bodies are listed as impaired on the Utah and/or Wyoming 303(d) lists of impaired waters.	Newly updated (and EPA approved) State beneficial use designations and 303(d) listings will be incorporated into future stages of Forest Plan revision.
Western Resource Advocates, Joro Walker	The Forest Service does not acknowledge the "Antidegradation Policy," see e.g. Utah Admin Code R317-2-3, which prohibits the degradation of high quality waters unless there is a finding, subject to public notice and comment, that "allowing lower water quality is necessary to accommodate important economic or social development in the area in which the waters are located[.]" Utah Admin Code R317-2-3.1. The Forest Service must have baseline water quality data in order to protect existing high water quality and comply with and enforce the antidegradation policy.	Newly updated (and EPA approved) State beneficial use designations and 303(d) listings will be incorporated into future stages of Forest Plan revision.
Western Resource Advocates, Joro Walker	The State of Utah has determined that all the streams and waters on the Forest are "of exceptional recreational or ecological significance or have been determined to be a State or National resource requiring protection" and that they "shall be maintained at existing high quality through designation, by the Board after public hearing, as Category 1 Waters." Utah Admin Code R317-2-3.2. Again, the Forest Service cannot comply with this mandate without baseline water quality data.	Newly updated (and EPA approved) State beneficial use designations and 303(d) listings will be incorporated into future stages of Forest Plan revision.
Western Resource Advocates, Joro Walker	The Forest Service is required to control "diffuse sources (nonpoint sources) of wastes[.]" to the extent feasible through implementation of best management practices or regulatory programs." Utah Admin Code R317-2-3.2; R317-2-12.1.a (defining Category 1 Waters). Yet, the agency admits that many activities on the Forest are adversely impacting water quality. DAR at 20 ("Although best management practices are used to protect water and watersheds, formal and informal monitoring indicates the practices are not always fully and properly implemented at the project level."). Thus, the Forest Service is duty bound to ensure all activities on the Forest are controlled "to the extent feasible" - either by BMPs or regulatory programs. Every management direction, guideline or standard addressing an activity with the potential to impact water quality must include an analysis to ensure that activity is controlled "to the extent feasible" to protect water quality and that this mandate is otherwise being enforced.	The process of Forest Plan revision will include this. A key function of the Forest Plan revision is to assess current conditions and trends of Forest resources (including aquatic resources), to identify needs for change in the existing Forest Plan, and develop a new Forest Plan based on identified needs for change.
Western Resource Advocates, Joro Walker	The Forest Service also neglects to provide real information on drinking water sources on the Forest. The agency does not mention whether any watersheds are protected by Drinking Water Source Protection Plans and if so, what those plans entail and whether these sources are adequately protected. This information must be combined with information on watershed condition, 303(d) impaired waters, water quality monitoring data and drinking water sources to give a complete picture of the condition of watersheds and the management direction necessary to protect watershed values and address any watersheds that are not properly functioning or not meeting their beneficial uses.	Drinking water systems are cited in the "Infrastructure" section of the Draft Assessment Report and described in greater detail in the corresponding Infrastructure technical report. Each of the 30 drinking water systems currently operated on the Ashley National Forest is tested monthly during their operational period to ensure they are meeting State drinking water standards.
Western Resource Advocates, Joro Walker	Maps should be provided that link layers such as watershed condition, water quality and drinking water source watersheds to roadless areas and other areas that could be further protected by management designations.	Newly updated (and EPA approved) State beneficial use designations and 303(d) listings will be incorporated into future stages of Forest Plan revision.
Western Resource Advocates, Joro Walker	The Forest Service fails to acknowledge the MOU among the USDA, DOI and EPA Regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions through the NEPA Process, which is relevant to the agency's adherence to its Clean Air Act and NEPA obligations.	The 2011 MOU between the EPA, the US Department of Agriculture and the Department of Interior provides a standardized collaborative approach to facilitate completion of NEPA analysis for Federal onshore oil and gas decisions and to mitigate adverse impacts to air quality and Air Quality Resource Values relating to oil and gas activities within the NEPA process. The MOU states that the Lead Agency will follow the procedures for environmental impact statements and ensure the procedures for environmental assessments. The MOU states that participating Agencies will strive to ensure to the maximum extent practicable, that Federal decisions relating to oil and gas will not cause or contribute to exceedences of the NAAQS, nor adversely impact AQRV's in Class I Areas, or sensitive Class II Areas. The MOU, while relevant to specific NEPA decisions regarding oil and gas development, was not cited in the Draft Assessment Report. In the Air, Soil and Watershed Resources technical report a description of the MOU has been added to the section on Regulatory Framework.
Western Resource Advocates, Joro Walker	The Forest Service states that "[t]he inversion ceiling typically levels out at approximately 6,500 feet, which is principally below the elevation of the Ashley National Forest acreage in the Uintah Basin," but provides no citation for this assertion. ASWRR at 29. This claim must be substantiated.	Pages 30-46 of the Air Soil and Watershed Resources technical report contain discussion on the multiple sources of air quality data and research. The technical report summarizes results and gives citations where data and published literature can be accessed. Page 12 of this technical report contains discussion on NAAQS and Forest Service conformity the Clean Air Act. Pages 47-48 of the technical report states currently no portions of the Ashley National Forest are in an area of nonattainment. There are nonattainment areas along the Wasatch Front, which is west and upwind of the Ashley National Forest. There is a concern with ozone in the Uintah Basin. This concern is being actively investigated by the Utah Air Quality Division (Uinta Basin Ozone Study). The concern may eventually lead to nonattainment status in a portion or all of the Uinta Basin. In the staff analysis informing Utah Governor Herbert's recommendations to the EPA for designations of nonattainment for the 2015 8-hr ozone National Ambient Air Quality Standards, 3 year design values (2013 to 2015) for Roosevelt and Myton monitoring sites are .075 and .074 ppb respectively. The 4 th maximum value for Roosevelt was as high as 0.104 ppb in 2013. The State of Utah's recommendations for nonattainment designation for Duchesne and Uintah counties are specifically limited to those townships that have 10% or greater of their area below 6000 feet in elevation, as the elevated winter-time ozone (and particulate readings) are associated with temperature inversions. Uinta Basin Ozone Study data from 2012-2013 demonstrates no influence from ozone transport or sources outside the inversion layer. During high ozone events in the Uinta Basin vertical profile data showed the highest concentrations confined to a shallow boundary layer 230 to 1300 feet above ground level. Driving transits across the Uinta Basin during high ozone events showed ozone decreasing to background levels by 2000 meters (~6500 ft). The reference will be added to statement in technical report regarding 6500 foot inversion levels. Utah Department of Environmental Quality. 2016. Utah Area Designation Recommendations for the 2015 8-hour Ozone National Ambient Air Quality Standard. 57 pages.
Western Resource Advocates, Joro Walker	The Forest Service states that "[t]he EPA national emissions inventory[.]" was queried for stationary sources of air pollution in and around the Ashley National Forest and Flaming Gorge National Recreation Area" and attempts to draw some conclusion from this information. ASWRR at 31. Without analysis, these conclusions are of minimal value. The Forest Service apparently ignores the significant sources of ozone (VOCs and NOx) and particulate matter (direct emissions of PM2.5 and PM10 and NOx, SO2, VOCs and ammonia) in the Uintah and Duchesne County airshed, which is immediately adjacent to and encompasses the Ashley National Forest. Moreover, information about sources of air emissions are of only limited value without modeling that considers factors such as distance, topography, changes in the chemistry of air pollution and meteorology.	Pages 30-46 of the Air Soil and Watershed Resources technical report contain discussion on the multiple sources of air quality data and research. The technical report summarizes results and gives citations where data and published literature can be accessed. Page 12 of this technical report contains discussion on NAAQS and Forest Service conformity the Clean Air Act. Pages 47-48 of the technical report states currently no portions of the Ashley National Forest are in an area of nonattainment. There are nonattainment areas along the Wasatch Front, which is west and upwind of the Ashley National Forest. There is a concern with ozone in the Uintah Basin. This concern is being actively investigated by the Utah Air Quality Division (Uinta Basin Ozone Study). The concern may eventually lead to nonattainment status in a portion or all of the Uinta Basin. In the staff analysis informing Utah Governor Herbert's recommendations to the EPA for designations of nonattainment for the 2015 8-hr ozone National Ambient Air Quality Standards, 3 year design values (2013 to 2015) for Roosevelt and Myton monitoring sites are .075 and .074 ppb respectively. The 4 th maximum value for Roosevelt was as high as 0.104 ppb in 2013. The State of Utah's recommendations for nonattainment designation for Duchesne and Uintah counties are specifically limited to those townships that have 10% or greater of their area below 6000 feet in elevation, as the elevated winter-time ozone (and particulate readings) are associated with temperature inversions. Uinta Basin Ozone Study data from 2012-2013 demonstrates no influence from ozone transport or sources outside the inversion layer. During high ozone events in the Uinta Basin vertical profile data showed the highest concentrations confined to a shallow boundary layer 230 to 1300 feet above ground level. Driving transits across the Uinta Basin during high ozone events showed ozone decreasing to background levels by 2000 meters (~6500 ft). The reference will be added to statement in technical report regarding 6500 foot inversion levels. Utah Department of Environmental Quality. 2016. Utah Area Designation Recommendations for the 2015 8-hour Ozone National Ambient Air Quality Standard. 57 pages.
Western Resource Advocates, Joro Walker	The Forest Service's discussion of dust fails to address the impact of dust on public health and does not consider dust generated locally, in late spring, summer and early fall - dust that does not fall on snow. See ASWRR at 32.	A discussion of fine particulate matter (PM 2.5 and PM 10) is included on page 30 of the Air, Soil and Watershed Resources technical report. Discussion of stationary, area, and mobile dust sources is contained on pages 30-32 of this report. Local sources of dust/pollution were considered. As stated on p 47, wildfire emissions, depending upon the year, can be a significant source of pollution within and around the Ashley National Forest. The emissions are not controllable by management except indirectly, through fire suppression and fuels management projects such as prescribed burning. Prescribed-fire emissions in the area do occur during the spring and late fall. Air quality impacts from other resource management activities, e.g., dust from logging roads and recreational use of system roads, are generally small and inconsequential. The impacts are not a concern at the forest planning level, but are considered and design features made at the project level.
Western Resource Advocates, Joro Walker	Figures 3 through 8 reference sources of various pollutants without explaining what the term "source" means. ASWRR at 34-37. Again, this information is of limited value without modeling or some indication of the significance of the sources. Moreover, these sources appear to be stationary sources and do not include the oil and gas development of the Uinta Basin or mobile or other area sources.	The 2014 National Emissions Inventory will be one of the newly available Air Quality datasets incorporated into future stages of Forest Plan revision.
Western Resource Advocates, Joro Walker	The Forest Service states "there is concern the Basin will be designated a nonattainment zone, requiring development of a State implementation plan." ASWRR at 40. This is likely incorrect, as it will be EPA that will develop and implement a federal implementation plan or FIP.	The Clean Air Act (42 U.S.C Section 7401) requires that federal standards be set to limit the maximum levels of pollutants in the outdoor air. Each state is responsible for developing plans to demonstrate how those standards will be achieved, maintained, and enforced. These plans make up the state implementation plan. The plans and rules associated with them are enforced by the State, and, after federal approval, they are also federally enforceable. These plans are the framework for each state's program to protect the air. https://deq.utah.gov/Laws_Rules/daq/sip/ Portions of the Uinta Basin within Indian Country would fall under the regulatory control of the tribes and the EPA. Text will be added to clarify this point. Figures 11-14 are graphics related to the Snopack Chemistry section of the technical report. Since 2007 the Ashley National Forest has funded annual snow chemistry surveys collected by the US Geological Survey. Discussion of figures 11-14 and the data collected in the snopack survey is found on pages 39-40 of the technical report. Text will be added to the figure captions for clarification on their source. Forestwide maps depicting critical load data in Table 5 are provided in the appendix to the Air Soil and Watershed Resources technical report. (See Figures 34 -40.)
Western Resource Advocates, Joro Walker	The Forest Service states a monitoring "site was located at Dutch John heliport near Flaming Gorge and was operated between 2010 and 2014. The results of the study indicate ozone was primarily in the mid-concentration range, rarely exceeding 100 parts per billion or dropping below 30 parts per billion." ASWRR at 41. The Forest Service should provide this monitoring data, along with the elevation of the monitor. In addition, the agency should explain what is meant by "mid-concentration range" and instead refer to the NAAQS.	Pages 30-46 of the Air Soil and Watershed Resources technical report contain discussion on the multiple sources of air quality data and research. The technical report summarizes results and gives citations where data and published literature can be accessed. Page 12 of this technical report contains discussion on NAAQS and Forest Service conformity the Clean Air Act. Pages 47-48 of the technical report states currently no portions of the Ashley National Forest are in an area of nonattainment. There are nonattainment areas along the Wasatch Front, which is west and upwind of the Ashley National Forest. There is a concern with ozone in the Uintah Basin. This concern is being actively investigated by the Utah Air Quality Division (Uinta Basin Ozone Study). The concern may eventually lead to nonattainment status in a portion or all of the Uinta Basin. In the staff analysis informing Utah Governor Herbert's recommendations to the EPA for designations of nonattainment for the 2015 8-hr ozone National Ambient Air Quality Standards, 3 year design values (2013 to 2015) for Roosevelt and Myton monitoring sites are .075 and .074 ppb respectively. The 4 th maximum value for Roosevelt was as high as 0.104 ppb in 2013. The State of Utah's recommendations for nonattainment designation for Duchesne and Uintah counties are specifically limited to those townships that have 10% or greater of their area below 6000 feet in elevation, as the elevated winter-time ozone (and particulate readings) are associated with temperature inversions. Uinta Basin Ozone Study data from 2012-2013 demonstrates no influence from ozone transport or sources outside the inversion layer. During high ozone events in the Uinta Basin vertical profile data showed the highest concentrations confined to a shallow boundary layer 230 to 1300 feet above ground level. Driving transits across the Uinta Basin during high ozone events showed ozone decreasing to background levels by 2000 meters (~6500 ft). The reference will be added to statement in technical report regarding 6500 foot inversion levels. Utah Department of Environmental Quality. 2016. Utah Area Designation Recommendations for the 2015 8-hour Ozone National Ambient Air Quality Standard. 57 pages.
Western Resource Advocates, Joro Walker	The Report fails to explain figures 11-14 or suggest what a baseline concentration of these pollutants is.	The Clean Air Act (42 U.S.C Section 7401) requires that federal standards be set to limit the maximum levels of pollutants in the outdoor air. Each state is responsible for developing plans to demonstrate how those standards will be achieved, maintained, and enforced. These plans make up the state implementation plan. The plans and rules associated with them are enforced by the State, and, after federal approval, they are also federally enforceable. These plans are the framework for each state's program to protect the air. https://deq.utah.gov/Laws_Rules/daq/sip/ Portions of the Uinta Basin within Indian Country would fall under the regulatory control of the tribes and the EPA. Text will be added to clarify this point. Figures 11-14 are graphics related to the Snopack Chemistry section of the technical report. Since 2007 the Ashley National Forest has funded annual snow chemistry surveys collected by the US Geological Survey. Discussion of figures 11-14 and the data collected in the snopack survey is found on pages 39-40 of the technical report. Text will be added to the figure captions for clarification on their source. Forestwide maps depicting critical load data in Table 5 are provided in the appendix to the Air Soil and Watershed Resources technical report. (See Figures 34 -40.)
Western Resource Advocates, Joro Walker	A map showing the information in Table 5 by location would be helpful.	The Clean Air Act (42 U.S.C Section 7401) requires that federal standards be set to limit the maximum levels of pollutants in the outdoor air. Each state is responsible for developing plans to demonstrate how those standards will be achieved, maintained, and enforced. These plans make up the state implementation plan. The plans and rules associated with them are enforced by the State, and, after federal approval, they are also federally enforceable. These plans are the framework for each state's program to protect the air. https://deq.utah.gov/Laws_Rules/daq/sip/ Portions of the Uinta Basin within Indian Country would fall under the regulatory control of the tribes and the EPA. Text will be added to clarify this point. Figures 11-14 are graphics related to the Snopack Chemistry section of the technical report. Since 2007 the Ashley National Forest has funded annual snow chemistry surveys collected by the US Geological Survey. Discussion of figures 11-14 and the data collected in the snopack survey is found on pages 39-40 of the technical report. Text will be added to the figure captions for clarification on their source. Forestwide maps depicting critical load data in Table 5 are provided in the appendix to the Air Soil and Watershed Resources technical report. (See Figures 34 -40.)

Western Resource Advocates, Joro Walker	The Forest Service states: the "Ashley National Forest is in conformance with current national ambient air quality standards." ASWRR at 47. The agency should provide air quality monitoring data to support this claim. For example, the agency should determine whether air quality in the South Unit oil and gas development fields is complying with the NAAQS. Without monitoring data, such a claim cannot be substantiated.	Pages 30-46 of the Air Soil and Watershed Resources technical report contain discussion on the multiple sources of air quality data and research. The technical report summarizes results and gives citations where data and published literature can be accessed. Page 12 of this technical report contains discussion on NAAQS and Forest Service conformity the Clean Air Act. Pages 47-48 of the technical report states currently no portions of the Ashley National Forest are in an area of nonattainment. There are nonattainment areas along the Wasatch Front, which is west and upwind of the Ashley National Forest. There is a concern with ozone in the Uintah Basin. This concern is being actively investigated by the Utah Air Quality Division (Uintah Basin Ozone Study). The concern may eventually lead to nonattainment status in a portion or all of the Uintah Basin. In the staff analysis informing Utah Governor Herbert's recommendations to the EPA for designations of nonattainment for the 2015 8-hr ozone National Ambient Air Quality Standards, 3 year design values (2013 to 2015) for Roosevelt and Myton monitoring sites are .075 and .074 ppb respectively. The 4th maximum value for Roosevelt was as high as 0.104 ppb in 2013. The State of Utah's recommendations for nonattainment designation for Duchesne and Uintah counties are specifically limited to those townships that have 10% or greater of their area below 6000 feet in elevation, as the elevated winter-time ozone (and particulate readings) are associated with temperature inversions. Uintah Basin Ozone Study data from 2012-2013 demonstrates no influence from ozone transport or sources outside the inversion layer. During high ozone events in the Uintah Basin vertical profile data showed the highest concentrations confined to a shallow boundary layer 230 to 1300 feet above ground level. Driving transits across the Uintah Basin during high ozone events showed ozone decreasing to background levels by 2000 meters (~6500 ft). The reference will be added to statement in technical report regarding 6500 foot inversion levels. Utah Department of Environmental Quality. 2016. Utah Area Designation Recommendations for the 2015 8-hour Ozone National Ambient Air Quality Standard. 57 pages.
Western Resource Advocates, Joro Walker	The Forest Service mentions that the Ashley contains sources of drinking water and claims that this information is not open to the public. ASWRR at 85. However, the Forest Service can determine the condition of these sources and the protections afforded them and determine whether additional management safeguards are necessary all publicly and all without revealing the location of these sources. Moreover, if the agency is going to claim that critical information may not be disclosed to the public, the agency should provide citation for this assertion and construe it narrowly so as to avoid impairing opportunities for meaningful public participation in the forest planning process.	Drinking water systems are cited in the "infrastructure" section of the Draft Assessment Report and described in greater detail in the corresponding Infrastructure technical report. Each of the 30 drinking water systems currently operated on the Ashley National Forest is tested monthly during their operational period to ensure they are meeting State drinking water standards.
Western Resource Advocates, Joro Walker	The Forest Service mentions Utah's Integrated Reports but fails to identify waters on the Ashley that are not meeting their beneficial uses. ASWRR at 86-87. The Forest Service fails to provide any information on whether the streams and other water bodies on the Forest are meeting state water quality standards, whether the streams and other water bodies are listed as impaired on the Utah and/or Wyoming 303(d) lists of impaired waters.	Newly updated (and EPA approved) State beneficial use designations and 303(d) listings will be incorporated into future stages of Forest Plan revision.
Western Resource Advocates, Joro Walker	The Forest Service mentions 303(d) listing as being a factor in determining watershed condition, ASWRR at 98, but fails to map these impaired waters, explain how this impairment is considered in the overall assessment and fails to draw the connection, if any, between impaired uses and other watershed conditions such as road proximity, road maintenance, oil and gas development, livestock grazing and riparian vegetation condition.	Newly updated (and EPA approved) State beneficial use designations and 303(d) listings will be incorporated into future stages of Forest Plan revision.
Western Resource Advocates, Joro Walker	Initially, it is almost impossible to understand exactly what to comment on and when relative to the draft list of species of conservation concern (SCC). The Species at Risk Assessment makes little to no attempt to connect the rationale for the proposed SCC designations to the sources. There is no real explanation for the decision to leave species off the SCC list. The Forest Service does not provide lists of sources used and therefore fails to meet the BAFI standard. Mover, clear connections between the rationale and sources used has not been established. Establishing a clear connection between a data source and inferences derived from the data source is a standard in virtually all fields of science. Due to the lack of a clear connection between the rationale and the sources used, we are unable to confirm if the entirety of the rationale is attributable to the sources used, and which data source is attributable to which portion of the rationale. Furthermore, the rationales very often appear not to accurately reflect the sources cited. For these reasons, we believe the best available scientific information (BAISI) on which the SCC determinations have been made has not been established. By failing to document how the best available scientific information was used to inform the assessment or any aspect of the draft SCC list, there is no basis to support that the currently existing SCC lists were developed using BAFI.	The Forest followed the 2012 Forest Planning direction for criteria when identifying potential Species of Conservation Concern (FSH 1919.12 Chapter 10, section 12.52. These criteria, while not the only information that was used, can be summed up as follows. Is the species native to the planning unit or not? What is the Global and State status of each species? In the past 20 years, how many occurrences and what year was the last occurrence for each species on the planning unit? Are the species occurrences accidental or transient on the planning unit? Is the species established or becoming established on the planning unit? What is the distribution, abundance, and trend of the species on the planning unit? What threats and risks does the species face on the planning unit? What habitat requirement does the species have? Is there substantial concern for this species to persist on the planning unit?
Western Resource Advocates, Joro Walker	The rationales for the proposed SCC designations are vague and inconsistent. The most widespread of these inconsistencies occurs when a specific NatureServe ranking is used to deem one species not worthy of SCC designation and the same NatureServe ranking is used to deem another species worthy. Because NatureServe rankings may not be applicable to the plan area, NatureServe ranking should not be used as the sole rationale for SCC determinations. We also suggest that NatureServe rankings be used consistently from species to species and rationale to rationale. We ask that the logic used to develop each rationale for inclusion or exclusion be consistent, fully described, and done in furtherance of species' conservation as discussed below.	The Forest followed the 2012 Forest Planning direction for criteria when identifying potential Species of Conservation Concern (FSH 1919.12 Chapter 10, section 12.52. These criteria, while not the only information that was used, can be summed up as follows. Is the species native to the planning unit or not? What is the Global and State status of each species? In the past 20 years, how many occurrences and what year was the last occurrence for each species on the planning unit? Are the species occurrences accidental or transient on the planning unit? Is the species established or becoming established on the planning unit? What is the distribution, abundance, and trend of the species on the planning unit? What threats and risks does the species face on the planning unit? What habitat requirement does the species have? Is there substantial concern for this species to persist on the planning unit?
Western Resource Advocates, Joro Walker	We have identified numerous species that are critically imperiled, imperiled, vulnerable, or are species currently on the Regional Forester's Sensitive Species (RFSS) list, yet they have been excluded from the SCC list. We believe these species should be included on the SCC list due to their vulnerability and the risk to their persistence in the plan area. It is not possible to determine why the Forest Service made the decisions it did. Therefore, it is not possible to apply that criteria to species we believe should be on the SCC. Furthermore, the ongoing concern about the conservation status for these species, as demonstrated by the NatureServe ranks, and other information, demands a higher burden of proof from the Forest Service to demonstrate why such species should not be included on the SCC list. The "rationales" presently lack science-based evidence and a coherent statement to establish why these species should not be included on the SCC lists. The "substantial concern" standard is being misapplied and the result is that species have been wrongly excluded from the SCC list. The goal of SCC designation is, in part, to prevent the need for the listing of species under the ESA. As the Forest Service has put it, "[w]e create an SCC list using the best available science in a proactive step intended to prevent species from becoming federally listed." ("Species of Conservation Concern Frequently Asked Questions" (July 2015)). The Forest Service has also acknowledged that "the goal of [the SCC and Sensitive Species] lists is to prevent species from being federally listed as threatened or endangered," and that the SCC list, as compared to the Sensitive Species list that currently exists, "has more comprehensive and defined criteria... making it less likely that a species in need of help will be overlooked." ("Species of Conservation Concern Frequently Asked Questions" (July 2015)) Unfortunately, the opposite is occurring with the draft SCC list, as many species, including a number of species that currently are considered "sensitive," are being overlooked. "[Substantial concern" is defined by the Forest Service as "credible evidence that there is a concern about a particular species' ability to persist within the forest." ("Species of Conservation Concern Frequently Asked Questions" (July 2015)) Such "evidence" includes (i) "species has been identified as imperiled as a result of status reviews described in the scientific literature and listed in widely accepted databases such as NatureServe, a nonprofit organization that provides proprietary wildlife conservation-related data, tools, and services," (ii) "[s]ignificant threats, such as climate change or competition from exotic species," (iii) "[f]ield surveys have documented declining SCC populations or habitat in the forest plan area," or (iv) "the species is known to have low population numbers or restricted habitat within the forest plan area." ("Species of Conservation Concern Frequently Asked Questions" (July 2015)) Similarly, several species that are currently recognized on the Regional Forester Sensitive Species (RFSS) list are not being designated "SCC" despite the concern the data shows for them.	The Forest followed the 2012 Forest Planning direction for criteria when identifying potential Species of Conservation Concern (FSH 1919.12 Chapter 10, section 12.52. These criteria, while not the only information that was used, can be summed up as follows. Is the species native to the planning unit or not? What is the Global and State status of each species? In the past 20 years, how many occurrences and what year was the last occurrence for each species on the planning unit? Are the species occurrences accidental or transient on the planning unit? Is the species established or becoming established on the planning unit? What is the distribution, abundance, and trend of the species on the planning unit? What threats and risks does the species face on the planning unit? What habitat requirement does the species have? Is there substantial concern for this species to persist on the planning unit?
Western Resource Advocates, Joro Walker	Not only are "Sensitive" species being wrongly denied SCC status, thus far, it also appears that the SCC process is essentially using an ESA listing standard to determine whether a species should receive SCC designation. This is despite the fact, as noted above, that the Forest Service has acknowledged that the intent of SCC status is to help avoid ESA listing. "Substantial concern" is a lesser standard than ESA "warranted" and, moreover, ESA listed and ESA candidate species are addressed separately from SCC under the 2012 Planning Rule.	The Forest followed the 2012 Forest Planning direction for criteria when identifying potential Species of Conservation Concern (FSH 1919.12 Chapter 10, section 12.52. These criteria, while not the only information that was used, can be summed up as follows. Is the species native to the planning unit or not? What is the Global and State status of each species? In the past 20 years, how many occurrences and what year was the last occurrence for each species on the planning unit? Are the species occurrences accidental or transient on the planning unit? Is the species established or becoming established on the planning unit? What is the distribution, abundance, and trend of the species on the planning unit? What threats and risks does the species face on the planning unit? What habitat requirement does the species have? Is there substantial concern for this species to persist on the planning unit?
Western Resource Advocates, Joro Walker	Providing a connection between specific threats and the rationale for designation is especially important because to date little to no information on dependent ecological conditions or threats has been provided for each species. Defining the specific ecological conditions on which each potential SCC depends is an essential first step to a rationale that supports a conclusion that there is or is not a substantial concern about species viability within the plan area. Once the ecological conditions on which the species depend have been defined, the logical next step is to identify the specific threats acting on the dependent ecological conditions within the plan area. Only after the specific threats to the ecological conditions on which the species depends have been defined can a defensible SCC rationale be developed. The primary purpose of the forest assessments as they relate to SCC is to define the ecological conditions on which the species depends and the specific threats to those ecological conditions within the plan area. There is essentially no basis for the negative determinations for some species on the draft SCC list. This makes commenting on the draft list and the species that "did not appear to meet the SCC criteria" almost impossible.	The Forest followed the 2012 Forest Planning direction for criteria when identifying potential Species of Conservation Concern (FSH 1919.12 Chapter 10, section 12.52. These criteria, while not the only information that was used, can be summed up as follows. Is the species native to the planning unit or not? What is the Global and State status of each species? In the past 20 years, how many occurrences and what year was the last occurrence for each species on the planning unit? Are the species occurrences accidental or transient on the planning unit? Is the species established or becoming established on the planning unit? What is the distribution, abundance, and trend of the species on the planning unit? What threats and risks does the species face on the planning unit? What habitat requirement does the species have? Is there substantial concern for this species to persist on the planning unit?
Western Resource Advocates, Joro Walker	To the extent the Forest Service did so, reliance on current or future management is inappropriate for several reasons. First, if it is known that an at-risk species requires certain management to reverse trends and provide stability then it should be on the list to ensure that these needs are addressed in the development of plan components. Second, future management direction is speculative at this point. The purpose of the SCC list is to use it to develop plan components so that at-risk species are adequately covered in the forest plan. Lastly, an at-risk species will only be evaluated in the development of the forest plan if it is included on the SCC list or is a federally designated species. There is no other role for at-risk species in the development of a forest plan. For at-risk species with known threats due to actions regulated by the forest plan SCC designation is necessary to ensure that plan components maintain the ecological conditions on which the species depend and to provide for viable populations in the plan area.	The Forest followed the 2012 Forest Planning direction for criteria when identifying potential Species of Conservation Concern (FSH 1919.12 Chapter 10, section 12.52. These criteria, while not the only information that was used, can be summed up as follows. Is the species native to the planning unit or not? What is the Global and State status of each species? In the past 20 years, how many occurrences and what year was the last occurrence for each species on the planning unit? Are the species occurrences accidental or transient on the planning unit? Is the species established or becoming established on the planning unit? What is the distribution, abundance, and trend of the species on the planning unit? What threats and risks does the species face on the planning unit? What habitat requirement does the species have? Is there substantial concern for this species to persist on the planning unit?
Western Resource Advocates, Joro Walker	There are several species included on the Regional Forester Sensitive Species that have not been designated as SCC. We find no basis for these omissions since the Forest Service has stated in the 2012 planning rule that RFSS are similar to SCC: RFSS are those plant and animal species identified by a regional forester for which population viability is a concern, as evidenced by: significant current or predicted downward trends in population numbers or density or significant current or predicted downward trends in habitat capability that would reduce a species' existing distribution. RFSS are thus similar to species of conservation concern. We do recognize that SCC serve a different functional role in the forest plan revision process compared to the RFSS. 77 Fed. Reg. 21175. Furthermore, the purpose of both the RFSS and SCC approaches is to land management is to prevent the federal listing of at-risk species. We also find that the criteria to define RFSS and SCC are essentially the same. Thus, we expect that those species designated on the recently revised RFSS list should be included on the SCC list, yet they are not. All RFSS and especially those for which the current forest plan specifically include conservation measures to address species persistence, should be included on the SCC list for these forests.	The Wyoming Game and Fish Department sent a letter requesting we consider certain species. These species were evaluated during the SOCC evaluation process. The 2012 Planning Rule 36 CFR 219.9 and FSH 1909.12.52 does not require that FS sensitive species under the old planning rule be selected as species of conservation concern (SOCC). However, all R4 Forest Service sensitive species that were designated by the Regional Forester during the old planning rule that occur on the Ashley NF were considered and evaluated for potential SOCC. Four of the six species on the potential list of SOCC were sensitive species under the old planning rule.
Western Resource Advocates, Joro Walker	Utah and Wyoming maintain lists of "Special Status Species" for both plants and animals that recognize the species designations of other agencies and identify their own "Species of Special Concern." While the draft SCC tables recognize the rankings assigned by Utah and Wyoming, these rankings seem to be disregarded, there is no rationale for not including these species as SCC and there is no connection between the ranking and the SCC list. We believe these rankings should influence the inclusion of species on the SCC lists.	The Forest followed the 2012 Forest Planning direction for criteria when identifying potential Species of Conservation Concern (FSH 1919.12 Chapter 10, section 12.52. These criteria, while not the only information that was used, can be summed up as follows. Is the species native to the planning unit or not? What is the Global and State status of each species? In the past 20 years, how many occurrences and what year was the last occurrence for each species on the planning unit? Are the species occurrences accidental or transient on the planning unit? Is the species established or becoming established on the planning unit? What is the distribution, abundance, and trend of the species on the planning unit? What threats and risks does the species face on the planning unit? What habitat requirement does the species have? Is there substantial concern for this species to persist on the planning unit?
Western Resource Advocates, Joro Walker	We believe the Forest Service should reconsider the eligibility of Ashley Creek or segments of the creek. The Ashley has several outstanding remarkable values. Fish and Wildlife: The South Fork of the Ashley flows through the Sims Peak Potholes, designated a RMA to preserve its pristine nature. The Forest Service also intends to or has designated the Ashley Gorge as RMA. Scenic: Undammed and undiverted for its entire 24 mile length, of the South Fork and meanders of the Ashley represent one of the most picturesque and yet undeveloped drainage in the Uintas. The headwaters of the South Fork begin in glacially scoured terrain and descend a broad U-shaped valley where the creek meanders through lush meadows and wildflower. Mountain ridges reach 12,400 feet and rim the upper basin. Farther downstream, the South Fork flows through stands of Doug fir and lodgepole pine. The nearby Sims Peak Potholes are hundreds of water-containing divots left behind by the Ashley Glacier of the last Ice Age. Geologic: The South Fork drainage illustrates the work of the Ashley Glacier which laid within the Lakeshore Basin during the last Ice Age. The broad glacial moraine can be seen distinctly in the heavily forested area southeast of the basin and in the Sims Peak Pothole country. Much of the Ashley Gorge is carved in Weber Sandstone, but in the steep upper reaches of the gorge, the creek has carved through the much older Black Shale unit of the Pennsylvanian epoch. The upper Morgan, Hells Canyon and Tound Valley layers of the Morgan Formation can also be seen here and throughout the lower reaches of the canyon.	The draft assessment identifies designated areas established within the plan area in the Recreation Opportunities and Scenery section under Designated and Special Areas. The Recreation Opportunities and Settings, and Access Report also discusses Important Designated Areas, Recreational Sites, and Other Areas. The Recreation Opportunities and Settings, and Access Report will be updated under the Important Designated Areas, Recreational Sites, and Other Areas section to include a discussion regarding proposals for designated areas that are currently being proposed by collaborative groups. The draft assessment describes rare habitat types and ecosystems that could be considered as designated areas. These ecosystems are described in the Assessing Terrestrial and Aquatic Ecosystems section under Rare Habitat Types. These ecosystems were described because they are believed to be minimally represented in the planning area and could potentially be considered as designated areas and evaluated in the EIS analysis.
C.E. Brooks & Associates, P.C., Cody Doig	The Coalition has provided feedback on every individual report as requested by the Forest Service. Upon review of the Draft Assessment reports posted August 7, 2017, it is clear that the Forest Service has not accepted any of the recommendations made by the Coalition. The same figures are presented within the same narratives. The Coalition provided material and substantive comments which the Forest Service must address. 40 C.F.R. § 1509.4(a); Utah's for Better Transp. v. U.S. Dept of Transp., 305 F.3d 1152, 1165 (10th Cir. 2002), as modified on reh'g, 319 F.3d 1207 (10th Cir. 2003). More importantly, no justification has been offered for the lack of any change or response. For example, the Coalition commented on the Wildland Fire report that the departure rate from historical ranges of variation for various types of vegetation was vastly different than those indicated by the Terrestrial Report. The Coalition commented that 90% of the mixed conifer type has a departure rate from historical range of variation of greater than 34% according to the Wildland Fire report, but the Terrestrial Report contains no hard data or percentages that can be said to mirror the Wildland Fire report. The Forest Service must ensure that each report supports the others. The baseline is dependent on a single, coherent assessment.	Improvements are being made to the organization of information in the Assessment Report and to the Technical Reports that we hope will help with cross-referencing. Before the public reviewed and submitted comments the cooperating agencies and the USFS Regional Office were given a chance to review the Technical Report portion of the Assessment. All of those comments were reviewed and appropriately responded to with many corrections made. Comments that were statements of opinions and not referencing new scientific findings or data - may not have received a response. We are directed to produce a rapid assessment of scientific information on conditions and trends for the assessment and we were at 800 pages doing this with the technical reports.
C.E. Brooks & Associates, P.C., Cody Doig	The Ashley National Forest is in an admittedly dire state. Watershed health, tree mortality, and species diversity all indicate that the Forest Service is not following basic objectives of federal law, particularly the Healthy Forest Restoration Act, 16 U.S.C. §6501-6591. A comparison of the 2017 assessment report with the one prepared by the ANF in 2009 shows that current management has failed to address the risks. As a result the disease and dead at risk standards have increased. Compare 2009 Assessment 4.7.4-4.7.27 with 2017 Assessment at 25-26 (admitting inability to remove dead timber). The Draft Assessment should, at a minimum, identify the obligation to maintain and restore forest health as part of its definition of the baseline inventory before proceeding to further planning. These objectives define the information needed for an direction, provide context to the on-the-ground issues, and set the stage for the next step, which is identifying the actions needed to achieve the statutory and biological objectives. At this point, the Draft Assessment leaves out a major component of the problem to be resolved - the regulatory framework and the statutory mandates that each forest must meet.	The Ashley National Forest has used Healthy Forest Restoration Act authorities to complete projects to protect watersheds and address threats to forest and rangeland health, including catastrophic wildfire. The HFRA authorities sometimes help to streamline the implementation of projects to protect watersheds, but they do not eliminate all other statutory requirements. Specifically, 16 U.S.C. Code §6555 states: The authority provided to each Secretary under this subchapter is supplemental to, and not in lieu of, any authority provided to the Secretaries under any other law. The Ashley National Forest has actively attempted to salvage trees killed by wildfire and insect attacks. Page 25 of the Assessment merely indicates salvage harvest have been limited by infrastructure and timber markets; economic constraints and purchaser capacity are a reality limiting the amount of salvage harvesting that has occurred. Salvage harvesting is a reactive form of management; an over-emphasis on salvage harvesting could jeopardize the Forest's ability to complete the proactive treatments required to prevent catastrophic wildfires and insect outbreaks in the first place. Additionally, local timber purchasers have been critical of the Forest recently for not offering enough green sawtimber. The purpose of this Assessment is to describe current conditions, to determine if those conditions are within the natural range of variability, and to project future trends. Identification of desired conditions and how to achieve and/or maintain those conditions will occur later in the Forest Plan Revision process when plan alternatives are developed. The Ashley National Forest will work within "the regulatory framework and statutory mandates" as they currently exist to develop the revised Forest Plan; the revision process is not the avenue to resolve problems with regulations and statutes.
C.E. Brooks & Associates, P.C., Cody Doig	The assessment also omits the risks to the watersheds with the increased wildfire risk. Coalition members in Uinta and Sweetwater Counties depend on water flowing from the ANF into the counties as well as water stored on the ANF. The Assessment addresses watershed in terms only related to grazing, roads and timber. It entirely omits the risk of wildfire and the direct link to harm to watersheds. Given the state of the timber and other vegetation the risk of wildfire requires an admission of the consequences, including loss of watershed condition and water quality.	Effects of wildfire on watershed and water quality are discussed in the Air, Soil and Watershed Resources technical report. Wildfire as a landscape scale disturbance is discussed on pages 87 to 88. Wildfire risk and fire condition class are measures incorporated into the 2011 Watershed Condition Framework (pages 94-97). On pages 62 and 86 wildfire and flood response effects in severely burned areas are listed as potential watershed and soil concerns. Pages 31-32 discuss wildfire emissions effects on air quality. The Aquatic Ecosystem technical report also includes wildfire in discussion of drivers and stressors and in trends for key aquatic ecosystem characteristics. A separate Wildfire Baseline technical report is dedicated to role and trends for wildfire on the Forest. In the Public Draft Assessment Report, discussion of wildfire and wildfire risk is included in the Terrestrial Ecosystems, Soils, Air, Carbon Sequestration, Social and Economic Conditions, and the Timber and Other Forest Products sections of the report. Text has been added to the Aquatic and Riparian Ecosystems section of report to summarize wildfire discussion that appears in the corresponding Aquatic Ecosystem and the Air Soil and Watershed Resources technical reports.
C.E. Brooks & Associates, P.C., Cody Doig	Repeatedly throughout the Draft Report, livestock grazing is characterized as an "important" economic driver but the Draft Report contradicts itself when it concludes that livestock grazing is not a "major economic contributor." Draft Report at 76. The Draft Report reaches this conclusion despite the fact that livestock grazing involves 92 permittees (and their ranches), 162 jobs, \$3.5million in labor, and an unidentified amount of secondary and tertiary socioeconomic benefits that the Draft Assessment fails to capture. No mention is made of the benefits to wildlife habitat, fire fuel management, or other quantifiable benefits that livestock grazing contributes to the ecosystem. Thus, general assertions that livestock grazing is not a "major economic contributor" skew the narrative to the detriment of families and ranches that have worked on the Ashley National Forest for more than 70 years.	The Ashley National Forest recognizes the economic, social, and cultural importance of livestock grazing to local communities. Additional language has been added to the cultural services discussion presented in the Draft Assessment, page 71, to note social and cultural contributions. 2014 total employment in the analysis area was about 65,000 jobs and \$4 billion in labor income. The economic contributions from FS activities on the Ashley NF, including from grazing, is less than 1% of the total employment in the economic analysis area. Therefore, the grazing contributions are not considered major economic contributions when compared to the economic conditions in the analysis area. The economic contributions estimated in the assessment report include direct, indirect, and induced impacts. The assessment is based on readily available information for rapid analysis. Additional baseline data and impacts analysis related to livestock grazing from proposed management will be considered and analyzed as appropriate for the EIS.
C.E. Brooks & Associates, P.C., Cody Doig	The Forest Service evaluated the Rangelands on the Ashley National Forest using watershed condition data. Significantly the factors leading to lower rating were in the NRA and were unrelated to grazing. Draft Report at 79 (invasive species, ingrowth of sagebrush and drought). Watershed condition data is a relatively coarse scale analysis that will not capture vegetation conditions, soils, or riparian habitat values. The Coalition expects that this "snapshot" will be supplemented with actual monitoring data developed in coordination with permittees and would encourage the Forest Service to contact the Coalition for assistance with developing strong rangeland information.	Data from the Watershed Condition Framework was one source the Ashley National Forest used to evaluate rangeland conditions on the Forest. The Forest also used many long-term trend studies to support the conclusions made in the Watershed Condition Framework. This monitoring data is available to the public.
C.E. Brooks & Associates, P.C., Cody Doig	The Draft Report states that "[i]n 2001, the Roadless Rule decreased the amount of area suitable for timber harvest to 135,000 acres, or roughly 10 percent of the Ashley National Forest." Draft Report at 82. This assertion is legally incorrect and is symptomatic of the misguided approach that has produced the conditions on the Ashley National Forest. The Roadless Rule did not absolutely preclude road building, road maintenance, or timber harvest activities. See 66 Fed. Reg. 3244, 3263-66 (Jan. 12, 2001). Instead, the Roadless Rule explicitly provided for both in most instances and definitely in the case of the Ashley National Forest. The 2001 Roadless Rule allowed the construction and reconstruction of roads to: (1) limit the threat of a catastrophic event; (2) facilitate activities under the Comprehensive Environmental Response, Compensation, and Liability Act; (3) to allow the exercise of pre-existing rights; (4) realign existing roads; (5) rectify hazardous conditions; or (6) complete a Federal Aid Highway Project. The exception to address hazardous conditions includes vegetation projects, thinning, selective harvest, or sanitation harvests. Center for Biological Diversity v. U.S. Forest Service, 349 F.3d 1157, 1167 (9th Cir. 2003) (Forest Service has obligation to restore and respond to opposing views); Western Watersheds Project v. Kravenshik, 632 F.3d 472, 483 (9th Cir. 2011). The Forest Service could easily avoid the insect invasion and resulting harm to overall forest health by selective harvest or sanitation harvest to mitigate the risk of a catastrophic fire. The Assessment claims no action was taken due to the lack of roads and budget. Assessment at 25. Indeed, the Forest Service can still take measures to fight beetles and tree mortality. Utah Envt'l. Cong. v. Bosworth, 370 F. Supp.2d 1157, 1165 (2005) (affirming categorical exclusion for spruce beetle project affecting 123 acres in a roadless area). However, the Draft Assessment takes the opposite tack when the Forest Service actually intends to make the problem worse by proposing the decommission of additional roads. See Draft Report at 96. The 2015 Road Inventory should be considering existing roads and how they are necessary to facilitate management of the forest rather than the predominant and misinformed position that roads harm the environment. Further, the inventory should evaluate precisely those "roadless" areas that should be considered roads and timber harvest that could limit a catastrophic event.	The management of system roads and routes is generally addressed in the Travel Management Plan or at the site specific NEPA level. Closure of non-system routes on the Forest is an administrative process and will not be addressed in the assessment. Regarding the 2001 Roadless Rule and timber suitability, the 2012 Planning Rule requires the Forest Service to determine "Lands Not Suitable for Timber Production" (36 CFR 219.11). This includes lands where statute, executive order, or regulation prohibits timber production on the land or The Secretary of Agriculture or the Chief has withdrawn the land from timber production (36 CFR 219.11(a)). The directives associated with the 2012 Planning Rule define Inventoried Roadless Areas as Administratively Designated Areas by the Secretary of Agriculture (FSH 1909.12, 24 Exhibit 01 and 6.1.1). This analysis will occur later in the plan revision process. The statement, "In 2001, the Roadless Rule decreased the amount of area suitable for timber harvest to 135,000 acres, or roughly 10 percent of the Ashley National Forest. The remaining lands (approximately 1,265,000 acres) are classified as unsuitable for timber production due to factors such as steep slopes, lack of timber-producing vegetation types, or designated areas where harvesting timber is not in keeping with area resource objectives" was included in the draft assessment to explain one reason why it has been difficult for the Forest to average more than 5.7 million board feet over the last 10 years. However, there is enough context in the paragraph for this statement to be removed and still disclose the conditions and trends of wood product removal on the Forest.
C.E. Brooks & Associates, P.C., Cody Doig	The assessment also lacks relevant recreation data and an evaluation of the purpose and need of the affected roads. It is not clear that the Forest Service followed any recognized basis for the road closures other than budget constraints.	The management of system roads and routes is generally addressed in the Travel Management Plan or at the site specific NEPA level. Closure of non-system routes on the Forest is an administrative process and will not be addressed in the assessment. Regarding the 2001 Roadless Rule and timber suitability, the 2012 Planning Rule requires the Forest Service to determine "Lands Not Suitable for Timber Production" (36 CFR 219.11). This includes lands where statute, executive order, or regulation prohibits timber production on the land or The Secretary of Agriculture or the Chief has withdrawn the land from timber production (36 CFR 219.11(a)). The directives associated with the 2012 Planning Rule define Inventoried Roadless Areas as Administratively Designated Areas by the Secretary of Agriculture (FSH 1909.12, 24 Exhibit 01 and 6.1.1). This analysis will occur later in the plan revision process. The statement, "In 2001, the Roadless Rule decreased the amount of area suitable for timber harvest to 135,000 acres, or roughly 10 percent of the Ashley National Forest. The remaining lands (approximately 1,265,000 acres) are classified as unsuitable for timber production due to factors such as steep slopes, lack of timber-producing vegetation types, or designated areas where harvesting timber is not in keeping with area resource objectives" was included in the draft assessment to explain one reason why it has been difficult for the Forest to average more than 5.7 million board feet over the last 10 years. However, there is enough context in the paragraph for this statement to be removed and still disclose the conditions and trends of wood product removal on the Forest.
Uintah County Cattlemen's Association, Ritchie Anderson	While some plants may truly be nonnative and invasive there is some uncertainty as to whether some plants such as cheatgrass is a nonnative, invasive species.	The assessment identifies and discusses stressors and drivers of vegetation communities. An important stressor of sagebrush, pinyon-juniper, and desert shrub communities are invasive plant species. Invasive plants are typically non-native with high capacity to establish, spread, and dominate native plant communities. They have and are altering native plant species composition indefinitely by competitively displacing native plants, especially following a disturbance event such as fire or drought. Invasive annual plants such as cheatgrass and haloxylon have low resource value and degrade forest rangelands. Invasive plants have been adequately discussed within the assessment.
Uintah County Cattlemen's Association, Ritchie Anderson	We hope the Forest Service does not feel that livestock grazing only exacerbates the issue of invasive plant species and instead recognizes the role livestock grazing can play in combating and managing invasive plant species.	On page 61 in the Terrestrial Ecosystems technical report the following paragraph was modified to, "In some instances, higher species richness was documented in sagebrush communities with introduced grass understories and where light to moderate grazing intensities are managed for (Studies 68-2E-G, 68-18B, 68-73D3-E). In addition, some research has shown that targeted livestock grazing can enhance habitat for wildlife, especially elk habitat (Anderson and Scherzinger 1975, Frisina 1992, Vavra 2005, Crane and others 2016)."
Uintah County Cattlemen's Association, Ritchie Anderson	The same is true with soil condition. In many cases livestock can be used to improve soil conditions.	On page 61 in the Terrestrial Ecosystems technical report the following paragraph was modified to, "In some instances, higher species richness was documented in sagebrush communities with introduced grass understories and where light to moderate grazing intensities are managed for (Studies 68-2E-G, 68-18B, 68-73D3-E). In addition, some research has shown that targeted livestock grazing can enhance habitat for wildlife, especially elk habitat (Anderson and Scherzinger 1975, Frisina 1992, Vavra 2005, Crane and others 2016)."
Uintah County Cattlemen's Association, Ritchie Anderson	We agree with much of the Forest Service's assessments of the economic and social benefits of livestock grazing to the community. However, we do not feel the economic benefits can be understated. Livestock is the primary agriculture product produced in the Uintah Basin and contributes millions of dollars of direct and indirect economic benefit. As revenue from such industries as oil and gas are extremely important, they tend to go through cycles of boom and bust. Ranching has been a staple of the economy for nearly 150 years and has acted as an economic stabilizer when other industries are going through periods of economic down turn. As the revision process continues to move forward we hope the Forest Service will find way to maximize the ecological, social and economic benefits of livestock grazing.	The Ashley National Forest recognizes the economic, social, and cultural importance of livestock grazing to local communities. Additional language has been added to the cultural services discussion presented in the Draft Assessment, page 71, to note social and cultural contributions. 2014 total employment in the analysis area was about 65,000 jobs and \$4 billion in labor income. The economic contributions from FS activities on the Ashley NF, including from grazing, is less than 1% of the total employment in the economic analysis area. Therefore, the grazing contributions are not considered major economic contributions when compared to the economic conditions in the analysis area. The economic contributions estimated in the assessment report include direct, indirect, and induced impacts. The assessment is based on readily available information for rapid analysis. Additional baseline data and impacts analysis related to livestock grazing from proposed management will be considered and analyzed as appropriate for the EIS.

Public Lands Policy Coordinating Office, Sindy Smith	The Draft Assessment should, as stated in the introduction, "rapidly evaluate existing, relevant information" about the Ashley National Forest. However, the Draft Assessment and Technical Reports should not draw conclusions on the appropriate forest management in the future. Forest Service decision making must occur independently only after fully considering information presented by Cooperating Agencies and local governments during the NEPA process. If the Draft Assessment were to direct future management under the revised plan it would fundamentally impair the NEPA process and curtail the critical role of cooperating agencies.	The following sentence was on page 23 was removed from the draft Terrestrial Ecosystems Technical Report, "Livestock grazing is not expected to increase in alpine areas during the next plan period and current grazing management is not expected to move plant communities outside the natural range of variation." The following sentence was on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, minimal changes in fire suppression policies are expected and timber harvest production most likely will remain stable or decrease." The following sentence on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged." The sentence was changed to, "Elk numbers within the State of Utah are expected to increase over the next decade based on the current trend to manage for increased state population objectives." The following sentence on page 61 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush communities." The following sentence was removed in the draft Terrestrial Ecosystems Technical Report to, "However, long-term monitoring demonstrates aspen sustainability in the plan area concurrent with existing levels of permitted livestock grazing and wild ungulate use." The following sentence was removed in the Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged, but elk numbers are expected to increase during the next plan period." The following sentence on page 88 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, minimal changes in fire suppression policies are expected and timber harvest production most likely will remain stable or decrease." The following sentence on page 109 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush."
Public Lands Policy Coordinating Office, Sindy Smith	Rare Habitat TypesPage 21, paragraph 3. Include both livestock and wildlife grazing as potential stressors to rare habitat.	In the assessment, livestock and wildlife impacts are recognized as stressors to terrestrial vegetation communities where those impacts occur. These have been evaluated for past, current, and foreseeable impacts to vegetation communities, including rare and unique habitats. Refer to pages 17, 19, and 23 of the draft assessment and pages 9, 11-12, 19, 41, 61, and 75 in the Terrestrial Ecosystems Report that discuss domestic and wild ungulate impacts on terrestrial vegetation communities.
Public Lands Policy Coordinating Office, Sindy Smith	Multiple UsePage 1, paragraph 1. The second sentence should include "multiple use" language alongside the necessity of "sustainability." Multiple use is a vital part of the Forest Service's overall mission and a key component of sustainability. Additionally, the National Forest Management Act (NFMA) directs the Forest Service to employ management that is "designed to secure the maximum benefits of multiple use and sustained yield management." Including "multiple use" alongside sustainability better reflects the Forest Service's Congressional mandate.	We are definitely striving to meet the intent of the 2012 Planning Rule and look for opportunities to encourage multiple use.
Public Lands Policy Coordinating Office, Sindy Smith	Fuels ManagementPage 9, Paragraph 2. Prescribed fire is listed as means to reduce overall source pollution. Please include livestock grazing as an additional tool to reduce fuel loads and reduce the risk of catastrophic wildfires. Livestock grazing is not only an effective fuels reduction tool at the Forest Service's disposal, but also is one of the only tools available to reduce annual cheat grass, which is an increasing resource threat that contributes to catastrophic fire throughout the State.	Sentence on page 9 changed to, "The emissions are not controlled by management except indirectly, through fire suppression, fuels management projects, and other ongoing activities."
Public Lands Policy Coordinating Office, Sindy Smith	Soil ImpactsPage 11, paragraph 5 Consider including improved management practices and education as an area of focus to protect soil quality. Including incentives for improved management has proven effective in promoting more sustainable land management on private and State lands in Utah. The same concept could be applied to land users on the Ashley National Forest.	The Revised Forest Plan EIS will provide the opportunity for identifying potential management changes on the Forest to benefit soil resources and protect soil quality. The Ashley National Forest follows USDA National Best Management Practices, State of Utah guidelines, and directives and guidelines from the Intermountain Regional Office that are important to monitoring soils and maintaining soil quality. The Soil, Water, Air Program on the Ashley National Forest are frequently worked with volunteers and organizations to conduct field projects, and is open to continuing these partnerships in the future.
Public Lands Policy Coordinating Office, Sindy Smith	Riparian Areas and WetlandsPage 15, Paragraph 4. Sustainable livestock grazing can be beneficial for riparian areas. Include in this paragraph some of the positive effects of grazing on riparian areas including higher species richness (Clary 1999), higher levels of biomass (Martin and Chambers 2001), a disturbance tool for riparian restoration (Sovell et al. 2000), and maintaining beneficial grassy riparian buffers (Lyons et al. 2000).	The discussion of sustainable levels of grazing appears in multiple sections of the Assessment Report. In the Aquatic and Riparian Ecosystems section potential adverse effects from livestock and wildlife such as elk and deer is mentioned when considering possible stressors to groundwater dependent ecosystems (p 19). The Ashley National Forest Assessment Report summarizes information found in companion technical reports. The Aquatics Ecosystem technical report cites wild ungulate and livestock herbivory effects on pages 10, 14, 16, 17 and 22. The passage the comment appears to be directed at is on page 65 within the Air Soil and Water Resources technical report. This segment of the report describes geomorphic condition and trends observed at some springs and stream corridors in the Green River LTA. In other LTA descriptions of this section, both livestock and wildlife use appear.
Public Lands Policy Coordinating Office, Sindy Smith	Watershed ConditionsPage 18, paragraph 4. Include a discussion of the effects that wildlife and other uses have on stream channels, riparian areas, upland areas, and water quality. These effects can be similar to those of livestock.	The discussion of sustainable levels of grazing appears in multiple sections of the Assessment Report. In the Aquatic and Riparian Ecosystems section potential adverse effects from livestock and wildlife such as elk and deer is mentioned when considering possible stressors to groundwater dependent ecosystems (p 19). The Ashley National Forest Assessment Report summarizes information found in companion technical reports. The Aquatics Ecosystem technical report cites wild ungulate and livestock herbivory effects on pages 10, 14, 16, 17 and 22.
Public Lands Policy Coordinating Office, Sindy Smith	Vegetation Conditions and TrendsPage 26, paragraph 1. The ecosystem changes affecting "other resources and uses" listed in this section is wholly inadequate. Loss of vegetation diversity and other ecosystem changes have a direct and potentially devastating impact on a wide variety of multiple use activities. These uses include loss of harvestable timber and loss of forage for both domestic livestock and wildlife. These impacts and steps to remedy these changes need to be listed and discussed.	On page 26, sentence was changed in this paragraph to, "Forests impacted by wildfire and beetles could result in the loss of harvestable timber as well as safety issues for recreationists as dead trees fall, or effects to scenery when impacted by fires." On page 27, a sentence was added after, "Sagebrush communities below 8,000 feet are more susceptible to drought, fire, and invasive annual plant species than those of higher elevations. Sagebrush communities at these elevations could experience a loss of forage for both domestic livestock and wildlife."
Public Lands Policy Coordinating Office, Sindy Smith	Pinyon-Juniper ForestsPage 26, paragraph 5. This paragraph seems to counter current trends. More clarity and explanation is needed in this section because it is well accepted that pinyon-juniper encroachment is a problem across the Western United States. If the Forest Service is referring to "persistent" or old growth pinyon-juniper then that needs to be stated and discussed separately. The draft assessment should unequivocally state that pinyon-juniper encroachment into sagebrush and grasslands ecosystems is a problem that needs to be dealt with through mechanical or other means. Evidence of Pinyon-Juniper on the Ashley National Forest predating European settlement does not in and of itself indicate that the location and density found today is natural and should not be altered. Fire suppression and improper grazing in the early 19th century among other factors have led to dramatic changes in forest and range conditions resulting in the need for aggressive management to restore rangelands and watersheds. Additionally, the multiple use mandate given to you by Congress requires the management of pinyon-juniper whether or not existing stands are considered old growth. Should the Forest Service find that old growth/persistent pinyon-juniper does not warrant treatment, a comprehensive discussion should be undertaken to identify those areas so that younger growth or encroachment can be identified and treated.	The encroachment of pinyon-juniper into other communities is mentioned many times in the assessment. Please see the following located in the Draft Terrestrial Ecosystems Technical Report: P. 60: "Many communities, especially those within and above the pinyon-juniper belt are susceptible to conifer encroachment and displacement." "Notable trends include most mountain big sagebrush communities in late seral stages with canopy cover exceeding 20 percent and widespread encroachment and displacement of conifers in many of these communities. Some sagebrush communities have transitioned into conifer forest or woodland types with prolonged absence of fire." P. 63: "For decades, conifer encroachment in, and displacement of sagebrush communities has progressively increased with decreased fire frequency, which indicates moderate departure from the natural range of variation. This trend is most common in mountain big, Wyoming big, and black sagebrush communities in and above the pinyon-juniper belt and in upper elevations of mountain big and black sagebrush near Douglas-fir and ponderosa pine forests." P. 64: "Conifer encroachment and displacement occurs within some sagebrush communities, but not of the magnitude within and directly above the pinyon-juniper belt." P. 109: "For decades, conifer encroachment in and displacement of sagebrush communities has progressively increased with decreased fire frequency. This increase in conifer encroachment suggests a low to moderate departure from the natural range of variation. This trend is most common in mountain big, Wyoming big, and black sagebrush communities within and above the pinyon-juniper belt." P. 110: "Conifer encroachment and displacement occurs within some communities, but not of the magnitude within and directly above the pinyon-juniper belt."
Public Lands Policy Coordinating Office, Sindy Smith	Species of Public InterestPage 35 paragraph 3. The paragraph titled "Species of Public Interest" needs to be completely removed from the Draft Assessment Report. Under the 2012 planning rule, the Forest Service is required to include plan components for federally listed endangered species, threatened species, and species of conservation concern (SCC). This new classification of species of public interest is outside the purview of the Forest Service and is both unnecessary and not within the Forest Service's jurisdiction.	While technically the comment is correct, potential species of conservation concern are referred to in the 2012 planning regulations. This is because until the Regional Forester finalizes the unit's list they are "potential" species of conservation concern. Species of interest are considered because of their social and economic importance to a Forest Plan.
Public Lands Policy Coordinating Office, Sindy Smith	Species of InterestPage 35-38 Remove all "species of interest" from the Draft Assessment report. These animals are not classified as species that the Forest Service is required to consider under the 2012 planning rule. They are also outside the authority of the Forest Service to manage or include in any step of the forest plan revision.	While technically the comment is correct, potential species of conservation concern are referred to in the 2012 planning regulations. This is because until the Regional Forester finalizes the unit's list they are "potential" species of conservation concern. Species of interest are considered because of their social and economic importance to a Forest Plan.
Public Lands Policy Coordinating Office, Sindy Smith	Potential Species of ConcernPage 35-38 Are "potential species of concern" the same as "species of conservation concern"? The inconsistency between these two phrases is confusing and needs to be clarified. If these species are actually SCC the report needs to state that. If they are not, the Forest Service is stepping outside of the mandates of the 2012 planning rule by including potential species of concern. The Forest Service is not tasked with identifying "potential species of concern". There is a scientific process employed by the U.S. Fish and Wildlife to list animals as species of conservation concern. Listing "potential" species requires no scientific evidence and is outside the Forest Service's purview. Using potential threats to habitat would qualify almost all wildlife as potential species of concern due to the constant possibility of habitat threats.	While technically the comment is correct, potential species of conservation concern are referred to in the 2012 planning regulations. This is because until the Regional Forester finalizes the unit's list they are "potential" species of conservation concern. Species of interest are considered because of their social and economic importance to a Forest Plan.
Public Lands Policy Coordinating Office, Sindy Smith	Cultural ServicesPage 71, paragraph 5. Include a discussion of the cultural and social values that ranching on the Ashley National Forest brings to individuals and communities throughout the area. Many of these families have grazed the same pastures for generations and place high value on continuing to graze those lands. The social and cultural value that ranchers place on access to Forest rangelands and the resulting lifestyle it brings cannot be understated.	The Ashley National Forest recognizes the social and cultural importance of livestock grazing. Additional language has been added to the cultural services discussion presented in the Draft Assessment, page 71, to note these contributions.
Public Lands Policy Coordinating Office, Sindy Smith	Economic ContributionsPage 72, paragraph 2. Include agriculture and timber harvesting as economic contributors. Although they may not be as significant as other contributors, they are still integral to the health of local economies and are part of the Forest's multiple use mandate. In addition, agriculture is a much larger industry than tourism, which is included. The failure to include these contributions appears to be a reflection of the Ashley National Forest's lack of concern for these key industries.	The noted paragraph on page 72 of the Draft Assessment has been edited to clarify that timber and agriculture represent important economic contributions from the Ashley National Forest.
Public Lands Policy Coordinating Office, Sindy Smith	Conditions and TrendsPage 65, paragraph 6, pages 67-72. These sections fail to include analysis regarding the impacts that wildlife potentially has on riparian areas. Wildlife may have detrimental effects on soil and needs to be analyzed alongside livestock in order to more accurately evaluate riparian areas on the forest.	The discussion of sustainable levels of grazing appears in multiple sections of the Assessment Report. In the Aquatic and Riparian Ecosystems section potential adverse effects from livestock and wildlife such as elk and deer is mentioned when considering possible stressors to groundwater dependent ecosystems (p 19). The Ashley National Forest Assessment Report summarizes information found in companion technical reports. The Aquatics Ecosystem technical report cites wild ungulate and livestock herbivory effects on pages 10, 14, 16, 17 and 22. The passage the comment appears to be directed at is on page 65 within the Air Soil and Water Resources technical report. This segment of the report describes geomorphic condition and trends observed at some springs and stream corridors in the Green River LTA. In other LTA descriptions of this section, both livestock and wildlife use appear.
Public Lands Policy Coordinating Office, Sindy Smith	Conditions and TrendsPage 65, paragraph 6, pages 67-72. Sustainable livestock grazing can be beneficial for riparian areas. Please include in this paragraph some of the positive effects of proper livestock grazing on riparian areas including higher species richness (Clary 1999), higher levels of biomass (Martin and Chambers 2001), a disturbance tool for riparian restoration (Sovell et al. 2000), and maintaining beneficial grassy riparian buffers (Lyons et al. 2000). Also, the Forest Service needs to specify when it is talking about proper or improper grazing techniques rather than label all effects as negative.	The discussion of sustainable levels of grazing appears in multiple sections of the Assessment Report. In the Aquatic and Riparian Ecosystems section potential adverse effects from livestock and wildlife such as elk and deer is mentioned when considering possible stressors to groundwater dependent ecosystems (p 19). The Ashley National Forest Assessment Report summarizes information found in companion technical reports. The Aquatics Ecosystem technical report cites wild ungulate and livestock herbivory effects on pages 10, 14, 16, 17 and 22. The passage the comment appears to be directed at is on page 65 within the Air Soil and Water Resources technical report. This segment of the report describes geomorphic condition and trends observed at some springs and stream corridors in the Green River LTA. In other LTA descriptions of this section, both livestock and wildlife use appear.
Public Lands Policy Coordinating Office, Sindy Smith	Comments Concerning the Terrestrial Ecosystems The State is concerned that the terrestrial ecosystems technical report uses very limited science when studying the effects of all ungulate grazing on rangelands (Chaikina and Ruckstuhl 2006). There is substantial evidence that all large ungulates have significant effects on both vegetative ecosystems and available forage for other large ungulates (Hobbs et al. 1996, 1996; Odadi et al. 2007, 2009). Consequently, it is necessary that the Forest Service include in its Draft Assessment Report and upcoming Forest Plan the necessity of managing habitat to support multi-ungulate systems that balance the necessities of both domestic livestock and wildlife (Vavra and Riggs 2010). In addition, the State is concerned that the Forest Service makes no distinction between proper and improper grazing management when referencing livestock grazing throughout this report.	The Ashley National Forest uses "best available science" to determine condition and trend when analyzing impacts of domestic and wild ungulate grazing on rangelands. Best available science includes both relevant published literature and quantitative and qualitative information derived from site specific monitoring. Site specific information collected from long-term studies is used to determine whether or not desired conditions are being met and to determine the direction of trend. Over 19,000 long-term studies are currently established on the forest and are the primary basis for the assessment. Monitoring methods used by the Ashley National Forest are selected based on efficiency, economy, and relevant output information that directly addresses desired condition criteria. Several monitoring methods are or have been used to gather data for condition and trend analysis. These include but are not limited to repeat photography, photo plot, line intercept, line point intercept, vegetation ocular macroplot, nested frequency, and greenline. Each of these methods have been peer reviewed, are included in the Forest Service Handbook 2209.14 Chapter 20, and/or are supported in literature. Several key rangeland characteristics are monitored at many of the study sites to determine condition and indicate trend for vegetation. These may include ground cover, species presence and cover and/or frequency, crown cover, density, and vegetation height. The response of herbaceous and woody plant species following disturbance (i.e. grazing) is also assessed at affected sites. These characteristics are applicable to the management and desired condition standards and mitigation measures for vegetation listed below. Total ground cover equal to or greater than 85% of potential for all plant communities grazed by livestock. Plant communities dominated by native and selected non-native plant species of moderate to high value for watershed protection (or erosion control) are equal to or greater than 60% of relative cover in plant communities. Selected non-native species are those included in seedings of roadsides, burned areas, and rangelands that have high value for soil protection. These species have generally demonstrated capacity to suppress cheatgrass and other invasive annuals. Dominance includes greater cover, greater frequency, or greater abundance of moderate and high value plants than low value plants. This includes woody species as well as herbaceous species. Manage grazing in aspen stands to ensure sprouting and sprout survival sufficient to perpetuate the long-term viability of aspen clones. Crown cover of aspen sprouts 40% or greater at five years post-disturbance. Stream bank stability is equal to or greater than 80% of potential. Utilization of key forage species no greater than 50% of current year's growth except where long-term monitoring demonstrates a different allowable use level is appropriate. In goshawk habitat (forested lands, including transitory openings created by fire), limit understory grazing utilization to an average of 20% by weight, not to exceed 40% on any specific site. Average browse utilization would be limited to 40% by weight, and would not exceed 60%. This standard does not apply to non-forested habitat types (Goshawk Strategy). Leave a 4" or greater stubble height of herbaceous species at the end of the grazing season between greenline and bank full of stream systems. The assessment for vegetation resources addressed natural range of variation, current status and trend, management activities and uses, influence of drivers and stressors, and climate related risks and trends. Site specific information from thousands of long-term studies was used to address these key characteristics based on the methodology described above, which indicates that best available science was used to make determinations in the assessment including those regarding livestock grazing and wild ungulate use. In conclusion, we believe that adequate scientific evidence was used to make these determinations.
Public Lands Policy Coordinating Office, Sindy Smith	Current Range ConditionsPage 20, paragraph 4. The State is concerned with the following sentence: "Livestock grazing is not expected to increase in alpine areas during the next plan period and current grazing management is not expected to move plant communities outside the natural range of variation." The State commented on this statement previously. The State remains concerned that this statement is pre-decisional and asks the Forest Service to reconsider this statement. As currently written, this statement is pre-decisional and could unduly impact the outcome of the upcoming NEPA process. Livestock stocking levels are management decisions, and it is premature for the Forest Service to declare that "livestock grazing is not expected to increase during the next plan period" at this state of the forest plan revision process. Future stocking levels will be guided by the revised forest plan, and the alternatives selected for the revised plan are, as yet, unknown. The NEPA process for the plan revision could potentially include an "increased grazing" alternative, and the Forest Service could foreseeably select such an alternative in the revised plan's Record of Decision. Under this scenario, livestock grazing could increase in alpine areas. In its response to the State's earlier comments, the Forest Service stated "[l]ong-term monitoring indicates that alpine allotments are stocked at approved rates that have and should continue to maintain satisfactory resource conditions and trends." While this statement may be true, livestock grazing in alpine areas could nevertheless increase under the revised plan. An increase in stocking rates may result from a change in management direction, the adoption of new and improved range management techniques, unexpected changes in forage availability, etc. The technical reports are intended to "rapidly evaluate existing, relevant information" about the Ashley National Forest, and predictions about future management direction are not appropriate in a Technical Report or Draft Assessment Report. The State respectfully requests that the sentence cited above be removed from the Terrestrial Ecosystems Report.	The following sentence was on page 23 was removed from the draft Terrestrial Ecosystems Technical Report, "Livestock grazing is not expected to increase in alpine areas during the next plan period and current grazing management is not expected to move plant communities outside the natural range of variation." The following sentence was on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, minimal changes in fire suppression policies are expected and timber harvest production most likely will remain stable or decrease." The following sentence on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged." The sentence was changed to, "Elk numbers within the State of Utah are expected to increase over the next decade based on the current trend to manage for increased state population objectives." The following sentence on page 61 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush communities." The following sentence on page 88 was changed in the draft Terrestrial Ecosystems Technical Report to, "However, long-term monitoring demonstrates aspen sustainability in the plan area concurrent with existing levels of permitted livestock grazing and wild ungulate use." The following sentence was removed in the Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged, but elk numbers are expected to increase during the next plan period." The following sentence on page 88 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush."
Public Lands Policy Coordinating Office, Sindy Smith	Current Timber ConditionsPage 43, paragraph 1. The State is concerned with the following sentence: "During the next plan period, minimal changes in fire suppression policies are expected and timber harvest production most likely will remain stable or decrease." This sentence is another example of a pre-decisional statement that is out of context in this pre-NEPA technical report. It is not the role of the Draft Assessment of the Technical Reports to forecast fire suppression policies. The role of fire suppression will be guided by the revised forest plan, and the Forest Service must have full flexibility to develop a full range of alternatives in the revised plan's environmental impact statement (EIS). Specific fire suppression and timber harvesting management decisions have not yet been decided upon, and decision makers could find that changes to fire suppression policy are warranted in the Draft Assessment. The State requests that the sentence cited above be edited or removed.	The following sentence was on page 23 was removed from the draft Terrestrial Ecosystems Technical Report, "Livestock grazing is not expected to increase in alpine areas during the next plan period and current grazing management is not expected to move plant communities outside the natural range of variation." The following sentence was on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, minimal changes in fire suppression policies are expected and timber harvest production most likely will remain stable or decrease." The following sentence on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged." The sentence was changed to, "Elk numbers within the State of Utah are expected to increase over the next decade based on the current trend to manage for increased state population objectives." The following sentence on page 61 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush communities." The following sentence on page 88 was changed in the draft Terrestrial Ecosystems Technical Report to, "However, long-term monitoring demonstrates aspen sustainability in the plan area concurrent with existing levels of permitted livestock grazing and wild ungulate use." The following sentence was removed in the Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged, but elk numbers are expected to increase during the next plan period." The following sentence on page 109 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush."
Public Lands Policy Coordinating Office, Sindy Smith	Livestock NumbersPage 43, paragraph 2. The State is concerned with the following language: "Permitted livestock use is expected to remain relatively unchanged, but elk numbers are expected to increase over the next decade." In its written response to the State's previous comment letters, the Forest Service said that the sentence cited above would be removed from the Terrestrial Ecosystems Assessment. Unfortunately, this has not occurred in the Public Draft of the Terrestrial Ecosystems Assessment. The State again requests that this sentence be removed, as previously assured by the Forest Service. This statement is pre-decisional, as discussed previously, and is inappropriate at this stage of the plan revision process. Technical Reports should evaluate existing forest conditions (including the adequacy of existing livestock stocking rates) but should not presuppose management decision under a revised forest plan. The selection of an alternative under NEPA must be made independent of the Forest Assessment (although the Forest Assessment should be utilized as a useful tool).	The following sentence was on page 23 was removed from the draft Terrestrial Ecosystems Technical Report, "Livestock grazing is not expected to increase in alpine areas during the next plan period and current grazing management is not expected to move plant communities outside the natural range of variation." The following sentence was on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, minimal changes in fire suppression policies are expected and timber harvest production most likely will remain stable or decrease." The following sentence on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged." The sentence was changed to, "Elk numbers within the State of Utah are expected to increase over the next decade based on the current trend to manage for increased state population objectives." The following sentence on page 61 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush communities." The following sentence on page 88 was changed in the draft Terrestrial Ecosystems Technical Report to, "However, long-term monitoring demonstrates aspen sustainability in the plan area concurrent with existing levels of permitted livestock grazing and wild ungulate use." The following sentence was removed in the Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged, but elk numbers are expected to increase during the next plan period." The following sentence on page 88 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush."
Public Lands Policy Coordinating Office, Sindy Smith	Influence of Drivers and Stressors Page 61, paragraph 3, page 75 paragraph 2. Although both wildlife (Buck and Peek 2005; Torstenson et al. 2006) and livestock are stressors on sagebrush communities, the Forest Service fails to note how proper livestock grazing benefits wildlife habitat (Anderson and Scherzinger 1975; Frisina 1992) through altered plant communities, increased specie productivity, increased nutritive forage quality, and increased habitat diversity (Vavra 2005). Please identify how proper grazing can benefit, and not only stress, ecosystems.	On page 61 in the Terrestrial Ecosystems technical report the following paragraph was modified to, "In some instances, higher species richness was documented in sagebrush communities with introduced grass understories and where light to moderate grazing intensities are managed for (Studies 68-2E-G, 68-18B, 68-73D3,E). In addition, some research has shown that targeted livestock grazing can enhance habitat for wildlife, especially elk habitat (Anderson and Scherzinger 1975, Frisina 1992, Vavra 2005, Crane and others 2016)."
Public Lands Policy Coordinating Office, Sindy Smith	Grazing IncreasePage 61, paragraph 3. Toward the end of the paragraph the Forest Service states that they do not expect grazing to increase during the next plan period. To ensure that there is not a bias against livestock grazing moving forward with the forest plan revision, the State suggests that the Forest Service include different language. The failure to identify all options, once again, lends the reader to believe the forest plan is pre-decisional in nature. More appropriate language might state that increases are not expected "unless further analysis finds that range conditions allow" in accordance with acceptable range standards.	The following sentence was on page 23 was removed from the draft Terrestrial Ecosystems Technical Report, "Livestock grazing is not expected to increase in alpine areas during the next plan period and current grazing management is not expected to move plant communities outside the natural range of variation." The following sentence was on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, minimal changes in fire suppression policies are expected and timber harvest production most likely will remain stable or decrease." The following sentence on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged." The sentence was changed to, "Elk numbers within the State of Utah are expected to increase over the next decade based on the current trend to manage for increased state population objectives." The following sentence on page 61 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush communities." The following sentence on page 88 was changed in the draft Terrestrial Ecosystems Technical Report to, "However, long-term monitoring demonstrates aspen sustainability in the plan area concurrent with existing levels of permitted livestock grazing and wild ungulate use." The following sentence was removed in the Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged, but elk numbers are expected to increase during the next plan period." The following sentence on page 88 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush."
Public Lands Policy Coordinating Office, Sindy Smith	Grazing ReductionsPage 61, paragraph 3. Toward the end of the paragraph, the report insinuates that sagebrush communities with heavy grazing will face further reductions in livestock AUMs and changes in management. However, the report fails to provide specific scientific evidence to back up any expectations of future reductions. The Forest Service has not shown that those areas that are heavily grazed are in worse condition than those that are moderately grazed. In fact, the report shows that almost all of the rangeland within the forest is currently in good condition or trending toward good condition. Please provide such information in the technical reports or remove this conclusory language. Indeed, the Forest Service has failed to analyze the fact that proper grazing has actually increased and produced the current sagebrush communities that thrive throughout the planning area.	The Ashley National Forest uses "best available science" to determine condition and trend when analyzing impacts of domestic and wild ungulate grazing on rangelands. Best available science includes both relevant published literature and quantitative and qualitative information derived from site specific monitoring. Site specific information collected from long-term studies is used to determine whether or not desired conditions are being met and to determine the direction of trend. Over 19,000 long-term studies are currently established on the forest and are the primary basis for the assessment. Monitoring methods used by the Ashley National Forest are selected based on efficiency, economy, and relevant output information that directly addresses desired condition criteria. Several monitoring methods are or have been used to gather data for condition and trend analysis. These include but are not limited to repeat photography, photo plot, line intercept, line point intercept, vegetation ocular macroplot, nested frequency, and greenline. Each of these methods have been peer reviewed, are included in the Forest Service Handbook 2209.14 Chapter 20, and/or are supported in literature. Several key rangeland characteristics are monitored at many of the study sites to determine condition and indicate trend for vegetation. These may include ground cover, species presence and cover and/or frequency, crown cover, density, and vegetation height. The response of herbaceous and woody plant species following disturbance (i.e. grazing) is also assessed at affected sites. These characteristics are applicable to the management and desired condition standards and mitigation measures for vegetation listed below. Total ground cover equal to or greater than 85% of potential for all plant communities grazed by livestock. Plant communities dominated by native and selected non-native plant species of moderate to high value for watershed protection (or erosion control) are equal to or greater than 60% of relative cover in plant communities. Selected non-native species are those included in seedings of roadsides, burned areas, and rangelands that have high value for soil protection. These species have generally demonstrated capacity to suppress cheatgrass and other invasive annuals. Dominance includes greater cover, greater frequency, or greater abundance of moderate and high value plants than low value plants. This includes woody species as well as herbaceous species. Manage grazing in aspen stands to ensure sprouting and sprout survival sufficient to perpetuate the long-term viability of aspen clones. Crown cover of aspen sprouts 40% or greater at five years post-disturbance. Stream bank stability is equal to or greater than 80% of potential. Utilization of key forage species no greater than 50% of current year's growth except where long-term monitoring demonstrates a different allowable use level is appropriate. In goshawk habitat (forested lands, including transitory openings created by fire), limit understory grazing utilization to an average of 20% by weight, not to exceed 40% on any specific site. Average browse utilization would be limited to 40% by weight, and would not exceed 60%. This standard does not apply to non-forested habitat types (Goshawk Strategy). Leave a 4" or greater stubble height of herbaceous species at the end of the grazing season between greenline and bank full of stream systems. The assessment for vegetation resources addressed natural range of variation, current status and trend, management activities and uses, influence of drivers and stressors, and climate related risks and trends. Site specific information from thousands of long-term studies was used to address these key characteristics based on the methodology described above, which indicates that best available science was used to make determinations in the assessment including those regarding livestock grazing and wild ungulate use. In conclusion, we believe that adequate scientific evidence was used to make these determinations.
Public Lands Policy Coordinating Office, Sindy Smith	Comparison of the Natural Range of Variation and Current ConditionsPages 64-68 The section on pinyon-juniper (PJ) woodlands does not mention any type of expansion or encroachment of pinyon-juniper on other ecosystems within the forest. The Forest Service needs to include in this section any information concerning encroaching pinyon-juniper that is spreading into other ecosystems. A few paragraphs mention its ability to spread, however it needs to be abundantly clear what areas are facing PJ encroachment so that the upcoming forest plan can address the overall issue.	The encroachment of pinyon-juniper into other communities is mentioned many times in the assessment. Please see the following located in the Draft Terrestrial Ecosystems Technical Report: P. 60: "Many communities, especially those within and above the pinyon-juniper belt are susceptible to conifer encroachment and displacement." "Notable trends include most mountain big sagebrush communities in late seral stages with canopy cover exceeding 20 percent and widespread encroachment and displacement of conifers in many of these communities. Some sagebrush communities have transitioned into conifer forest or woodland types with prolonged absence of fire." P. 63: "For decades, conifer encroachment in, and displacement of sagebrush communities has progressively increased with decreased fire frequency, which indicates moderate departure from the natural range of variation. This trend is most common in mountain big, Wyoming big, and black sagebrush communities in and above the pinyon-juniper belt and in upper elevations of mountain big and black sagebrush near Douglas-fir and ponderosa pine forests." P. 64: "Conifer encroachment and displacement occurs within some sagebrush communities, but not of the magnitude within and directly above the pinyon-juniper belt." P. 109: "For decades, conifer encroachment in and displacement of sagebrush communities has progressively increased with decreased fire frequency. This increase in conifer encroachment suggests a low to moderate departure from the natural range of variation. This trend is most common in mountain big, Wyoming big, and black sagebrush communities within and above the pinyon-juniper belt." P. 110: "Conifer encroachment and displacement occurs within some communities, but not of the magnitude within and directly above the pinyon-juniper belt."

Public Lands Policy Coordinating Office, Sindy Smith	Management Activities and UsesPage 73, paragraph 1. Increases in invasive annuals are leading to reduced forage and grazing. However, the Forest Service stated that no known projects were performed to increase forage production. Active management of invasive plants by the Forest Service is vital to ensure that forest health trends in a positive direction.	The assessment identifies and discusses stressors and drivers of vegetation communities. An important stressor of sagebrush, pinyon-juniper, and desert shrub communities are invasive plant species. Invasive plants are typically non-native with high capacity to establish, spread, and dominate native plant communities. They have and are altering native plant species composition indefinitely by competitively displacing native plants, especially following a disturbance event such as fire or drought. Invasive annual plants such as cheatgrass and halogeton have low resource value and degrade forest rangelands. Invasive plants have been adequately discussed within the assessment.
Public Lands Policy Coordinating Office, Sindy Smith	Livestock Numbers Page 88, paragraph 1. The State is concerned with the following language: "Permitted livestock use is expected to remain relatively unchanged, but elk numbers are expected to increase during the next plan period." Essentially the same statement is found in the analysis of Aspen conditions, and this sentence should be removed for the same reasons stated above.	The following sentence was on page 23 was removed from the draft Terrestrial Ecosystems Technical Report, "Livestock grazing is not expected to increase in alpine areas during the next plan period and current grazing management is not expected to move plant communities outside the natural range of variation." The following sentence was on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, minimal changes in fire suppression policies are expected and timber harvest production most likely will remain stable or decrease." The following sentence on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged." The sentence was changed to, "Elk numbers within in the State of Utah are expected to increase over the next decade based on the current trend to manage for increased state population objectives." The following sentence on page 61 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush communities." The following sentence on page 88 was changed in the draft Terrestrial Ecosystems Technical Report to, "However, long-term monitoring demonstrates aspen sustainability in the plan area concurrent with existing levels of permitted livestock grazing and wild ungulate use." The following sentence was removed in the Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged, but elk numbers are expected to increase during the next plan period." The following sentence on page 88 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, minimal changes in fire suppression policies are expected and timber harvest production most likely will remain stable or decrease." The following sentence on page 109 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush."
Public Lands Policy Coordinating Office, Sindy Smith	Influences Drivers and StressorsPage 108, paragraph 2. The statement that grazing is not expected to increase in sagebrush communities needs to be more flexible. Include language that indicates that grazing is not expected to increase "unless conditions allow". This gives more flexibility to the forest planning team as they devise any need for change from this report.	The following sentence was on page 23 was removed from the draft Terrestrial Ecosystems Technical Report, "Livestock grazing is not expected to increase in alpine areas during the next plan period and current grazing management is not expected to move plant communities outside the natural range of variation." The following sentence was on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, minimal changes in fire suppression policies are expected and timber harvest production most likely will remain stable or decrease." The following sentence on page 43 was removed from the draft Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged." The sentence was changed to, "Elk numbers within in the State of Utah are expected to increase over the next decade based on the current trend to manage for increased state population objectives." The following sentence on page 61 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush communities." The following sentence on page 88 was changed in the draft Terrestrial Ecosystems Technical Report to, "However, long-term monitoring demonstrates aspen sustainability in the plan area concurrent with existing levels of permitted livestock grazing and wild ungulate use." The following sentence was removed in the Terrestrial Ecosystems Technical Report, "Permitted livestock use is expected to remain relatively unchanged, but elk numbers are expected to increase during the next plan period." The following sentence on page 88 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, minimal changes in fire suppression policies are expected and timber harvest production most likely will remain stable or decrease." The following sentence on page 109 was removed from the draft Terrestrial Ecosystems Technical Report, "During the next plan period, grazing numbers, time of use, or grazing intensities are not expected to increase in sagebrush."
Public Lands Policy Coordinating Office, Sindy Smith	Influences of Drivers and StressorsPage 116, paragraph 2. If both livestock and wildlife grazing has not been great enough to cause a departure from the NRV, why is livestock grazing referred to as a stressor while wildlife is not? Both need to be described as stressors (Weisberg et al. 2002) or the reason behind one being a stressor and the other not being a stressor needs to be explained.	In the assessment, livestock and wildlife impacts are recognized as stressors to terrestrial vegetation communities where those impacts occur. These have been evaluated for past, current, and foreseeable impacts to vegetation communities, including rare and unique habitats. Refer to pages 17, 19, and 23 of the draft assessment and pages 9, 11-12, 19, 41, 61, and 75 in the Terrestrial Ecosystems Report that discuss domestic and wild ungulate impacts on terrestrial vegetation communities.
Public Lands Policy Coordinating Office, Sindy Smith	According to the National Forest Management Act (NFMA), the Forest Service is tasked with the responsibility that all management decisions within National Forests, including the forest plan revision, meet criteria "designed to secure the maximum benefits of multiple use sustained yield management". In accordance with this mandate, the State encourages the Forest Service to maximize AUMs, logging and other uses] carried out on Ashley National Forest. The State also encourages the Forest Service to efficiently manage range and forests to maximize forage and timber production and other recreational uses. Agriculture and other extractive industries provide steady industry in employment and economic contributions in rural areas with significant amounts of public lands.	We are definitely striving to meet the intent of the 2012 Planning Rule and look for opportunities to encourage multiple use.
Public Lands Policy Coordinating Office, Sindy Smith	Economic Specialization and EmploymentPage 11. It may be beneficial for the Forest Service to outline any potential fluctuations in agriculturally based employment due to heavy reliance on access to the Ashley National Forest for grazing. Although agriculture is not the largest economic contributor, this page seems to highlight the importance of a stable agricultural industry when it comes to jobs in each county.	The Ashley National Forest recognizes the economic, social, and cultural importance of livestock grazing to local communities. Additional language has been added to the cultural services discussion presented in the Draft Assessment, page 71, to note social and cultural contributions. 2014 total employment in the analysis area was about 65,000 jobs and \$4 billion in labor income. The economic contributions from FS activities on the Ashley NF, including from grazing, is less than 1% of the total employment in the economic analysis area. Therefore, the grazing contributions are not considered major economic contributions when compared to the economic conditions in the analysis area. The economic contributions estimated in the assessment report include direct, indirect, and induced impacts. The assessment is based on readily available information for rapid analysis. Additional baseline data and impacts analysis related to livestock grazing from proposed management will be considered and analyzed as appropriate for the EIS.
Public Lands Policy Coordinating Office, Sindy Smith	Economic Specialization and Employment Page 11-12. Summit, Utah, Wasatch, and Uinta Counties are not part of the four-county planning area. The fact that these counties are on the margins of the planning area needs to be highlighted on these pages.	Additional clarifying text has been added to the Assessment under the Economic Contributions of the Ashley National Forest section and to the section noted in the Economic Environmental Report (p 11-12) to clarify that this data represents the contributions from the economic analysis area, which includes Daggett, Duchesne, Uintah, and Sweetwater counties.
Public Lands Policy Coordinating Office, Sindy Smith	The State has some concerns regarding how scenic character interacts with the Forest Service's multiple use mandate. A variety of uses are currently being employed on the forest and the planning rules do not explain how scenery fits in with these uses. According to Section 6 of the National Forest Management Act (NFMA), any forest plan revision is required to "provide for multiple use and sustained yield of the products and services obtained there from and in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness." The scenery process needs to reflect the fact that the Ashley National Forest is to be managed under a multiple use mandate.	The scenery technical report discusses the scenic concern levels and the sites, routes, and areas identified at which concern level in the Landscape Visibility section. Concern levels reflect the relative degree of concern people have for the scenery from sites, routes and areas. Higher use campgrounds, day use sites, travel routes and the Flaming Gorge Reservoir were given the highest concern level, while moderate use campgrounds, day use sites, and travel routes were given a moderate concern level. The lowest concern levels were not identified on the Ashley National Forest.
Public Lands Policy Coordinating Office, Sindy Smith	The 2012 Planning Rule requires scenic character to always be referenced in conjunction with recreation but never with other forest uses. Consequently, only areas with substantial levels of tourism should receive higher concern levels and higher levels of scenic character. Those areas that are not under the heaviest recreational use should receive a lower concern level and a less strict designation of scenic character.	The scenery technical report discusses the scenic concern levels and the sites, routes, and areas identified at which concern level in the Landscape Visibility section. Concern levels reflect the relative degree of concern people have for the scenery from sites, routes and areas. Higher use campgrounds, day use sites, travel routes and the Flaming Gorge Reservoir were given the highest concern level, while moderate use campgrounds, day use sites, and travel routes were given a moderate concern level. The lowest concern levels were not identified on the Ashley National Forest.
Public Lands Policy Coordinating Office, Sindy Smith	Under the 2012 Planning Rule, scenic character is defined as a "combination of the physical, biological, and cultural images that give an area its scenic identity and contributes to its sense of place." There are currently 65 grazing allotments that cover the majority of the forest, which contribute to the scenic character in all three of the above-mentioned criteria. Livestock grazing has been a principal use on the forest for over 180 years, driving much of the economic growth and settlement in local communities. Cities such as Manila, Dutch John, Duchesne, Vernal, Roosevelt, and Price were originally settled by miners and ranchers who were dependent on the forest for their livelihoods. Ranching remains a vital part of the culture in local communities and the forest itself. Current grazing levels are sustainable and the presence of domestic livestock on the forest is a vital part of the forest's cultural image and scenic character. Without the 180 years of domestic livestock grazing that has occurred, the Ashley National Forest and surrounding communities would be a different place culturally. Due to the cultural and historical importance of livestock grazing, domestic livestock grazing should be recognized as contributing to the cultural aspect of scenic character within the forest. In other words, livestock operations do not hurt scenic character but enhance that character. [...] A second part of scenic character is the biological health of ecosystems within the forest. Multiple studies show how sustainable livestock grazing contributes to healthy forest ecosystems. Proper grazing management benefits riparian areas within the forest by improving species richness (Clary 1999), increasing levels of biomass (Martin and Chambers 2001), preserving and improving grassy riparian buffers (Lyons et al. 2000), and serving as a disturbance tool for riparian restoration (Sovell et al. 2000). Proper livestock grazing also benefits sage-steppe ecosystems through increased early succession species, increased annual species richness, improved plant species diversity and, increased heterogeneity (Pekin et al. 2014). Also, proper livestock grazing is beneficial in managing and controlling invasive species and noxious weeds (Culliney 2005; Davison et al. n.d.; Frost and Launchbaugh 2003; Popay and Field 1996). The presence of livestock helps preserve vital ecosystems that in turn support wildlife. The third aspect of scenic character is the physical images that contribute to the forest's scenic identity and sense of place. Domestic livestock grazing creates physical images that are beneficial to the forest. Livestock grazing reduces fuel loads (Strand et al. 2014) and reduces the risk of catastrophic wildfires (Davies et al. 2015; Diamond et al. 2009), which helps preserve the physical images and attributes of the forest that make up a part of its scenic character. By reducing fuel loads and the risk of catastrophic wildfires, domestic grazing preserves the physical scenic integrity of the forest and the ability of all users to enjoy the land. Overall, sustainable domestic livestock grazing is an integral part of the scenic characteristics of the forest and must be seriously considered. The forest's scenic character is largely dependent on the continued presence of domestic livestock to preserve the cultural, biological, and physical images of the Ashley National Forest.	The Scenery Technical Report mentions grazing as part of the scenic character and scenic integrity on the Ashley National Forest. The visual management system and scenery management systems recognize that livestock grazing structures such as log rail fences and historic barns contribute to scenic character in rural/agricultural settings. There are opposing views on if livestock grazing improves or detracts from the biological attributes of scenery character.