

Executive Summary

Introduction

The following is a summary of public comments received by the U.S. Forest Service (Forest Service or USFS) regarding the *Draft Assessment Report of Ecological, Social, and Economic Conditions on the Ashley National Forest* (hereafter referred to as the assessment). The public comment period for the assessment occurred from June 30 to August 19, 2017. During this timeframe, the Forest Service received 24 unique responses (excluding test or duplicate submittals). These responses are analyzed using the content analysis process described in the next section.

Although this summary attempts to capture the full range of public issues and concerns, they should be considered with caution. Because respondents are self-selected, their comments may not necessarily represent the sentiments of the public as a whole. This analysis attempts to provide a fair representation of the wide range of views submitted, but it does not attempt to treat input as if it was a vote or a statistical sample. In addition, many of the respondents' reasons for voicing these viewpoints are varied, subtle, or detailed. In an effort to provide a succinct summary of all of the concerns raised, many subtleties are not conveyed in this summary.

This summary is divided into the following sections:

- Introduction
- Content Analysis Process
- Summary of Public Comment

Content Analysis Process

Content analysis is a method of eliciting meanings, ideas, and other information from written text, pictures, or audio or video messages. The goals of the content analysis process are to

- ensure that every comment is considered,
- identify the concerns raised by all respondents,
- represent the breadth and depth of the public's viewpoints and concerns as fairly as possible, and
- present public concerns in such a way as to facilitate the Forest Service's consideration of comments.

A specific method of content analysis has been developed and refined by the National Environmental Policy Act (NEPA) Services Group, a specialized Forest Service unit that analyzes public comment on federal land and resource management agency assessments and proposals. This systematic process is designed to provide specific demographic information, establish a mailing list of respondents, identify individual comments by topic in each response, evaluate similar comments from different responses, and summarize like comments as specific concern statements. The process also provides a relational database capable of reporting various types of information while linking comments to original letters.

Through the content analysis process, the content analysis team strives to identify all relevant issues—not just those represented by the most respondents. The breadth, depth, and rationale of each

comment are especially important. In addition to capturing relevant factual input, analysts try to capture the relative emotion and strength of public sentiment behind particular viewpoints.

Summary of Public Comment

The following section is a summary of public sentiment on a variety of issues regarding the assessment and/or Ashley National Forest Plan Revision (Forest Plan). This section begins with a general analysis and proceeds with identification and discussion of the respondents' main areas of concern. Responses in italics are direct quotations from respondents.

Public Involvement and Tribal Consultation

With regards to public involvement, respondents ask the Forest Service to continue to engage and solicit input from affected stakeholders and local forest users. It is requested that the Forest Service improve planning document accessibility through earlier outreach/document distribution and more diverse notification strategies, such as articles to local newspapers and radio ads, since *“email notifications are useful but not all the general public is included on the list.”*

One respondent also states that the Forest Service should involve the Ute Tribe in land planning decisions. The Forest Service notes that Ute Tribe involvement has been ongoing since the inception of the Forest Plan Revision and will continue, as desired by the Tribe, until the Forest Plan Revision is complete.

Forest Plan and Regulatory Compliance

Numerous commenters express support for a management policy that encourages multiple use, as directed by the National Forest Management Act. It is also requested that the Forest Service seek to achieve the goals established in the 2012 Planning Rule.

Effects Analysis

Several comments praise the assessment for its accurate, well-written information. In contrast, other respondents criticize the assessment for failing to respond to previously submitted comments, inconsistently capturing information and conclusions from associated technical reports, or organizing content under differing headers, which makes cross-reference between the assessment and technical reports more difficult. *“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.”*

In particular, one commenter states that the assessment should avoid making pre-decisional statements regarding management decisions – such as fire suppression, livestock stocking levels, and timber harvesting – that may be implemented as part of the Forest Plan. *“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.”

As part of their general document review, other respondents identify a need for cumulative effects analysis to help guide forest management decisions. A variety of document editorial and figure edits are also requested by respondents.

Air and Climate

To improve the air quality analysis in the assessment it is requested that the Forest Service provide 1) a quantitative emissions inventory for air pollution sources, 2) estimates of reasonably foreseeable development, 3) air quality monitoring data for National Ambient Air Quality Standards, 4) information on fine particulate matter and dust impacts, and 5) management stipulations to minimize air emissions.

Concern is also expressed that the assessment conduct a robust analysis of climate change impacts to all forest resources and acknowledge the Memorandum of Understanding among the U.S. Department of Agriculture, Department of Interior, and Environmental Protection Agency (EPA) *Regarding Air Quality Analyses and Mitigation for Federal Oil and Gas Decisions through the NEPA Process.*

Biological Impacts

Concern is expressed that the assessment does not provide sufficient information and analysis of wildlife and plant species that occur in the Ashley National Forest. Other comments also highlight potential Forest Plan challenges. As one respondent states, *“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.”*

Fire Risk

Support is expressed for the continued use of prescribed fire as a tool for ecosystem management in the Forest Plan. However, comments also request 1) consideration of other factors that can lead to frequent, large and severe wildfires, such as lack of funding for active forest management, closed roads/trails, and lawsuits by non-governmental organizations (NGOs); and 2) evaluation of the use of livestock grazing as a fuels reduction tool.

Lands and Designation

Several commenters state that the Forest Service should prohibits pipeline corridors or rights-of-way within the Flaming Gorge National Recreation Area (NRA). It is also requested that the Forest Plan ensure that all groups continue to have access to the forest for varied activities.

With regard to existing and future land designations, respondents request that the Forest Service accurately capture all existing designated areas by 1) providing additional information and analysis about existing Research Natural Areas; 2) identifying and assessing all Inventoried Roadless Areas (IRAs) protected under the Roadless Area Conservation Rule, as well as newly inventoried areas identified through the Chapter 70 wilderness inventory; 3) including the ecological and socioeconomic benefits of designated lands; and 4) identifying any designated critical habitat, National Historic Landmarks, or adjacent designated areas. It is also requested that the Forest Service identify additional areas for designation, such as important watersheds and water resources,

rare (e.g. fens) or dominant habitat types, coniferous forests, and Geological Event Special Management Areas. Per one commenter, this latter analysis will “*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.*”

Concern is expressed that the Forest Service must address how wilderness and wild and scenic river designations will be integrated into forest planning and continue to involve cooperating agencies.

Livestock Grazing

Livestock grazing comments cover a variety of topics, as summarized below.

- It is requested that the Forest Service acknowledge the cultural importance of agriculture in the assessment. “*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.*” Other comments also provide support for livestock grazing, noting the socioeconomic benefits to local communities.
- Several respondents state that the assessment should provide additional justification for reported labor income and employment associated with livestock grazing.
- It is suggested that the assessment should also consider factors towards, and mechanisms to resolve, declines in animal unit months (AUMs) over time, and provide updated total AUM numbers and the percentage of decline.
- Conversely, one respondent indicates that the assessment should discuss mechanisms for reducing or removing AUMs in degraded areas.
- With regards to rangeland condition, one entity expresses concern that the Forest Service conduct rangeland monitoring developed in coordination with permittees.
- Another comment requests “*information regarding changes in forage (potential short-term decrease, long-term increase) following fire.*”
- It is also requested that the draft assessment identify ecosystem benefits from grazing, such as increased species productivity, management of invasive species, and improved soils, and manage habitat to support both livestock and wildlife. As one respondent states, “*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.*”

Minerals and Geologic Resources

It is requested that the Forest Service clarify and/or prohibit oil and gas development within the Flaming Gorge NRA to protect terrestrial species and habitat. Respondents further request that the Forest Service conduct an oil and gas suitability and leasing analysis as part of the Forest Plan to clarify how oil and gas development will be accessed and managed.

Support is expressed for the draft assessment's recognition of sodium development within the Flaming Gorge NRA. However, one commenter recommends that “*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.*”

Several commenters state that the assessment should include a list of caves protected under the Federal Cave Resources Protection Act, and that each significant cave should have an individual management plan. It is also recommended that the assessment consider the cumulative impacts of energy development on biological resources and consider design criteria, mitigation measures, and best management practices to mitigate potential negative environmental impacts.

Recreation

Comments related to recreation in the Ashley National Forest fall into the following topics.

- Recreation infrastructure. It is requested that the assessment provide additional discussion of the need for developed campgrounds and associated facilities to provide recreation opportunities, particularly as the population ages. As one respondent states, *“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.”*
- Roadway maintenance and access: It is requested that the assessment recognize *“the necessity of coordinating roadway maintenance and access with both private and public land owners”* to manage motorized and non-motorized dispersed recreation.
- Recreation trends and conflict: Several comments note a need to address changing recreational trends and increasing competition in the assessment.
- Backcountry trails: One respondent states that the Forest Service should establish an outreach program to recruit local youth and community groups to assist Forest Service personnel in the work of clearing backcountry trails for horse usage.
- Outfitters: It is recommended that the Forest Service encourage the use of outfitter and guide activities as part of the Forest Plan.
- Educational outreach: It is also recommended that the Forest Service look for opportunities to provide educational and other opportunities to connect youth and underserved populations with nature.
- Scenic byways: One comment states that the assessment should clarify what scenic byways are present within the Ashley National Forest.
- Mountain biking: One respondent requests that the assessment acknowledge public use and awareness of mountain bike trails in the Flaming Gorge NRA.
- Flaming Gorge NRA: Per one comment, the assessment should also *“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.”*

Socioeconomics

As briefly mentioned above, one socioeconomic comment asks the Forest Service to consider the economic importance of the Flaming Gorge NRA to the Ashley National Forest. Additional comments request that the Forest Service 1) address any disproportionately high and adverse human health and environmental impacts on environmental justice populations and any plans to incorporate environmental justice concerns into the Forest Plan revision process, 2) update socioeconomic data using available state resources and clarify which counties are within the planning area, 3) compare the economic and resource costs created by motorized, non-motorized, and bicycle recreational

users; 4) provide more economic information on various National Forest users; and 5) acknowledge agriculture and timber harvesting as economic contributors.

Soils

Although few comments were provided on this topic, two respondents ask the Forest Service to provide a map of fragile soils, conduct a quantitative estimate of erosion rates, and “*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.*”

Timber

Comments on timber resources are limited, but respondents identify two concerns with regards to the assessment: 1) the need to address additional factors that can lead to reduced timber sales, including lawsuits by NGOs; and 2) clarification on timber sales figures and estimated production.

Transportation

It is requested that the Forest Service clarify wording related to road maintenance funding and work with local counties when considering road closures or maintaining forest roads, as well as consider opportunities to re-open roads to facilitate forest management.

Vegetation

Concern is expressed that the assessment address 1) livestock and wildlife grazing as potential stressors on terrestrial vegetation communities, 2) impacts on forest multiple uses from loss of vegetation diversity, and 3) compliance with the Healthy Forest Restoration Act. It is also recommended that the Forest Service ensure active management of invasive plants and clarify which plants are considered to be nonnative/invasive in the assessment.

Additional vegetation-related comments are summarized below.

- Pinyon-Juniper and fire. It is recommended that the Forest Service modify the assessment's discussion of pinyon-juniper to clarify the role of cheatgrass in fire risk, the relative risk of fire with increasing crown cover, the relative risk of fire for pinyon-juniper versus other vegetation communities, and the history of fires in pinyon-juniper landscapes.
- Pinyon-juniper historical extent and chronology. It is requested that the Forest Service revise the assessment's description of pinyon-juniper's historical extent and chronology using best available science.
- Pinyon-juniper and invasives. One respondent asks the Forest Service to revise the discussion of pinyon-juniper and invasive colonization because “*In reality, as shown by Tausch (1999) and Nowak and others (1999), the colonization of invasive annuals is a result of the absence of pinyon juniper woodlands. When pinyon 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 pinyon-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).*”

- Pinyon-juniper expansion. One respondent states that the assessment should identify and address pinyon-juniper encroachment into other ecosystems.
- Endemic plants. Per one respondent, *“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 recreational/oil-gas development pressures and fragmentation both within the Forest and adjacent lands.”* When identifying species at risk, it is recommended that the Forest Service use updated rare plant lists and not rely solely on NatureServe rankings. Other comments also identify a need to manage cushion plant communities as areas of special management attention.
- Mountain goat impacts. It is requested that the assessment address mountain goat impacts to plant species and, more specifically, to include species with a high priority for rare plant monitoring as a result of the range-wide goat introduction. As stated, *“In reviewing your species at risk assessment, we see no reference to species we have ranked as ‘high priority’ including Erigeron goodrichii, Townsendia goodrichii and Draba inexpectata.”*

Visual Resources

Respondents state that the assessment should consider the multiple use mandate when assessing scenic character and assign lower concern levels to areas that do not receive heavy recreational use. In particular, one commenter states that livestock grazing should be recognized as part of the Ashley Forest’s scenic characteristics.

Water Resources

Concern is expressed that the Forest Plan protect aquatic resources and resident fish populations, as well as maintain water quality. Concern is also expressed that the assessment recognize the importance of Forest Service water supplies on water users in Duchesne County.

Comments on water resources also request the following additional analysis.

- Source water. As requested by one entity, *“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 USPS-authorized activities in the planning area, it is important to identify where these sources are located. Therefore, [we] recommend 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.”*
- Groundwater. Identification of major and shallow aquifers, location and extent of groundwater recharge areas, available groundwater quality information, and assessment of its *“role on the forest for stream connectivity.”*

- Existing conditions. Map and summary of the assessment area watersheds and waters, including streams, lakes, springs and wetlands, as well as designated beneficial uses, 303(d) listed waterbodies, and available surface water quality data (see more below).
- Water quality analysis. Incorporation of available information and monitoring data on water quality for the assessment area, including parameters such as total phosphorus, total nitrogen, total suspended solids, turbidity, temperature, and salinity.
- Energy development impacts. Discussion of water contamination from oil and gas development.
- Wildfire impacts. Consideration of the risk of wildfires to loss of watershed condition and water quality.
- Wildlife impacts. Per one respondent, *“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.”*
- Road impacts. Identification of existing forest roads and trails network, as well as reasonably foreseeable actions, adjacent to planning area waters, and discussion of contributing causes for impaired waters.
- Water yield. Evaluation of the role of vegetation management in water yield. Per this commenter, *“Science mentioned in the Duchesne County Resource Management Plan indicates that water yields may indeed be increased through effective vegetation management.”*
- Other water impacts. It is requested that the assessment consider 1) tributary salinity contributions to the Flaming Gorge and the Green River System and the need for salinity control projects; 2) maintaining sufficient water supplies in Flaming Gorge Reservoir to meet downstream uses; and 3) potential trans-basin diversions from the Flaming Gorge Reservoir to the front range of Colorado.

One respondent states that the Forest Service should engage volunteers, nonprofit organizations, citizen science use, and land users to support water management efforts. It is also requested that the assessment provide monitoring, implement management stipulations, and use tools such as the Watershed Condition Framework to protect planning area watersheds and aquatic resources.

Wetlands and Riparian Areas

It is requested that the assessment include a discussion of the types, functions, and acreage of wetlands, riparian areas, and springs present in the Ashley National Forest. In particular, one commenter states that fens should be identified, as *“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.”* In contrast, one respondent asks that the Forest Service remove language regarding impacts to the Whiterocks Canyon fen.

Other comments suggest that the assessment should consider both the benefits of livestock grazing and adverse impacts of wildlife activity to provide a more comprehensive riparian analysis.

Wildlife and Fish

Concern is expressed that the assessment provide management direction to ensure habitat protection or improvement for forest plan species within a multi-use framework. More specifically, some comments request that the assessment should

- address wildlife concerns related to human activity/visitation or development in the Forest,
- include discussion regarding riparian vegetation communities and habitat structure for native bird species,
- address wildlife impacts from state issued hunting, trapping, or fishing permits,
- discuss efforts to remove pinyon-juniper to benefit sage grouse habitat,
- maintain areas currently supporting Colorado River Cutthroat Trout populations and identify opportunities to increase distribution, and
- add additional information regarding populations and management of mule deer, Rocky Mountain elk, bighorn sheep, and sage-grouse. For example, per one commenter, *“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.”*

One respondent expresses appreciation for assessment findings 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.’*” It is also expressed that the Forest Service coordinate with the State of Wyoming and the Wyoming Game and Fish Department regarding wildlife and its habitat.

Species of Conservation Concern

Comments regarding wildlife species of conservation concern (SCC) are mixed. One commenter states that the assessment should remove “species of public interest, potential species of concern, and species of interest,” as they are not covered under the 2012 Planning Rule. In contrast, other respondents argue that the assessment should 1) include species included on the Regional Forester Sensitive Species and Wyoming Species of Greatest Conservation Need as part of the SCC list, and 2) provide additional rationale for inclusion or exclusion of species to the list of SCC based on best available science. As stated by one entity, *“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.”* More specifically, one comment states that the midget faded rattlesnake should be included in the SCC list.

Corridors

Respondents state that the Forest Service should acknowledge the importance of wildlife corridors/linkages in the assessment. *“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.”*